

ANNUAL REPORT 2025

Sustainability Statement



Sustainability Statement

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CapMan's Sustainability Statement 2025

CapMan's vision is to become the most responsible Nordic private asset company, and we are actively shaping the society through the investments we make. As an active and significant owner, we are ideally positioned to drive change towards well governed, environmentally, and socially sustainable businesses and assets. Our impact comes through decisions, target-setting and finding opportunities to mitigate societal and environmental challenges.

In our 2025 sustainability statement, we continue to take into account the European Sustainability Reporting Standards (ESRS) while monitoring developments in the Corporate Sustainability Reporting Directive (CSRD). Following recent updates in Finnish legislation, CSRD obligations for CapMan are now postponed until at least the 2027 financial year. Discussions on reporting scope and revisions to ESRS datapoints are ongoing, and final requirements have not yet been confirmed. In this context, CapMan maintains the reporting structure established in the 2024 statement. The 2025 report updates disclosures with 2025 data and events, ensuring consistency and relevance while remaining prepared to incorporate any future regulatory changes.

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BP-1 General basis for preparation of sustainability statements

The sustainability statement for CapMan is prepared on a consolidated basis, aligning with the scope of consolidation used for the financial statements. This approach ensures consistency and coherence across all CapMan's reporting. The sustainability statement addresses CapMan's own operations¹ while also considering the upstream and downstream value chains.

BP-2 Disclosures in relation to specific circumstances

CapMan defines short-term time horizons as applicable to the current financial year, medium-term as up to five years, and long-term as more than five years, as defined in ESRS 1 section 6.4. The metrics include value chain data estimated using indirect sources, such as commute habits surveys, car rental usage, hotel stays and waste related GHG emissions estimations. For scope 3, Category 15, Investments, the data provided by our portfolio companies is unaudited, introducing a degree of uncertainty. We gather this data annually, expecting that the information adheres to the GHG Protocol. Following recent updates in Finnish legislation, CSRD obligations for CapMan are postponed until at least the 2027 financial year. Given the ongoing discussions on reporting scope and revisions to ESRS datapoints, the 2025 report retains the structure and approach established in the 2024 sustainability statement. Disclosures have been updated to reflect 2025 data and events, while remaining ready to incorporate any future changes to ESRS requirements and reporting scope.

¹ When the report refers to 'own operations' for CapMan Plc, it focuses on the activities of CapMan Plc, including its investment operations, fund management, and services, while excluding the funds, portfolio companies, and investments that are part of the broader value chain.

GOV-1 The role of the administrative, management and supervisory bodies

CapMan's commitment to responsible business practices is reflected in its governance structures. CapMan values that its members of the Board of Directors (the "Board") have diverse backgrounds taking into account the competencies that are relevant for CapMan's business, such as know-how of the financial sector. The aim is for the Board to consist of representatives of different genders and age groups, that the Board members have versatile educational and professional backgrounds and that the Board of Directors as a whole has sufficient experience from working in international environments. CapMan considers that the composition of its Board is in its current form sufficiently aligned with the objectives set for the diversity of the Board composition. The diversity of CapMan's Board supports a broad perspective on sustainability opportunities, including diversity and active ownership.

The Board consists of six non-executive members, with no employee representatives on the Board. In 2025 the Board included 50% women and 50% men, and members aged between 47 and 69. Their educational backgrounds were relevant to the company's operations, and they had experience from both international and local operating environments. The same applied in year 2024. 83% of the Board members are independent. The Audit and Risk Committee, which consists of independent members, is responsible for overseeing impacts, risks, and opportunities. The responsibilities and tasks of the Audit and Risk Committee are described in more detail in the Charter of the Committee.

The Board approves long-term strategic Group-level sustainability objectives and priorities, oversees key sustainability risks, and approves the Group-wide remuneration policy, including how it links with sustainability criteria. Further the Board is responsible for the proper organisation of CapMan's operations, ensuring that the company has the appropriate sustainability organisation. The Board has established committees to ensure efficient preparation of the matter under its responsibility, namely Audit and Risk Committee and People and Remuneration Committee. The committees assist the Board by preparing matters falling within the competence of the Board. The committees generally do not have autonomous decision-making power, but the Board makes the decisions within its competence collectively.

The Audit and Risk Committee monitors closely and addresses sustainability matters such as sustainability reporting, KPI monitoring, and risk management. The committee's expertise in financial and business management supports effective oversight of these areas. The People and Remuneration Committee in turn assists the Board in remuneration matters aligning remuneration principles with the company's strategy and long-term goals, including sustainability targets.

The Management Group acts as CapMan's Sustainability steering group, agreeing on the high-level action plan for the execution of the Board-approved long-term strategic sustainability objectives and priorities. The inclusion of Head of Sustainability in the Management Group ensures that sustainability matters are integrated into CapMan's strategy and operations. Investment teams are represented in the Management Group and are committed to the sustainability action plans agreed within the CapMan Group. Investment teams are responsible for implementing the sustainability investment policies in their operations, formulating and implementing fund-level sustainability strategies, and integrating

the CapMan sustainability approach and standards in their investments. Each investment team has appointed at least one member whose responsibilities encompass sustainability-related matters and who actively participates in Group-wide sustainability initiatives.

The Head of Sustainability, as part of the Management team, has overall responsibility for the development and implementation of CapMan's group-level sustainability strategy, setting more detailed short-term sustainability targets, and developing sustainability operations within CapMan. The Head of Sustainability is also responsible for training CapMan personnel on sustainability-related matters. Sustainability issues are further managed by the Sustainability team as well as the Sustainability working group, consisting of representatives of CapMan's investment teams and support functions.

The management of sustainability linked impacts, risks, and opportunities is an integral part of CapMan's governance model. Opportunities are analysed as part of the strategy work, and risks are assessed annually. Through CapMan's funds' investments, the company aims to improve real estate and infrastructure assets, protect, conserve and enhance natural capital, and build successful companies. CapMan integrates its Sustainability Standards throughout the investment processes as described in the Sustainable Investment Policy.

The Board together with the CEO, oversees the setting of targets related to material impacts, risks, and opportunities, ensuring they align with the company's risk management policy. This entails among others maintaining a good reputation, minimising compliance and conduct risks, and ensuring the continuity of operations by safeguarding critical functions.

Sustainability matters are addressed early in pre-investment process, and sustainability value protection and creation levers are included in business plans. Progress is monitored through various mechanisms, including annual asset level data gathering, asset level board meetings, quarterly and annual fund reporting to Limited Partners (LPs), as well as more broadly through CapMan reporting in annual and sustainability report, as well as through the Taskforce for Nature-related Financial Disclosures (TNFD) disclosures and the Principles for Responsible Investment (PRI) reporting.

CapMan's Board and CEO ensure the availability and development of appropriate skills and expertise to oversee sustainability matters through several mechanisms. The Shareholders' Nomination Board considers the size, composition, and diversity of the Board, focusing on areas of expertise beneficial to the company, including sustainability. The Board conducts an annual self-evaluation of its operations and working methods, which includes assessing the skills and expertise related to sustainability. The Board members are invited to participate in the regular sustainability trainings organised by CapMan. The Audit and Risk Committee, consisting of members of the Board of Directors, has introduced sustainability topics into its agenda, ensuring that sustainability skills are part of the oversight process.

CapMan's bodies possess and leverage sustainability-related expertise through diverse educational and professional backgrounds relevant to CapMan's operations. The Management Group includes the Head of Sustainability, who is responsible for coordinating sustainability efforts across the company.

GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

CapMan's Board and CEO are informed about material impacts, risks, and opportunities, as well as the implementation and effectiveness of policies, actions, metrics, and targets adopted to address them. The Board and the CEO play a crucial role in considering these factors when overseeing the company's strategy, decisions on major transactions, and the risk management process. The Board decides on the risk appetite and risk tolerance to ensure continuity of operations and optimise CapMan's ability to meet its objectives. In any decision-making, aspects such as impact on equity ratio, shareholder value, company image and reputation, legal and political impacts, safety, potential loss and profit ratio, and impact on personnel are considered from a risk perspective.

During the 2025 reporting period, CapMan conducted an update to its Double Materiality Assessment, in response to feedback from the 2024 pre-assurance review. The update focused on refining the assessment process and documentation, without affecting the outcomes. The material impacts, risks, and opportunities previously identified, including climate change adaptation, GHG emissions, diversity, active ownership, and business integrity, remain relevant and continue to provide a solid foundation for future reporting cycles. The updated assessment and its outcomes were presented to the Audit and Risk Committee.

CapMan's governance bodies ensure that appropriate mechanisms for performance monitoring and related reporting are in place through the roles of the Board and its committees. The Audit and Risk Committee monitors financial reporting, internal controls, and risk management systems, while the Remuneration Committee oversees executive remuneration and its alignment with strategic goals. Regular evaluations and audits, both internal and external, are conducted to assess the effectiveness of these mechanisms, ensuring compliance with laws and regulations and promoting good corporate governance practices.

