

Statement on principal adverse impacts of investment decisions on sustainability factors

Financial market participant

Name CapMan AIFM Oy

LEI 743700AYPRIEVU7YGF76

Summary

CapMan AIFM Oy (743700AYPRIEVU7YGF76, "CapMan") considers principal adverse impacts of its investment decisions on sustainability factors. The present statement is the consolidated principal adverse sustainability impacts statement of CapMan. This principal adverse impacts statement covers the reference period from 1 January to 31 December 2023 on the indicators for adverse impacts of Table 1, and any relevant indicators of Table 2 and 3 of Annex I of the SFDR Delegated Act.

A summary of principal adverse impacts and the indicators used to measure them that CapMan considers is presented as follows:

Impacts and indicators applicable to investments in investee companies

Climate and other environment-related indicators

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| <ol style="list-style-type: none">1. GHG emissions2. Carbon footprint3. GHG intensity of investee companies4. Exposure to companies active in the fossil fuel sector5. Share of non-renewable energy consumption and production6. Energy consumption intensity per high impact climate sector | <ol style="list-style-type: none">7. Activities negatively affecting biodiversity-sensitive areas8. Emissions to water9. Hazardous waste and radioactive waste ratio |
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Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)

Impacts and indicators applicable to real estate

17. Exposure to fossil fuels through real estate assets
18. Exposure to energy-inefficient real estate assets

Additional impacts and indicators

Additional climate and other environment-related indicators

18. GHG emissions (real estate)
19. Energy consumption intensity (real estate)

Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

4. Lack of a supplier code of conduct
9. Lack of a human rights policy

Description of principal adverse sustainability impacts

The following table includes a description of principal adverse sustainability impacts and metrics and manners of disclosure. Numeric indicators measuring impact are provided starting from the reference period 1 January to 31 December 2022.

Indicators applicable to investments in investee companies

General explanation for the data differences: The reported number of investee companies has increased compared to last year. Additionally, the results for 2022 have been recalculated to align with the calculation methods used in 2023.

Climate and other environment-related indicators

	Adverse sustainability indicator	Metric	Impact year 2023	Impact year 2022	Explanation	Actions taken, actions planned and targets set for the next reference period
GHG emissions	1. GHG emissions	Scope 1 GHG emissions	41.1 tCO2e	44.7 tCO2e	In 2023, enhancements to the data collection process improved data quality, leading to a notable increase in greenhouse gas emissions due to more precise calculations and expanded coverage.	<p>General approach: CapMan has committed to the Science Based Targets initiative, using the Private Equity Sector Science-Based Targets Guidance, which includes investments in private equity, infrastructure and real estate. To this end, CapMan's short-term emission reduction targets for 2027 and 2032 have been validated (on a 2021 baseline). In addition, CapMan has committed to manage its investments in line with net zero by 2040. CapMan collects and discloses data from its investments on Scope 1, 2, and 3 emissions. CapMan is an active owner and drives the green transition of its portfolio companies.</p> <p>Processes and actions: CapMan works with portfolio companies to establish plans to reduce emissions and set them on a decarbonization pathway for both majority and minority held stakes. For fund of funds and credit funds, CapMan seeks to engage with other stakeholders on greenhouse gas emissions topics if material.</p> <p>Restrictions: CapMan's restriction list for private equity and infrastructure investments covers activities with highly negative climate impacts (e.g. thermal coal, unconventional fossil energy).</p>
		Scope 2 GHG emissions	62.1 tCO2e	351.4 tCO2e		
		Scope 3 GHG emissions	4,448.3 tCO2e	1,417.2 tCO2e		
		Total GHG emissions	4,551.5 tCO2e	1,813.3 tCO2e		
	2. Carbon footprint	Carbon footprint	30.6 tCO2e/MEUR	35.5 tCO2e/MEUR		
	3. GHG intensity of investee companies	GHG intensity of investee companies	20,166.0 tCO2e/MEUR	120.2 tCO2e/MEUR		

4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	0	0	No exposure to fossil fuels through CapMan's investee companies.	<p>General approach: CapMan has limited exposure to the fossil fuel sector. CapMan is an active owner and drives the green transition of its portfolio companies, especially when exposed to fossil fuels. CapMan collects and will disclose data from its investments on whether they are active in the fossil fuel sector, their energy mix and exposure to high impact climate sector (such as transport). Investments in energy production are mainly renewables or with plans to transition the production to renewable sources.</p> <p>Processes and actions: CapMan identifies companies with potentially high energy consumption and intensity per high impact climate sector and works together with them to transition to renewable energy sources and improvements in efficiency. Companies that are active in the fossil fuel sector will be subject to implementing a fossil fuel transition plan. For fund of funds and credit funds, CapMan seeks to engage with other stakeholders on energy topics if material.</p> <p>Restrictions: CapMan's private equity and infrastructure investment restriction list covers activities with highly negative climate impacts (e.g. thermal coal, unconventional fossil energy and peat). CapMan is allowed to invest in those activities only if the companies transition away from the sector during the holding period.</p>
5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources	73%	75%	In 2023, several investee companies have increased their proportion of renewable energy, leading to a slight reduction in their consumption and production on non-renewable energy sources.	
6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	1.28 GWh/MEUR	0.05 GWh/MEUR	The increase is attributed to one investee company being in the portfolio for the entire year this year, compared to only one quarter last year.	