GOV-3 Integration of sustainability-related performance in incentive schemes

CapMan has integrated sustainability- and climate-related performance into its incentive schemes and remuneration policies. The Long-Term Incentive Plan, known as the Performance Share Plan (PSP), is a three-year program that requires individual investments to be eligible for participation. Positions eligible for the PSP program include members of CapMan's management group, team leaders within Platform Functions (IT, Legal, Tax & Compliance, HR, Marketing, Fund Management, Risk & Valuation), and other key positions. The CEO can approve additional key positions for participation if deemed feasible.

The PSP program includes three sustainability-related targets: Environmental (specifically focusing on emission reductions), Employee Satisfaction, Remuneration, and Diversity. These targets are directly linked to the scoring of the PSP program. The PSP program's sustainability targets are divided equally, with each target accounting for 33% of the overall evaluation. The percentage of variable remuneration dependent on each sustainability-related target is 7.5% compared to the full PSP program.

For STI (short-term variable remuneration), the employee's performance review and grade impact the overall attainment of the bonus. Employees are evaluated based on personal targets set in the beginning of the year as well as against performance, including sustainability-related, metrics. CapMan's performance evaluation process for its STI includes metrics linked to sustainable ways of working based on how employees demonstrate high ethics and transparency in day-to-day work, fostering and promoting a sustainable long-term solution that positively impact the work environment and supporting sound judgment in implementing solutions and decisions.

Short Term Incentive (STI) schemes are updated and reviewed annually, while the Long-Term Incentive (LTI) scheme is updated every three years. All remuneration schemes and components are first reviewed by CapMan's People and Remuneration Committee and ultimately approved by the Board.

GOV-5 Risk management and internal controls over sustainability reporting

CapMan follows ISO31000 for risk assessment, identifying risks continuously and conducting an annual risk assessment of key risks. This process includes identification, analysis, evaluation, treatment, monitoring, review, and reporting. Sustainability-related risks are analysed as part of each risk and as individual risks and are assessed against the likelihood, severity, risk appetite, and current controls, and finally mapped in a 1–7 matrix.

CapMan's risk management and internal control processes for sustainability reporting are designed to mitigate risks of material misstatement due to human error or incomplete data, ensuring the accuracy, transparency, and reliability of sustainability information. The main features include dedicated reporting software that enhances data transparency and traceability, specialised reporting units with experts responsible for their areas, internal reviews by management group members.

The main risks identified in relation to sustainability reporting are data quality and potential false claims and greenwashing by internal or external stakeholders. To mitigate these risks, CapMan promotes transparency on data quality and implements data assurance measures. The findings of risk assessments and internal controls are communicated to relevant teams, with material issues addressed by the respective teams. The implementation of these actions is monitored, and significant developments or concerns are reported to management.

Risk management prepares risk report and collects data of assurance activities of the group functions quarterly and reports its findings to the Audit & Risk Committee four times a year. Additionally, an annual risk assessment and risk mapping are conducted and reported to the Audit & Risk Committee during the fourth quarter of each year. This comprehensive approach ensures that CapMan effectively manages and mitigates sustainability-related risks, maintaining high standards of accuracy and reliability in its sustainability reporting.

IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities

In early 2025, CapMan conducted an update to its Double Materiality Assessment (DMA), building on the 2024 assessment of its most significant impacts on people and the environment (impact materiality), as well as the business risks and opportunities arising from sustainability topics (financial materiality). This strategic approach allows for effective evaluation of sustainability-related impacts, risks, and opportunities. The process focuses on specific activities, business relationships, and geographies with heightened risks by engaging relevant stakeholders and conducting sensitivity analyses. Impacts from both CapMan's operations and business relationships are considered through stakeholder engagement, quantitative assessments, and integration into the double materiality matrix. Consultations with affected stakeholders and external experts are included through interviews, surveys, workshops, and reviewing secondary sources. The Double Materiality Assessment process identifies, assesses, prioritises, and monitors potential and actual impacts on people and the environment. Impacts are prioritised based on their severity and likelihood, using criteria such as scale, scope, and remediability, ensuring that the most significant impacts are addressed first. The same prioritisation approach is applied to both risks and opportunities. The materiality threshold was established using summary statistics and quartiles from the collected data.

CapMan has conducted a salient human rights risk assessment for its operations and value chain, including a roadmap with prioritising actions to strengthen its human rights due diligence process. The Salient Human Rights Assessment conducted by third-party expert covered CapMan Plc and its investment teams, resulting in a roadmap for addressing potential gaps. With the exception of CapMan's Double Materiality Assessment, no separate comprehensive environmental assessment has been conducted for CapMan's own operations, the environmental impact of the operations (primarily GHG emissions and energy consumption) is monitored and deemed minor compared to the overall impacts when the investments are taken into account. Each investment within CapMan's value chain undergoes asset-specific due diligence to assess potential and actual impacts.

CapMan identifies risks in daily business operations and annually assesses key risks based on likelihood, impact, risk velocity, time-horizon, and degree of control. Moreover, the risks are compared with defined tolerance levels. The annual risk assessment process identifies significant risks and analyses changes in the risk environment. Each risk is analysed for possible causes and effects, and a risk matrix (1–7) is used to assess the likelihood, magnitude, and nature of the effects. Sustainability-related risks are prioritised alongside other types of risks, reflecting their importance to CapMan's overall strategy and operations.

The decision-making process involves the Board overseeing strategic and financial objectives, the CEO and Management Group managing daily operations, and committees such as the Audit and Risk Committee and Remuneration Committee overseeing financial reporting, internal controls, risk management, and executive remuneration. Internal control procedures include policies and processes for reliable and compliant reporting, a risk management framework, and whistleblowing channels for transparency and accountability.

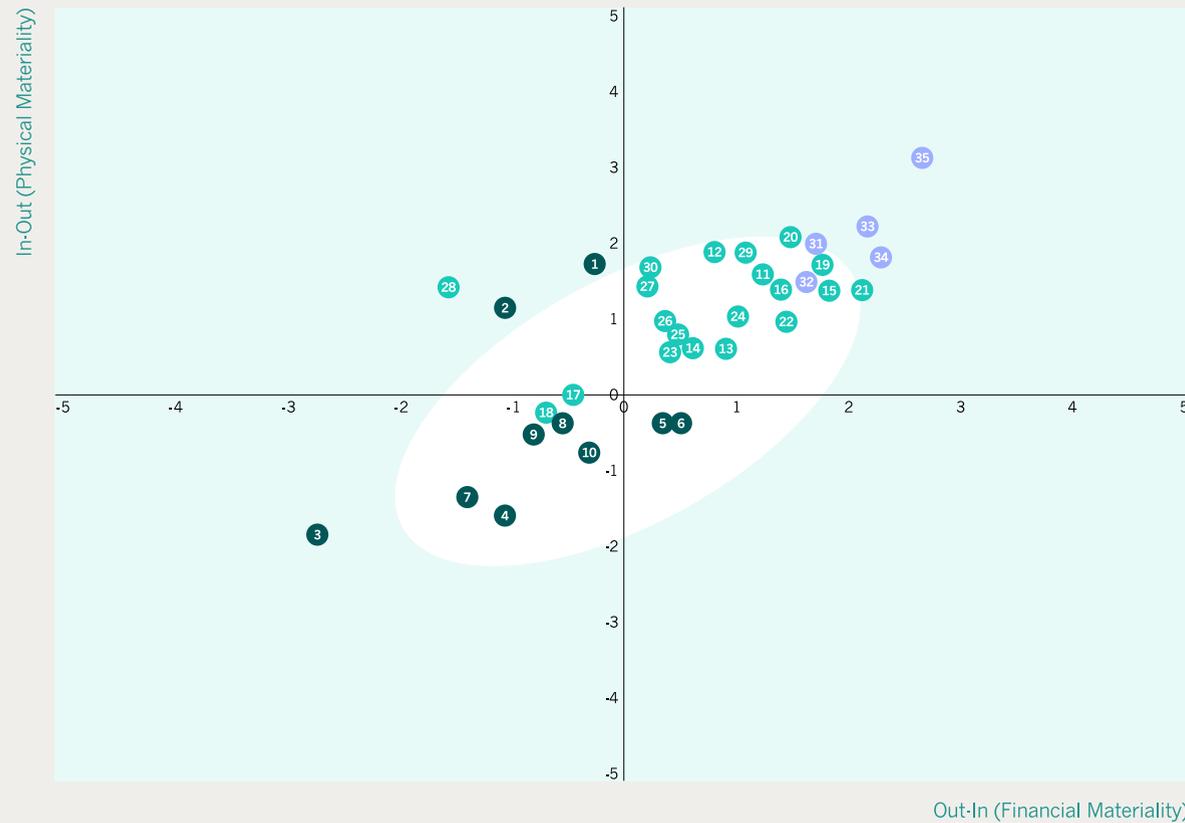
The process to identify, assess, and manage impacts and risks is integrated into CapMan's overall risk management framework, with continuous identification and annual assessment through risk mapping. The main way to identify, assess, and manage impacts and risks of investments is embedded in the investment process, with due diligence and risk mitigation actions reviewed by risk management. Opportunities are systematically evaluated and leveraged to align with CapMan's strategic goals and operational activities, embedded within strategic planning, operational processes, and the risk management framework.

CapMan uses several input parameters to identify, assess, and manage material impacts, risks, and opportunities, including previous assessments, gap analyses, stakeholder engagement, quantitative and qualitative data, and sensitivity analysis. The process aims to take into consideration the European Sustainability Reporting Standards (ESRS) and the Corporate Sustainability Reporting Directive (CSRD).