Bio-diversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	0	0	No operations close to biodiversity-sensitive areas.	<p>General approach: CapMan considers the biodiversity impact of its investments by collecting data from its portfolio companies on whether their operations are located in or near to biodiversity sensitive areas, and whether company operations negatively affect these areas. This data will be disclosed. If biodiversity aspects are deemed material to the portfolio company, mitigation measures will be implemented.</p> <p>Processes and actions: Based on data collected, CapMan identifies portfolio companies with sites or operations in or near biodiversity-sensitive areas and works with the portfolio companies on mitigating the negative impacts. For fund of funds and credit funds, CapMan seeks to engage with other stakeholders on biodiversity topics if material.</p> <p>Restrictions: CapMan's private equity and infrastructure investment restriction list covers activities that have a severe impact on biodiversity (e.g. peat and palm oil production) and companies that are involved in the development of pesticides or plant protection products unauthorized by the European Food Safety Agency.</p>
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0.00 tonnes/MEUR	0.00 tonnes/MEUR		<p>General approach: CapMan considers the water emissions of its investment by collecting data from its portfolio companies on the existence of water management policies, the water consumed and tonnes of effluents discharged within a certain period. This data will be disclosed.</p> <p>Processes and actions: CapMan will work with companies with significant consumption and effluent discharges to create plans and implement efficiency measures and mitigation actions. For fund of funds and credit funds, CapMan seeks to engage with other stakeholders on water related topics if material.</p> <p>Restrictions: CapMan's private equity and infrastructure investment restriction list covers companies involved in the development of pesticides or plant protection products unauthorized by the European Food Safety Agency.</p>

Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	0.11 tonnes/MEUR	0.03 tonnes/MEUR	In 2023, two new investee companies reported hazardous waste and radioactive waste ratios.	<p>General approach: CapMan considers hazardous and radioactive waste generation of its investment by collecting data from its portfolio companies on the amounts of hazardous and radioactive waste generated within a certain period. This data will be disclosed. If deemed material to the portfolio company, mitigation measures will be implemented.</p> <p>Processes and actions: CapMan works with companies with significant hazardous waste generation to create plans and implement efficiency measures, as well as circular approaches as mitigation actions. For fund of funds and credit funds, CapMan seeks to engage with other stakeholders on hazardous and radioactive waste topics if material.</p>
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Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

	Adverse sustainability indicator	Metric	Impact year 2023	Impact year 2022	Explanation	Actions taken, actions planned and targets set for the next reference period
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0	0	Investee companies operating in the Nordic countries exhibit a low risk of such violations.	<p>General approach: CapMan respects, protects and promotes internationally proclaimed human rights. CapMan upholds the Universal Declaration of Human Rights (UDHR), UN Guiding Principles on Business and Human Rights (UNGP), International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at work, as well the Organisation for Economic Co-operation and Development's (OECD) Guidelines for Multinational Enterprises. CapMan is a member of the UN Global Compact (UNGC) and has been a signatory to the Principles of Responsible Investments (PRI) since 2012 and is guided by these international standards to assess the behaviour of portfolio companies. CapMan has provided guidance on what constitutes ESG incidents to its portfolio companies and collects and will disclose this data.</p> <p>Processes and actions: CapMan undertook a human rights value chain salient risk assessment & gap analysis in 2023 and is in the process of implementing the recommendation on strengthening its current human rights due diligence processes. In general, in case of a violation, CapMan will work with portfolio companies to take credible actions to implement adequate measures to remediate the damage, monitor the remediation efforts, and report on whether the results are in line with the outlined remediation plan. For fund of funds and credit funds, CapMan seeks to engage with other stakeholders on social and employee topics if material.</p> <p>Restrictions: CapMan's private equity and infrastructure investment restriction list restricts investments in companies involved in violations of international standards and conventions concerning human rights and labour rights and where the investee company is not able to present clear measures to address the issue and mitigate future breaches.</p>