IRO-2 Disclosure requirements in ESRS covered by the undertaking’s sustainability statement

CapMan has determined the material information to be disclosed related to its impacts, risks, and opportunities through a Double Materiality Assessment. Material topics were identified based on their severity, scope, remediability, and likelihood, with specific thresholds set for short-term, medium-term, and long-term impacts. These thresholds ensured that only the most significant topics, with a moderate scale and regional scope, were included in the final assessment for reporting under the European Sustainability Reporting Standards (ESRS).

The Double Materiality Assessment determined that climate change is a material topic for CapMan, consistent with our previous sustainability strategy, including sustainability processes and priorities. However, pollution, water and marine resources, biodiversity and ecosystems, circular economy, workers in the value chain, affected communities, and consumers and end-users fell under our threshold for material topics following the methodology used in the assessment. The assessment confirmed that own workforce and business conduct are material topics for CapMan, aligning with our sustainability strategy and priorities. In preparing its sustainability statement, CapMan worked towards complying with the disclosure requirements set out by the European Sustainability Reporting Standards (ESRS) under the Corporate Sustainability Reporting Directive (CSRD).



- Environmental
 - Social
 - Governance
- 1 Climate change mitigation
 - 2 Climate change adaptation
 - 3 GHG emissions (Scope 1,2 & 3)
 - 4 Energy use/consumption
 - 5 Plant Life
 - 6 State of species
 - 7 Waste
 - 8 Substances of concern
 - 9 Water discharges
 - 10 Water consumption
 - 11 Gender equality and equal pay for work of equal value (own workforce)
 - 12 Gender equality and equal pay for work of equal value (value chain)
 - 13 Employment and inclusion of persons with disabilities (own workforce)
 - 14 Employment and inclusion of persons with disabilities (value chain)
 - 15 Diversity (own workforce)
 - 16 Diversity (value chain)
 - 17 Violence and harassment in the workplace (own workforce)
 - 18 Violence and harassment in the workplace (value chain)
 - 19 Job creation (own workforce)
 - 20 Job creation (value chain)
 - 21 Secure employment (own workforce)
 - 22 Secure employment (value chain)
 - 23 Collective bargaining (own workforce)
 - 24 Collective bargaining (value chain)
 - 25 Freedom of association (own workforce)
 - 26 Freedom of association (value chain)
 - 27 Non discrimination (Tenants)
 - 28 Affordable housing (Tenants)
 - 29 Health and safety (Tenants)
 - 30 Access to information/transparency (Tenants)
 - 31 Compliance with Laws & Regulations
 - 32 Board Diversity
 - 33 Business Integrity
 - 34 Corporate Culture
 - 35 Active Ownership

The key ESRS topics identified through Double Materiality Assessment include Climate Change (E1), Own Workforce (S1), and Business Conduct (G1).

Based on the outcomes of the materiality assessment and the sensitivity analysis, the topics outside of the oval area are the key ESG priorities of CapMan. The limit to determine material topics is oval, because it accounts for the uneven distribution of the analysed topics and takes the results of both the sensitivity analysis and the internal review into account. The oval area can therefore only be regarded as a visual representation. Diversity in the own workforce was added to this list, despite not being outside of the oval area, because this topic is relevant for CapMan as an employer. Affordable housing and rent on the other hand was excluded due to its unconventional nature. This topic might be further assessed when updating the DMA in the future.

The key ESRS topics addressed include Climate Change (E1), focusing on climate change adaptation and GHG emissions; Own Workforce (S1), emphasising diversity; and Business Conduct (G1), covering active ownership and business integrity. These topics were identified through the Double Materiality Assessment, ensuring both financial and non-financial impacts were considered.

SBM-1 Strategy, business model and value chain

CapMan does not engage in fossil fuel sector activities, chemical production, or tobacco production, and does not deal with controversial weapons. At the end of the reporting year, CapMan’s annual revenue from continuing operations was MEUR 63.0, and the total employee headcount, excluding contractors, 238.

REVENUE BY SIGNIFICANT ESRS SECTORS

Total revenue by significant ESRS sectors	Revenue
Oil and Gas	0
Coal, Quarries and Mining	0
Road Transport	0
Agriculture, Farming and Fisheries	0
Motor Vehicles	0
Energy Production and Utilities	0
Food and Beverages	0
Textiles, Accessories, Footwear and Jewellery	0

REVENUE FROM FOSSIL FUEL (COAL, OIL AND GAS) SECTOR

Revenue from coal, oil, gas, and fossil fuel	Revenue derived from sector
Coal	0
Oil	0
Gas	0
Fossil fuel	0

CapMan manages funds that invest in unlisted markets following a multi-strategy approach covering real estate, infrastructure, natural capital, real asset debt, minority and majority equity investments, and credit investments in private companies. We also provide wealth management solutions. Through our investments, we influence decisions and shape the development of assets and businesses, thereby impacting Nordic communities and the surroundings in which they

operate. Simultaneously, we provide returns for our investors and value to our shareholders. In addition, we invest from our own balance sheet in the private market asset classes, primarily into our own funds.

CapMan raises capital for its funds under management from a global base of professional investors, who serve as Limited Partners (LPs) in the funds. CapMan has approximately 200 institutional LPs as customers, with the largest group being pension funds, followed by asset managers, private investment companies, funds of funds, foundations, and other institutional investors, primary located in the Nordic and DACH regions. The ultimate beneficiaries of these customers include pension beneficiaries, insurance policyholders, households, academic institutions, and other stakeholders on whose behalf our LPs allocate capital. In addition, CapMan has approximately 350 private wealth clients.

The business model and value chain main inputs are capital raised from investors and human resources, including the expertise and skills of employees and advisors. We build long-term investor relationships through transparent communication, such as annual fund reporting meetings and quarterly reporting, and support the development of our employees through training and regular employee surveys. CapMan delivers financial returns for investors and fosters well-managed businesses that promote better conditions of the environment, society and drive economic growth and provide meaningful employment. We support the transition of everyday products, services, utilities, and properties towards more sustainable operating models, contributing to the creation of functional, high-quality environments and communities.

Our upstream value chain includes sourcing capital from professional investors and collaborating with key external stakeholders such as legal advisors, consultants, financial institutions, and other service providers who support our functions. The downstream value chain focuses on delivering value to investors, shareholders, the companies and assets we impact, as well as the communities and environments they are located in. As a fund manager and an advisor within the private assets sector, CapMan operates at the intersection of investors and Nordic real estate, infrastructure, natural capital, and unlisted companies.

CapMan’s vision is to become the most responsible Nordic private asset company. As active owners, we influence decision-making and activities across the CapMan Group including the assets and portfolio companies we manage. We steer our investments towards clear sustainability targets and strive to find opportunities that mitigate societal and environmental challenges. CapMan actively promotes sustainability themes that are material across all investments and tailors the approach to asset- and company-specific conditions. These themes include climate action based on science, operations that safeguard nature and the planetary boundaries, diverse, equitable, and inclusive businesses that provide meaningful work, human rights throughout the value chain, and accountability and transparency.

The long-term nature of private assets investing enables us to support the transition of our portfolio toward more resilient and sustainable assets. Across our investment strategies – including real estate, infrastructure, natural capital, real asset debt, and private equity – we apply an active-ownership approach that integrates sustainability into value creation throughout the investment lifecycle. This approach positions CapMan to promote well-governed and environmentally and

socially sustainable businesses while delivering attractive returns for our investors. Our strategy and sustainability themes are aligned with previously conducted Double Materiality Assessments for CapMan as an investor and for CapMan Real Estate.

SBM-2 Interests and views of stakeholders

CapMan's key stakeholders include the Board and the Management Group, investors, shareholders, and employees. Additionally, government and public sector entities, such as the Financial Supervisory Authority (FinFSA), banks, portfolio companies, real assets, private asset stakeholders like real estate tenants, local communities, and partners involved in the value chain are also important. CapMan engages actively with these key stakeholders through regular communication, reporting, and events for investors. These include transparent disclosures such as quarterly reporting for shareholders, professional development initiatives and wellbeing surveys for employees, close collaboration with entrepreneurs and management for portfolio companies, and consultations and tenant satisfaction surveys for asset stakeholders. Employees are also supported with professional development opportunities and wellbeing initiatives.

The purpose of CapMan's stakeholder engagement is to build trust, foster long-term relationships, align the interests of stakeholders with the organisation's goals, and support value creation. The outcomes of stakeholder engagement are integrated into decision-making processes and operational strategies to ensure alignment with stakeholder needs and expectations. This engagement helps identify opportunities, address concerns, and promote transparency in operations.

CapMan's key stakeholders are understood to prioritise sustainable value creation, business integrity, strong financial performance, and ethical business conduct. Employees value professional growth, wellbeing, and an inclusive work environment, while tenants focus on affordable housing and well-maintained properties. CapMan's Board and the CEO are informed about the views and interests of affected stakeholders regarding sustainability-related impacts through regular updates and reports. The Head of Sustainability is part of the Management Group that acts as CapMan's Sustainability steering group.

SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

CapMan's Double Materiality Assessment identified several key Environmental, Social, and Governance (ESG) topics, including Climate Change (E1), Own Workforce (S1), Business Conduct (G1), in addition to the General Disclosures (ESRS 2). These topics are integral to CapMan's strategy and business model, influencing both financial and non-financial impacts.

The material impacts identified include climate change adaptation and GHG emissions. Climate change adaptation is concentrated in the downstream value chain, particularly in the operations of private assets and portfolio companies, where measures are implemented to mitigate climate risks and enhance resilience. GHG emissions are concentrated both in CapMan's own operations and across the value chain, with the majority occurring in scope 3, Category 15 investments. The material negative and positive impacts of climate change adaptation and GHG emissions on people and

the environment are also considered. Employment and inclusion are concentrated in CapMan's operations and downstream value chain, promoting diversity and inclusion within the workforce and encouraging portfolio companies to adopt inclusive employment practices.

The material risks and opportunities identified include climate change adaptation, GHG emissions, diversity, active ownership, and business integrity. Climate change adaptation represents both a risk and an opportunity downstream, particularly in portfolio companies, real estate assets, infrastructure projects, and timberland, where adapting to climate impacts is essential for resilience and value creation. GHG emissions pose risks upstream and downstream, including regulatory, reputational, and operational risks, but also present opportunities for energy efficiency improvements and transitioning to renewable energy. Diversity is a key opportunity in CapMan's operations and downstream in portfolio companies, enabling more inclusive work environments and enhancing decision-making. Active ownership is central to CapMan's business model, representing an opportunity to influence portfolio companies and assets positively through sustainability integration, driving long-term value creation. Business integrity is fundamental across all operations and value chain levels, mitigating risks associated with unethical behaviour while building trust with stakeholders and ensuring compliance with regulatory and societal expectations.

The current and anticipated effects of these material impacts, risks, and opportunities on CapMan's business model, value chain, strategy, and decision-making are significant. Climate change adaptation involves transition and physical risks in the value chain, with potential impacts on operations and investments. CapMan has set and validated near-term Science-Based Targets (SBTs) and a Net Zero target, integrating climate change into value preservation and creation plans for portfolios. GHG emissions impact both operations and the value chain, with efforts focused on reducing scope 2 and scope 3 emissions, as CapMan has not identified any scope 1 emissions. CapMan's diversity, equity, and inclusion (DEI) working group serves as a forum for discussing and implementing concrete measures to promote diversity and inclusion, setting gender targets and recruiting guidelines. Portfolio companies are encouraged to adopt DEI policies. Active ownership is the basis for all actions, delivering innovative solutions proactively and creating lasting value by working closely with stakeholders. Business integrity ensures long-term value creation by maintaining high ethical standards and transparency in operations and investments.

CapMan's material impacts are closely connected to our strategy and business model. Sustainability is a core component of CapMan's active ownership approach, investment processes, and value creation strategies. Material impacts, such as GHG emissions, arise directly from our activities, including managing portfolio companies, real estate, and infrastructure investments.

CapMan's material impacts are addressed through short-term, mid-term, and long-term goals outlined in our sustainability roadmap. These goals include immediate actions to integrate sustainability into investment processes, medium-term targets for reducing emissions and enhancing diversity, and the long-term objective of achieving net zero emissions by 2040.

CapMan has material impacts both through its activities and its business relationships. Through its own operations and investment activities, CapMan directly contributes to material impacts such as GHG emissions. Material impacts from business relationships arise through partnerships and oversight, such as the operations of portfolio companies, energy use by real estate tenants, and relationships with suppliers.

CapMan's material risks and opportunities currently affect our financial position, performance, and cash flows primarily through steering our investments towards sustainability targets, such as improving energy efficiency in real estate and infrastructure assets and integrating sustainable practices into portfolio companies' operations. These efforts can increase operational costs in the short term but are expected to enhance asset value and generate long-term financial returns. Additionally, climate-related risks such as regulatory changes or extreme weather events may impact portfolio performance, while opportunities like transitioning to renewable energy create new revenue streams and cost-saving potential.

Within the next annual reporting period, material risks such as regulatory changes related to climate change adaptation or emissions could lead to adjustments in the carrying amounts of assets. Opportunities arising from increased demand for sustainable investments could result in the repricing of assets.

The material impacts, risks, and opportunities recognised during the current reporting period are considered to be in line with those identified in the previous reporting period. Climate-related risks, including physical risks such as extreme weather events and transition risks arising from regulatory or technological changes, remain central to CapMan's assessments. These risks are primarily linked to the underlying assets in the private assets funds managed or invested in by CapMan. Opportunities related to active ownership, such as the integration of sustainability into value creation processes, and business integrity, including compliance with new regulatory requirements, were also recognised as material in the previous year.

CapMan has disclosed several sustainability-related material impacts, risks, and opportunities covered by the ESRS Disclosure requirements. These include climate change adaptation and GHG emissions (scope 1, 2, and 3) under E1 - Climate Change, diversity under S1 - Own Workforce, and active ownership and business integrity under G1 - Business Conduct. These disclosures aim to meet the European Sustainability Reporting Standards (ESRS).

Environmental information

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E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	19

SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

CapMan's strategy and business model are inherently adaptable to climate change due to the dynamic nature of our investment portfolio. This flexibility allows us to adjust and respond to climate-related impacts, risks, and opportunities across any time horizon.

IRO-1 Description of the processes to identify and assess material climate-related impacts, risks and opportunities

CapMan assesses the impact of climate-related matters and whether climate-related risks could result in material adjustments to the Group's financial statements. Physical climate risks, such as extreme weather, and transition climate risks, such as regulatory or technological changes, could impact CapMan's financial performance due to effects on investment portfolio valuations.

CapMan's operations have negligible climate-related impacts compared to the value chain, so the focus is on identifying and assessing the impacts of the investment portfolio. This is conducted through asset-specific due diligence and value creation plans during the pre-investment and holding periods. Furthermore, CapMan's own operations are not heavily reliant on physical assets, resulting in low exposure to physical climate risks, which are monitored by internal teams. The internal teams also monitor climate transition risks that stem from e.g. new environmental and sustainability-related regulatory requirements in the financial sector.

Different investment areas have tailored approaches regarding the physical and transition risks and opportunities. CapMan Real Estate captures greenhouse gas (GHG) and energy-related risks as part of the Carbon Risk Real Estate Monitor (CRREM) assessments for transition risks and applies an EU Taxonomy aligned approach for physical climate risks. Further, physical and transition climate-related risks are covered by the due diligence process for all new real estate acquisitions, with physical risk assessments updated every 5–10 years. The CRREM assessment for energy and carbon (transition) risks is conducted annually for standing investments. CapMan Infra calculates its GHG emissions and conducts EU Taxonomy aligned climate risk and vulnerability assessments under different scenarios, providing financial values at risk for the underlying assets. CapMan Natural Capital calculates GHG emissions and sinks and will be assessing the physical and transition risks of its assets in the near future. CapMan Private Equity assesses the materiality of climate risks for each asset during due diligence and regularly calculates its GHG emissions.

Scenario analysis is used to inform the identification and assessment of physical hazards and risks over short, medium, and long-term horizons. Short-term refers to periods of 12 months or less, and long-term to periods longer than 12 months, with no defined medium-term horizon for accounting purposes. CapMan uses EU Taxonomy aligned climate risk scenarios for the Real Estate and Infra investment portfolio, employing one to four physical risk scenarios to determine and assess hazards, identify significant risks, and provide mitigation and adaptation actions. If the sensitivity to a hazard is assessed as high or medium-high, adaptation solutions are integrated in the asset's business plan. All 28 climate-related hazards listed in the EU Taxonomy are assessed, with heat waves and heavy rain or flooding being the most common hazards for properties, while hazards vary for infrastructure assets.

Transition events have also been identified over short, medium, and long-term horizons for the Real Estate and Infra investments. For the Real Estate portfolio, transition risks are identified and evaluated using the CRREM tool, which assesses energy intensity and GHG emissions intensity of properties against CRREM's pre-defined 1.5DC pathways until 2050. The assessment considers property type and location and is conducted annually for all standing properties in the Real Estate portfolio. Continuous work is done to improve energy efficiency and reduce GHG emissions of the Real Estate portfolio. For the Infra portfolio, a materiality survey was issued to stakeholders to identify the most material transition risks, ranking overall transition risks (policy, technology, market, reputation) and elements within each risk as set out in the Task force on Climate-Related Financial Disclosure (TCFD) Recommendations. Additional analysis by a third-party assessed the overall vulnerability on a portfolio and asset level under three International Energy Agency-aligned scenarios, using a scoring system for adaptive capacity and sensitivity. Interviews with portfolio companies qualitatively assessed adaptive capacity and sensitivity, while desk-based research identified additional policy, technological, or market-related risks and wider transition risks to infrastructure in the countries where the Infra portfolio operates.