<p>11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises</p>	<p>Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises</p>	<p>64%</p>	<p>100%</p>	<p>Practical tools like CapMan's policy library support companies lacking processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises.</p>	<p>General approach: CapMan supports the human rights principles described in the UDHR and detailed in the UNGP, and the eight fundamental ILO conventions. CapMan collects data from its portfolio companies on whether they have a policy in place to monitor compliance with the standards for responsible business conduct, or grievance/complaints handling mechanisms to address violations of these standards. CapMan will also be performing a human rights assessment across its value chain..</p> <p>Processes and actions: CapMan's commitment to these principles means that CapMan works together with portfolio companies to develop and implement relevant policies and processes. CapMan undertook a human rights value chain salient risk assessment & gap analysis in 2023.</p> <p>Restrictions: CapMan's private equity and infrastructure investment restriction list restricts investments in companies involved in violations of international standards and conventions concerning human rights and labour rights and where the investee company is not able to present clear measures to address the issue and mitigate future breaches.</p>
<p>12. Unadjusted gender pay gap</p>	<p>Average unadjusted gender pay gap of investee companies</p>	<p>6%</p>	<p>16%</p>	<p>There has been an improvement in investee companies compared to 2022.</p>	<p>General approach: CapMan collects and discloses data on the gender pay gap.</p> <p>Processes and actions: Portfolio companies are encouraged to improve gender pay gap disclosures. For fund of funds and credit funds, CapMan seeks to engage with other stakeholders on social and employee topics if material.</p>

	13. Board gender diversity	Average ratio of male to female board members in investee companies, expressed as a percentage of all board members	88%	82%	The new investee companies have a higher ratio of men to women on their boards, leading to this increase.	<p>General approach: CapMan has set a target to improve gender equality by appointing maximum 70% of one gender to the Board of Directors of its portfolio companies where it has a majority ownership. For minority owned portfolio companies CapMan engages with the other investors to promote this target.</p> <p>Processes and actions: CapMan works together with portfolio companies to identify suitable board members that represent the non-dominant gender of the board. For fund of funds and credit funds, CapMan seeks to engage with other stakeholders on this topic if material.</p>
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0	0	Our restriction list excludes companies involved with controversial weapons.	<p>General approach: CapMan does not invest in Controversial Weapons.</p> <p>Restrictions: Per CapMan's Restriction list there is zero tolerance of involvement in anti-personnel mines, cluster munitions, chemical or biological weapons, nuclear weapons (inside and outside the non-proliferation treaty), blinding laser weapons, non-detectable fragments and incendiary weapons, covering the development, production, use, maintenance, offering for sale, distribution, import or export, storage or transportation of controversial weapons or key components specifically designed for controversial weapons. CapMan also collects data on any involvement from its investments. This data will be disclosed.</p>

Indicators applicable to real estate

	Adverse sustainability indicator	Metric	Impact year 2023	Impact year 2022	Explanation	Actions taken, actions planned and targets set for the next reference period
Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage,	0%	0%	No exposure to fossil fuels through CapMan's real estate assets.	<p>General approach: CapMan seeks to limit its exposure to the fossil fuel sector through its activities as well as tenant relationships.</p>

		transport or manufacture of fossil fuels				
Energy efficiency	18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets	79.79%	89.10%	Several assets have received an improved EU energy performance certificate (EPC) in 2023.	<p>General approach: CapMan seeks to improve energy efficiency of its properties during its ownership. The energy improvements can be a result from energy investments (e.g. on-site renewable energy investments), refurbishment projects (e.g. replacing windows with energy-efficient ones) or for example tenant engagement (e.g. energy savings campaigns).</p> <p>Processes and actions: CapMan has set a mid-term energy intensity target of 26% reduction by 2026 for its properties (excluding mandates). CapMan seeks to engage with property managers, its tenants and other stakeholders to improve the energy efficiency of its properties over their life cycle and to meet its short and long-term targets.</p>

Additional indicators

	Adverse sustainability indicator	Metric	Impact year 2023	Impact year 2022	Explanation	Actions taken, actions planned and targets set for the next reference period
GHG emissions	18. GHG emissions	Scope 1 GHG emissions generated by real estate assets	365 tCO2e	32 tCO2e	Scope 1 has significantly increased in 2023 due to an improved data coverage.	<p>General approach: Real Estate funds account for approx. 2/3 of CapMan's AUM. CapMan has committed to the Science Based Targets initiative, using the Private Equity Sector Science-Based Targets Guidance, which includes investments in private equity, infrastructure, and real estate. In addition, CapMan is targeting in-use operational net-zero emissions by 2035, and upfront and in-use embodied net-zero emissions by</p>