E1-1 Transition plan for climate change mitigation

CapMan's near-term GHG emissions reduction targets follow the Private Equity Sector Science-Based Target (SBT) Guidance and have been validated by the Science Based Targets Initiative (SBTi). CapMan has not identified scope 1 emissions. In accordance with SBTi Private Equity Sector SBT Guidance, CapMan is reducing its scope 2 emissions by using renewable electricity targeted at 100% by 2030. CapMan's four largest offices (Helsinki, Stockholm, Jyväskylä,

and Copenhagen) have been certified with the WWF Green Office environmental management system. For scope 3 emissions, business travel is targeted to be reduced by 25% per FTE by 2032. Starting in 2025, all carbon from business-related flights will be compensated using carbon removal services from a third party. For investments, CapMan follows the SBTi Private Equity Sector SBT Guidance where eligible portfolio companies will be setting their own SBTs. In 2025, the SBTi validated CapMan Real Estate's net-zero climate targets in accordance with the Buildings Criteria. The aligned long-term target is to reduce in-use operational GHG emissions by 90.90% per square meter by 2035, upfront embodied GHG emissions by 96.59% per square meter by 2040 and in-use upfront embodied GHG emissions by 99.80% per square meter by 2040. The target captures construction phase GHG emissions from both new construction and major renovation projects. The previous near-term 2032 SBT CapMan Real Estate target was to reduce GHG emission intensity per square meter by 72% in commercial properties and by 50% in residential properties from a 2021 baseline. Note that the new target doesn't specify the division between property types, such as commercial and residential properties.

CapMan has committed to manage its investments in line with net-zero by 2040 and CapMan Real Estate has set an operational carbon target for 2035 and an in-use and upfront embodied carbon target for 2040. Eligible portfolio companies set SBTs and develop plans on how to achieve them, and the real estate portfolio has a sustainability strategy 2023–2026 with concrete measures to implement. All of the above are part of the portfolio companies' and Real Estate's overall business strategy.

Calculations for operational or capital expenditures related to CapMan's own operations have not been performed, as they are not considered significant for the implementation of the action plans related to emission reductions. For Real Estate investments, the financial implications from transition and climate risk assessments are scheduled to be completed in 2026. For the Real Estate portfolio, we have started the work to fully understand these implications. For the Infra and Natural Capital portfolio, the focus has been on risk assessments rather than complete climate transition plans. Nevertheless, the Infra portfolio's climate risk and vulnerability assessments have calculated the financial value at risk under different scenarios, as well as the potential adaptation costs. For other investment teams, this is portfolio company-specific and decided on a case-by-case basis.

While CapMan's operations are not eligible to be aligned with the EU Taxonomy, certain CapMan assets are. Depending on fund investment strategies and fund SFDR classification, those assets need to disclose eligibility and alignment to the EU Taxonomy. CapMan Real Estate has a target to align 40% of its assets under management with the EU Taxonomy criteria by 2026. CapMan Nordic Infrastructure Fund II assets are eligible to be aligned with the EU Taxonomy, but the alignment depends on management decisions before these portfolio companies establish individual plans on how to fulfil the technical and screening criteria. CapMan Natural Capital has assessed the eligibility and alignment potential of the Dasos Sustainable Forest III Fund.

During 2025, CapMan has established a Climate and Nature Transition Plan, including own operations as well as investments. The plan has been established with the latest Task force on Nature related Financial Disclosures (TNFD) recommendations. CapMan has no significant capital expenditures for coal, oil, or gas-related economic activities. Parts of our transition approach has been approved by the CEO, while the Board has approved the overall direction of CapMan Plc's sustainability efforts. As stated above, CapMan has not identified any scope 1 emissions. We track the annual scope 2 GHG emissions, as well as the following material scope 3 categories: purchased goods and services, activities related to fuel and energy, business travel, employee commuting, and investments. Regarding the investment category, we track the GHG emissions from our real estate, infrastructure and natural capital assets, as well as portfolio companies (including the number of companies that have set SBTs), and disclose this information annually.

E1-2 Policies related to climate change mitigation and adaptation

CapMan has adopted policies and guidelines related to climate change for our investments, operations and business-related travel. As part of our vision to become the most responsible Nordic private asset company, we aim to reduce our scope 1² and 2 emissions in line with the SBTi Private Equity Sector SBT Guidance and have been validated by the SBTi. Additionally, CapMan has committed to manage its assets in line with net-zero by 2040, with specific net zero targets for real estate operational carbon by 2035 and real estate in-use and upfront embodied carbon by 2040.

In accordance with the SBTi Private Equity Sector SBT Guidance, we are reducing our scope 2 emissions by using renewable electricity, with a target of 100% by 2030. Our four largest offices have been certified with the WWF Green Office program, which also encompasses other selected sustainability matters. For operational scope 3 emissions, we aim to reduce business travel by 25% per full-time employee by 2032. Starting in 2025, carbon emissions from business-related flights are compensated using carbon removal services from a third party.

Eligible portfolio companies are required to set SBTs and develop plans to achieve them. The real estate portfolio has a sustainability strategy in place until 2026, with concrete measures to implement. Additionally, the SBTi has validated CapMan Real Estate's net zero climate targets in accordance with the Buildings Criteria in 2025. All these initiatives are integral to the overall business strategy of our portfolio companies and real estate assets.

We track our annual scope 2 GHG emissions, as well as several scope 3 categories, including purchased goods and services, activities related to fuel and energy, business travel, employee commuting, and investments. For our investments, as part of our validated SBTs, in addition to tracking the real estate GHG emissions reductions, we also monitor the number of companies that have set SBTs, and disclose this information annually. Our sustainable investment policy addresses various sustainability matters, including climate change mitigation, climate change adaptation, energy efficiency, and renewable energy deployment.

² CapMan has not identified any scope 1 emissions.

POLICIES RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION

Policies adopted to manage material impacts, risks and opportunities related to climate change mitigation and adaptation	Description of the key contents of the policy	Description of the scope of the policy or exclusions	The most senior level in the undertaking's organisation that is accountable for the implementation of the policy	If relevant, a reference to the third-party standards or initiatives the undertaking commits to respect through the implementation of the policy	If relevant, a description of the consideration given to the interests of key stakeholders in setting the policy
CapMan's Sustainable Investment Policy	CapMan's Sustainable Investment Policy outlines the integration of environmental, social, and governance (ESG) criteria into investment processes, detailing specific standards and commitments, such as adherence to the UN Global Compact and the Science Based Targets initiative.	The policy applies to all investment decisions and ownership practices of funds managed by CapMan AIFM Ltd, including real estate, infrastructure, natural capital, real asset debt, private equity, private debt, and wealth services. It excludes any investments that fall within restricted areas defined by CapMan.	The Management Group of CapMan Plc is accountable for the implementation of the policy and for addressing any non-compliance with or deviations from the policy.	CapMan commits to several third-party standards and initiatives, including the Principles for Responsible Investment, the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and the Science Based Targets initiative.	The policy considers the interests of key stakeholders, including investors, portfolio companies, tenants, and local communities, by integrating their preferences and feedback into sustainability practices and reporting.
Restriction list	CapMan's Restriction list outlines restricted investment areas, including controversial weapons, fossil fuels, gambling, and violations of international humanitarian law.	The policy applies to all new real estate lease contracts (from December 2023) and all new infrastructure private equity, and balance sheet investments (from December 2022).	The Management Group of CapMan Plc is accountable for the implementation of the policy and for addressing any non-compliance with or deviations from the Restriction list.	The policy aligns with international humanitarian law and standards regarding human rights, the environment, and anti-corruption.	The policy ensures that investments do not support activities harmful to society or the environment, reflecting the interests of investors, tenants, and local communities.
CapMan's Code of Conduct	CapMan's Code of Conduct establishes principles for decision-making and actions, emphasizing compliance with laws, ethical behaviour, responsible investment, anti-bribery, anti-corruption, and respect for human rights.	The Code applies to all CapMan employees and covers all business activities, ensuring that decisions and actions align with CapMan's values and ethical standards.	The Board of Directors of CapMan Plc is accountable for the implementation of the Code of Conduct.	The Code aligns with the UN Global Compact, the Principles for Responsible Investment, the UN Guiding Principles on Business and Human Rights, and other international standards.	The Code considers the interests of stakeholders by promoting fair dealing, transparency, and respect for human rights, ensuring that CapMan's operations do not adversely impact employees, investors, portfolio companies, and the broader community.
CapMan's Supplier Code of Conduct	CapMan's Supplier Code of Conduct establishes principles and ethical standards of business behaviour that CapMan Plc expects of its business partners.	The Supplier Code of Conduct applies to CapMan's Suppliers and the personnel employed or engaged by the Suppliers.	The Management Group of CapMan Plc is accountable for the implementation of the Supplier Code of Conduct and for addressing any non-compliance.	The Supplier Code of Conduct is based on CapMan's Code of Conduct, and it sets out the general principles, rather than complete set of detailed rules that cover all situations	The Supplier Code of Conduct considers the interests of stakeholders by promoting fair dealing, transparency, and respect for human rights, ensuring that CapMan's supply chain does not adversely impact the environment, its employees and the broader community.

E1-3 Actions and resources in relation to climate change policies

CapMan's ability to implement climate change mitigation and adaptation actions depends entirely on the availability and allocation of resources.