		Scope 2 GHG emissions generated by real estate assets	1,072 tCO2e	1,025 tCO2e	Scope 2 has slightly increased due to an increased heating consumption in 2023.	<p>2040 for its real estate assets. To this end, CapMan's short-term emission reduction targets for 2027 and 2032 have been validated (on a 2021 baseline). CapMan collects and discloses data from its investments on Scope 1, 2, and 3 emissions. CapMan is an active owner and drives the green transition and energy efficiency of its properties.</p> <p>Processes and actions: CapMan identifies sources of high emissions in properties and works together with property managers, tenants and other stakeholders to establish a plan to reduce emissions through energy efficiency improvements, transition to renewable energy and for example by nudging tenant behaviour.</p>
		Scope 3 GHG emissions generated by real estate assets	7,441 tCO2e	8,848 tCO2e	Scope 3 has decreased due to the transition towards renewable energy.	
		Total GHG emissions generated by real estate assets	8,878 tCO2e	9,905 tCO2e	Total GHG emissions have decreased due to the reduction in scope 3 and the transition towards renewable energy.	
Energy consumption	19. Energy consumption intensity	Energy consumption in GWh of owned real estate assets per square meter	0.00022 GWh/sqm/y	0.00021 GWh/sqm/y	Energy consumption intensity has slightly increased due to the increased heating consumption in 2023.	<p>General approach: CapMan seeks to improve energy efficiency of its properties during its ownership. The energy improvements can be a result from energy investments (e.g. on-site renewable energy investments), refurbishment projects (e.g. replacing windows with energy-efficient ones) or for example tenant engagement (e.g. energy savings campaigns).</p> <p>Engagement: CapMan has set a mid-term energy intensity target of 26% reduction by 2026 for its properties (excluding mandates). CapMan seeks to engage with property managers, its tenants and other stakeholders to improve the energy efficiency of its properties over their life cycle and to meet its short and long-term targets.</p>

Social and employee matters	4. Lack of a supplier code of conduct	Share of investments in investee companies without any supplier code of conduct (against unsafe working conditions, precarious work, child labour and forced labour)	15%	38%	Practical tools like CapMan's policy library support companies lacking these policies to facilitate their implementation.	<p>General approach: CapMan has established a Supplier Code of Conduct for its own operations and has provided a template Supplier Code of Conduct for the portfolio companies to be implemented. On an annual basis, CapMan collects data from its portfolio companies on the existence of a Supplier Code of Conduct. This data is disclosed.</p> <p>Processes and actions: CapMan works together with portfolio companies to implement a Supplier Code of Conducts, based on a template, as well as related processes.</p>
Human rights	9. Lack of a human rights policy	Share of investments in entities without a human rights policy	15%	87%		<p>General approach: CapMan collects data from its portfolio companies on an annual basis on the existence of a human rights policy. CapMan has also established a template Social policy that covers human rights considerations for the portfolio companies to implement and adjust based on their materiality aspects. This data is disclosed.</p> <p>Processes and actions: CapMan works together with the portfolio companies to implement the template Social policy.</p>

Description of policies to identify and prioritise principal adverse sustainability impacts

CapMan follows its Sustainable Investment Policy to recognise, monitor and reduce its principal adverse impacts. The Sustainable Investment policy describes CapMan's approach and commitment towards the integration of sustainability within CapMan's investments. CapMan considers a number of environmental, social and governance topics in its portfolio companies and infrastructure investments where the topics are material in relation to the investment. CapMan identifies the respect and protection of human rights as a topic of priority in its code of conduct.

While data is collected on a wide variety of sustainability topics, risk mitigation processes are implemented for material topics. Data for principal adverse impact indicators is collected from the portfolio companies or properties, or is estimated using third-party services or tools, in the instance that direct information is not available.

Engagement policies

The CapMan's Alternative Investment Funds' (AIFs) investments are guided by active ownership and engagement strategies are agreed with potential other shareholders.

References to international standards

CapMan Plc is a signatory to the UN Principles of Responsible Investment and has committed to the Science-Based Targets initiative (SBTi) in order to align with the emission reduction trajectory set by the Paris Agreement.

CapMan respects, protects and promotes internationally proclaimed human rights. CapMan upholds the Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights, International Labour Organisation's Declaration on Fundamental Principles and Rights at work, as well the Organisation for Economic Co-operation and Development's Guidelines for multinational enterprises.

CapMan supports the Ten Principles of the UN Global Compact (UNGC) on human rights, labour, environment and anti-corruption. We are committed to making the UNGC and its Principles part of the strategy, culture and day-to-day operations.

Calculations and methodologies

The information provided in this statement has been reported by investee companies representing 60% of the current value of investee companies. The remaining 40% is based on modelled data provided by a third-party service provider. The information reported for real estate assets has been calculated by a third-party consultant and is based on actual usage information as well as modelled data. This statement covers the funds managed by CapMan AIFM which have been established or open for new investments after the SFDR came into force on 10 March 2021 (excluding funds of funds CWS IP I& II and CapMan Tre Smeder funds, for which PAI data was not available).