ACTIONS AND RESOURCES IN RELATION TO CLIMATE CHANGE POLICIES

Key actions taken and planned to achieve climate-related policy objectives and targets	Key action taken in the reporting year or planned for the future	Decarbonisation lever	The scope of the key actions	The time horizons under which the undertaking intends to complete each key action
CapMan Plc net-zero target	Action planned for the future	Target setting	CapMan operations and eligible investments	2040
Travel policy	Action taken in the reporting year	Travel guidance	The scope covers all business-related travel for CapMan staff	2032
Renewable electricity in operations	Action taken in the reporting year	Engaging with office locations owners to procure green electricity and purchasing Renewable Energy Certificates (REC).	The scope covers GHG scope 2, electricity consumption in CapMan's offices	2030
CapMan Real Estate net-zero climate target	Validated long-term targets by the SBTi	Target setting	Standing assets for in-use GHG, major renovation and new construction projects for upfront embodied carbon	2035 for in-use GHG 2040 for upfront GHG
Setting SBTs on portfolio company level	Action taken in the reporting year	Portfolio companies setting Science-based Targets	The scope covers GHG scope 3 Category 15 Investments, in accordance with the SBTi PE Guidance	2032
Carbon removal from business-related travel emissions (flying)	Action taken in the reporting year	Removing carbon equalling the total GHG emissions from business related flying.	The scope covers GHG scope 3 Category 6, Business Travel emissions	2025
Several energy efficiency measures in real estate assets, installation of on-site renewables and purchase of renewable energy	Action taken in the reporting year	Improving energy efficiency, increasing the amount of on-site generated renewable energy and the transition to fossil-free/ renewable energy	The scope covers GHG scope 3 Category 15 Investments, in accordance with the SBTi guidance	2032, 2035 and 2040
Climate and Nature Transition Plan	Action taken in the reporting year	Roadmap towards transitioning operations, assets and investments to net zero GHG emissions and halting nature loss	CapMan operations and eligible investments	Annual progress update

E1-4 Targets related to climate change mitigation and adaptation

CapMan is dedicated to monitoring GHG emissions and has established SBTs in line with the 1.5-degree goal of the Paris Agreement, to drive our mitigation and adaptation policies. We aim to reduce absolute scope 1 and 2 GHG emissions by 51% by 2032 from a 2021 base year, aligning with our commitment to net-zero by 2040. This near-term target is absolute and covers scope 1 and 2 emissions, following the SBTi Private Equity Sector SBT Guidance.

We are committed to increasing our annual sourcing of renewable electricity from 46% in 2021 to 100% by 2030. This absolute target for scope 2 emissions is also guided by the SBTi.

For our real estate portfolio, we aim to reduce GHG emissions from residential buildings by 50% per square meter by 2032 from a 2021 base year. Similarly, we target a 72% reduction for service (commercial) buildings within the same timeframe. These relative targets for CapMan scope 3 emissions (category 15 investments). Additionally, in 2025, the Science Based Targets initiative validated CapMan Real Estate's net zero climate targets in accordance with the Buildings Criteria. These targets include real estate targets net-zero in-use operational carbon by 2035 and in-use and upfront embodied carbon by 2040.

By 2027, 54.5% of eligible infrastructure and private equity investments will set science-based targets, with a goal of reaching 100% by 2032. During 2025 Hydroware, Netox and Innofactor had their targets validated, increasing the total share of the eligible portfolio with SBTs from 8% to 21%. We manage our infrastructure and private equity investments in line with our net-zero by 2040 commitment, covering scope 1, 2, and 3 emissions. This commitment is guided by the Institutional Investors Group on Climate Change Net Zero Investment Framework.

Additionally, we aim to reduce business-related travel emissions by 25% per FTE by 2032, starting from a 2022 baseline of 782 kg/FTE. This relative target for scope 3 emissions is calculated as non-science-based (i.e. not SBTi aligned) but aims for an annual reduction of 2.8%.

We monitor progress annually, disclose it, and ensure all GHGs are covered, maintaining a gross GHG emissions target.

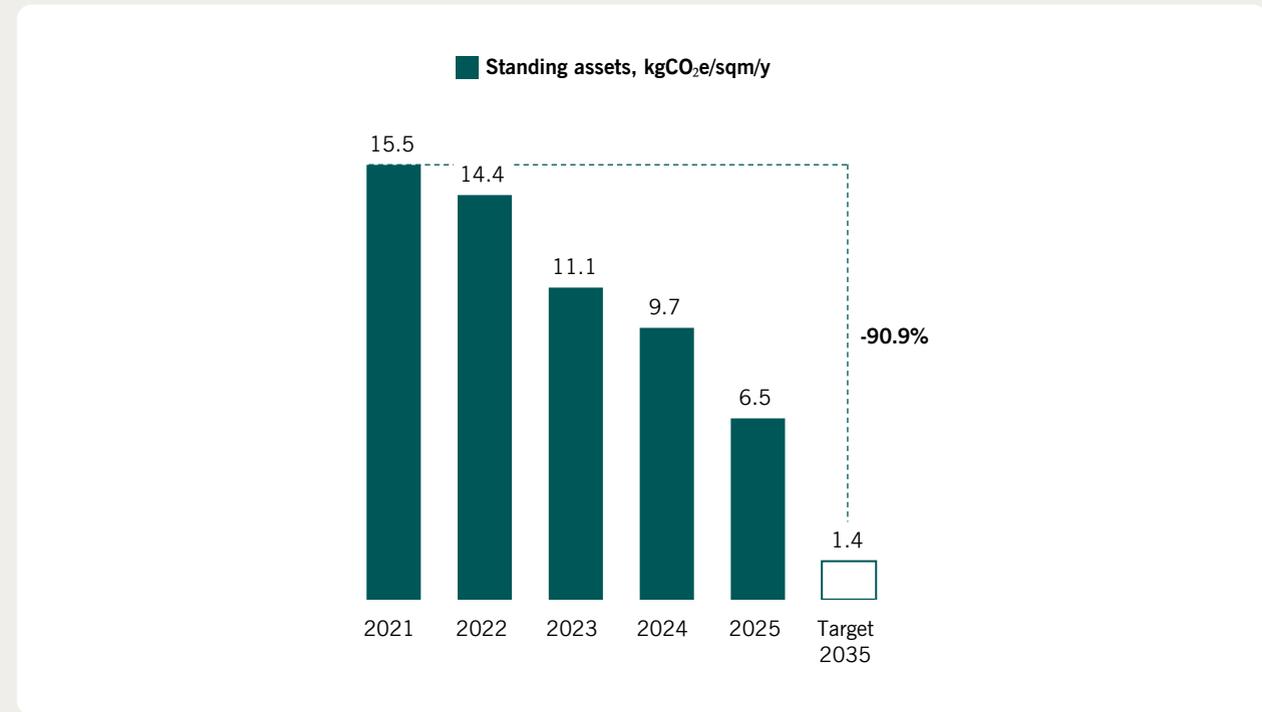
Our past progress, as disclosed in our Annual Reports, shows that our 2023 scope 1-2 emissions were 64 tCO₂e and 69 tCO₂e in 2024. Scope 3 Category 1–14 (i.e. Business travel, Employee commuting, Purchased goods and services, Fuel and energy activities) emissions were 4,399 tCO₂e in 2023 and 18,589 tCO₂e in 2024. The difference can be explained from the use of estimates for business flights in 2024. Category 15 investments remain dynamic and comparable progress cannot be disclosed in a meaningful manner.

To achieve our GHG emission reduction targets, we will engage with the landlords of our leased office spaces to procure renewable electricity and heating, and purchase certificates or origin for renewable electricity for scope 1 and 2 emissions. For scope 3, category 6 business travel, we are implementing a travel policy and coupling it with carbon compensation for all business-related flights. For scope 3, Category 15 investments, we are working with eligible portfolio companies to set their own SBTs. Our Real Estate portfolio's asset management plans include actions to reduce GHG emissions according to the targets.

Real Estate in-use operational emissions targets, progress and methodology

OPERATIONAL GHG EMISSIONS, REAL ESTATE, STANDING ASSETS, KGCO₂E/SQM/Y

	2021	2022	2023	2024	2025	Target 2035
Total (all property types, kgCO ₂ e/sqm/y)	15.5	14.4	11.1	9.7	6.5	1.4



In 2025, CapMan Real Estate received validation of its net zero climate targets from the Science Based Targets initiative (SBTi). The in-use operational GHG emission intensity for real estate assets is calculated in line with SBTi Buildings Criteria and has decreased by 58% compared to 2021 and 33% compared to 2024.³ The reduction can be explained by the following initiatives:

- Energy efficiency improvements of the properties including optimising BMS systems, installing LED lighting, optimising the operational hours at the properties, upgrading heat pumps and replacing windows with more energy-efficient versions.
- Increasing on-site renewable energy production, including the installation of ground-source heat pumps and photovoltaic systems.
- Increasing the purchase of renewable and/or fossil-free energy, particularly renewable heating in residential properties.
- CapMan encourages its tenants to purchase renewable electricity. This encouragement is stated in the sustainability appendices to both residential and commercial lease contracts.

In addition, the Danish location-based emission factors for electricity are significantly lower in 2025 compared to 2024 (51 gCO₂/kWh compared to 99 gCO₂/kWh). The GHG emission intensity (kgCO₂e/sqm) of real estate covers the operational energy consumption and possible refrigerant leaks. Any transmission losses from upstream value chain of energy providers have not been included in the GHG emission intensity calculations.

Market-based emission factors have been applied to the energy purchased by the landlord and by commercial tenants, where the factor is known. When the energy source or supplier is unknown, location-based emission factors have been applied. The location-based emission factors have been provided by a third party (sources: Fingrid and AIB). The refrigerant emission factors have been provided by a third party (source: Defra).

All properties have been included except for major renovation or new construction projects. However, embodied GHG emissions from completed major renovation and new construction projects are reported in the next chapter. Properties that have been acquired or sold during the year are included but adjusted to the ownership period. The intensity figures are based on gross floor areas. The gross area is measured differently in different countries, following national standards.

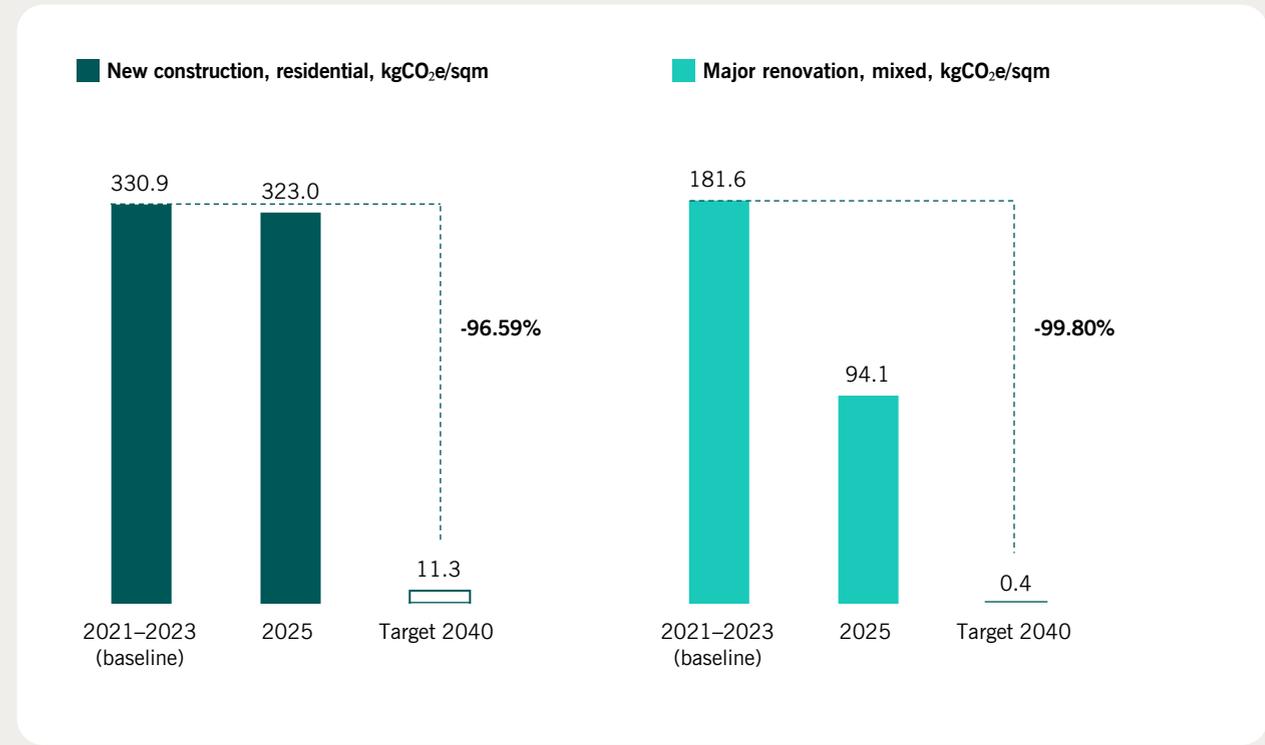
For properties where data is available only for common areas and not tenant areas, CapMan has calculated estimates to capture whole-building energy consumption. The estimates are based on energy intensity values per country and property type, using third-party energy factors (Motiva). The CapMan Investments Sustainability Report 2025 could include additional measured data and fewer estimations, which could result in updated real estate in-use operational GHG emissions figures.

³ The previous near-term 2032 SBT CapMan Real Estate target was to reduce GHG emission intensity per square meter by 72% in commercial properties and by 50% in residential properties from a 2021 baseline. By end of 2025 a reduction of 53% in commercial and 80% in residential properties had been achieved.

Real Estate in-use and upfront embodied GHG emissions targets, progress and methodology

EMBODIED GHG EMISSIONS, REAL ESTATE, DEVELOPMENT PROJECTS, LIFE CYCLE STAGES A1-A5

	2021-2023 (baseline)	2025	Target 2040
New construction, residential, kgCO ₂ e/sqm	330.86	323.00	11.28
Major renovation, mixed, kgCO ₂ e/sqm	181.60	94.14	0.36



In this report, CapMan reports for the first time the in-use and upfront embodied GHG emissions of its real estate investments – major renovation (in-use embodied) and new construction (upfront embodied) projects.

CapMan Real Estate’s GHG reduction targets for embodied GHG emissions are validated by the Science Based Targets initiative under the SBTi Buildings Criteria. For new construction projects, the target is to reduce upfront embodied GHG emissions by 96.59% by 2040 relative to 2021–2023 baseline. For major renovation projects, the target is a 99.80% reduction in in-use embodied GHG emissions, using the same baseline period.

In 2025, the upfront embodied emissions were reduced by 2.4% and in-use embodied emissions by 48.2%, compared to the baseline. The reduction of in-use embodied emissions is due to differences in renovation scope compared to the baseline. The reporting covers embodied emissions from the life-cycle modules A1–A5 (production and construction) for three projects completed during the year: one residential new-built project in Sweden and two major hotel renovation projects – one in Sweden and one in Finland.

The new construction project is reported as a standalone figure, while the two renovation projects are aggregated and presented as an average value, reflecting the differing nature of new construction and major renovations.

To establish a representative and sufficiently robust baseline, LCA (life cycle assessment) results from new construction and major renovation projects completed across the 2021-2023 baseline years and covering various property types were averaged. This approach ensures an adequate sample size that reflects typical construction practices across the portfolio during the baseline period.

The LCA scope includes life cycle stages A1–A5. Biogenic carbon is not accounted for. Going forward, CapMan Real Estate will continue refining its embodied-emissions calculation methods and work towards harmonisation of LCA methodologies across the Nordic region, where notable methodological differences remain.

CapMan Real Estate is at an early stage in systematically addressing construction-phase emissions and acknowledges the challenges associated with the industry. Nevertheless, the company is committed to strengthening its capabilities, improving processes, and embedding best practices to reduce embodied carbon in a cost-effective and scalable manner.

E1-6 Gross scopes 1, 2, 3 and total GHG emissions

CapMan Group discloses its GHG emissions as CO₂ equivalents (CO₂eq) in line with the GHG Protocol.

GROSS SCOPES 1, 2, 3 AND TOTAL GHG EMISSIONS

	2025	2024
Gross Scope 1 GHG emissions (tCO ₂ eq)	0	0
Gross location-based scope 2 GHG emissions (tCO ₂ eq)	70	97
Gross market-based scope 2 GHG emissions (tCO ₂ eq)	69	70
Total Gross indirect (scope 3) GHG emissions (tCO ₂ eq)	322,860	258,251
Purchased goods and services (scope 3, tCO ₂ eq)	1,521	1,475
Fuel and energy-related activities (not included in Scope 1 or scope 2) (scope 3, tCO ₂ eq)	23	32
Business traveling (scope 3, tCO ₂ eq)	428 ⁴	17,005
Employee commuting (scope 3, tCO ₂ eq)	67	77
Investments (scope 3, tCO ₂ eq)	320,821 ⁵	239,662 ⁵
Total GHG emissions (tCO ₂ eq)	322,929	258,321

⁴ The differences in emissions can be explained by the fact that in 2024 modelled estimates for business related flights were used, whereas in 2025 actual data was obtained.

⁵ Due to the time lag between portfolio investments disclosing their emissions and the publication of CapMan's Annual Report, CapMan consistently uses emissions data from the preceding reporting year, as it is considered to provide the most accurate representation available at the time of reporting. The real estate portfolio upfront and in-use embodied carbon GHG emissions were calculated in 2025 and are reported on the previous page.

Data coverage and data quality continue to improve each year, driven by the ongoing enhancement of data collection and calculation processes. In addition, for business travel emissions CapMan is gradually including more activity-based GHG data and improving its estimations for employee commuting. As CapMan rents all of its office space, scope 2 emissions are dependent on energy providers contracted by the owners. As a result, variations between years reflect these improvements rather than any substantial changes to the underlying processes. The net revenue used to calculate GHG intensity is EUR 63.0.

CapMan accounts for direct scope 1 emissions from its own operations, indirect scope 2 emissions from its own activities as well as scope 3 emissions from purchased goods and services, business travel, employee commuting and the share of emissions from the investments that it manages. CapMan has not identified scope 1 emissions.⁶ CapMan's scope 2 emissions calculations are based on actual energy consumption data. These emissions from scope 2 are calculated both using location-based and market-based methodologies, using the latest available conversion factors. CapMan's scope 3 emissions (Category 1 - 14, except for 6) are spend-based, using the latest available conversion factors. Scope 3 Category 6, Business travel, is obtained from CapMan's travel agent that uses activity-based GHG accounting. The

⁶ We calculate GHG emissions with a third-party service provider, who has not identified any material scope 1 emissions.

majority of CapMan's scope 3 emissions are generated through our investments. Scope 3 Category 15 emissions (investments) are calculated as follows: CapMan Real Estate scope includes refrigerant leakages and purchased energy (both by landlord and tenant). The detailed methodology can be found from chapter 'Real Estate in-use operational emissions targets, progress and methodology'. CapMan Infra uses a combination of actual energy consumption and production and modelling to derive its GHG emissions. CapMan Natural Capital uses a third-party for calculating GHG emissions and carbon sequestration, following international good practices based on the IPCC Guidelines for National GHG Accounting (2006, and Refinement from 2019). CapMan Private Equity relies on self-reporting from portfolio companies and modelling to determine GHG emissions. The addition of one more investment team in 2025 (Real Asset Debt) will have an impact on CapMan's scope 3 (Category 15) emissions in the future once the team has calculated their financed emissions. These changes will increase the overall scope 3 Category 15 emissions.

DISAGGREGATION OF GHG EMISSIONS

Disaggregation Description	Type of disaggregation	Scope	GHG emissions (tonnes of CO ₂ eq)
Scope 2 emissions	Source and country	Scope 2 location-based emissions	70
Scope 2 emissions	Source and country	Scope 2 market-based emissions	69
Scope 3 emissions	Category	Scope 3 emissions	322,860

Significant events and changes in circumstances relevant to GHG emissions

Due to a lag between the portfolio investments disclosing their emissions and CapMan's Annual Report, in the table above we have used the realized data from 2024 scope 3 Category 15 emissions, as we believe it provides the most accurate reflection. The 2025 scope 3 Category 15 emissions for all portfolio investments will be provided in a publication following the Annual Report.

If there are significant changes the publication following the Annual Report will feature more accurate information. Otherwise, the published data will remain the same in both reports.

Biogenic emissions

Biogenic emissions of CO₂ from the combustion or bio-degradation of biomass not included in scope 1 GHG emissions are zero. Biogenic emissions of CO₂ from the combustion or bio-degradation of biomass not included in scope 2 GHG emissions are also zero.

GROSS SCOPES 1, 2, 3 AND TOTAL GHG EMISSIONS - SCOPE 3 GHG EMISSIONS (GHG PROTOCOL)

Scope 3 Categories	Reason(s) why scope 3 category is significant
Purchased goods and services	Financial spend, Magnitude of estimated GHG emissions, Influence
Fuel and energy-related activities (not included in scope 1 or scope 2)	Other, Financial spend
Business traveling	Magnitude of estimated GHG emissions, Financial spend, Stakeholder views
Employee commuting	Other
Investments	Magnitude of estimated GHG emissions, Financial spend, Influence, Related transition risks and opportunities, Stakeholder views, Sector guidance

CapMan’s approach to calculating and reporting GHG emissions involves detailed methodologies and specific boundaries for different categories. For scope 3 GHG emissions in categories 1 to 14, CapMan employed a third party to perform spend-based calculations. In Category 15, real estate specific emissions accounting principles are described in chapter “Real estate in-use operational emissions targets, progress and methodology”. The Infra portfolio’s emissions are calculated using market, location, and spend-based methods by an external provider. The Natural Capital portfolio uses specific emissions accounting principles described at the beginning of this chapter. For the Private Equity portfolio, modelling is used when portfolio companies cannot provide their GHG emissions calculations.

Certain scope 3 GHG emissions categories have been excluded from CapMan’s calculations as they were not deemed material. Specifically, embodied GHG emissions for real estate investments are not included in CapMan Plc’s scope 3 Category 15 2025 figures. The 2025 embodied GHG emissions are reported separately in the chapter “Real Estate in-use and upfront embodied GHG emissions targets, progress and methodology”. This comprehensive approach ensures that CapMan’s GHG emissions reporting is thorough and aligned with industry standards, providing a clear and accurate representation of their environmental impact.

GROSS SCOPES 1, 2, 3 AND TOTAL GHG EMISSIONS - SCOPE 3 GHG EMISSIONS (ISO 14064-1)

Iso 140641 scope 3 Category	Scope 3 GHG emissions (metric tonnes of CO ₂ eq)
Indirect emissions by transport and distribution downstream	0
Indirect emissions from purchased products	1,521
Emissions from the use stage of the product	0
Indirect emissions caused by services used by the organization	0
Indirect emissions caused by employees commuting to work	67
Indirect emissions caused by business travel	428
Other indirect emissions	320,821

E1-9 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

Parts of CapMan’s organisation’s real estate and natural capital assets under management are at material physical risk before considering climate change adaptation actions. The Infra portfolio is not subject to major material physical risk, and these assessments have not been conducted for the other asset classes. The Real Asset Debt portfolio has not conducted a physical and transition risk assessment. CapMan’s operations have no assets at material risk, but managed assets with material physical risk are located in Finland, Denmark, Norway, Sweden, the Baltics, Spain, Portugal, and Ireland. For its Real Estate and Infra portfolio, CapMan has assessed the anticipated financial effects of some of its assets at material physical risk, identifying asset value at risk and costs for climate adaptation solutions. In real estate, these assessments apply to the whole building, identifying both long-term and short-term risks, and are conducted in accordance with the EU Taxonomy. CapMan Infra assesses the anticipated financial effects of its assets at material physical risk in its EU Taxonomy aligned climate risk and vulnerability assessments, identifying portfolio company value at risk and costs for climate adaptation solutions.

CapMan is exposed to transition risks arising from e.g. new environmental and sustainability-related regulatory requirements in the financial sector, and potential transition climate-related risks are mainly linked to risks in underlying assets. These risks vary due to asset class and company-specific factors. The Real Estate, Infra, and the Private Equity portfolios can face stranded assets. For the real estate investments, material transition risks are assessed with the 1.5DC CRREM energy and GHG emission pathways, based on property type and location. The misalignment year of each asset is identified, and actions are taken to improve misalignment years. Transition risk assessments have been conducted for Infra investment team, assessing the value at risk from transition events under three different scenarios (International Energy Agency Net Zero Emissions by 2050 Scenario, International Energy Agency Sustainable Development Scenario, and International Energy Agency Beyond 2°C Scenario) in the short, medium, and long term. Limitations can be related to data availability and quality used in the modelling.

Social information

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SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

CapMan includes people in its own workforce who can be materially impacted by the undertaking within the scope of disclosure under ESRS 2. Groups subject to material impacts include general employees.

CapMan's activities that result in positive developments include promoting diversity, equity, and inclusion (DEI). This is a material topic from the social perspective, positively affecting employees.

Opportunities include benefits from promoting workforce diversity. CapMan's transition to more sustainable operations will have several material impacts on workers. These include enhancing sustainability training, changing operational

practices, promoting diversity and inclusion, improving health and safety, creating new job opportunities, and encouraging active employee participation in sustainability initiatives. These changes are part of CapMan's efforts to reduce negative environmental impacts.

CapMan's operations are not at significant risk of incidents of forced labour, compulsory labour, or child labour. However, CapMan remains vigilant and ensures strict compliance with labour laws and ethical standards, as well as labour standards set out in the ten principles of the UN Global Compact, across all operations and the value chain to prevent any such incidents. In 2023 and 2024, CapMan conducted an assessment of salient human rights risks and impacts, evaluating policies, governance, and management processes. This assessment was benchmarked to authoritative international standards such as the UN Guiding Principles, OECD Guidelines, ILO Conventions and the International Bill of Human Rights.

Based on the Double Materiality Assessment, CapMan has identified diversity as a material opportunity specifically related to certain groups within its workforce. This includes, but is not limited to, promoting gender equality and equal pay for work of equal value, as well as the employment and inclusion of persons with disabilities. These opportunities are seen as beneficial for enhancing inclusivity and equity within the organisation.

S1-1 Policies related to own workforce

CapMan has adopted a robust set of policies and guidelines for its workforce, reviewed and updated annually, with training sessions held for new and existing employees. CapMan's Corporate People Policies consolidate all applicable workforce policies, including the Code of Conduct, Travel & Expense Policies, Leave of Absence Policies, Foreign Assignment Policy, Social Media Guidelines, Recruitment and Onboarding, Work Environment, Health and Safety, Training and Development, Discrimination and Equal Opportunities Policy, Anti-Harassment and Bullying Policy, Fairness Procedure, Whistleblowing Policy, and Processing of Personal Data. These policies highlight the employee legal framework, describing principles, practices, and obligations towards the workforce and each other. The policies are approved by the company's Board of Directors or the management group. Additionally, CapMan has a Supplier Code of Conduct for internal procurement processes.

The Corporate Remuneration Policy outlines the company's compensation philosophy, clarifying compensation components and emphasising fairness and equity in salary structures and schemes. This policy supports CapMan's strategy in attracting, retaining, developing, and rewarding employees who enhance shareholder and fund investor value, fostering a performance culture. It ensures the credibility, effectiveness, sustainability, and fairness of remuneration practices, balancing fixed and variable pay. With a focus on sustainability, the policy underscores CapMan's commitment to responsible business practices and sustainability metrics. It aligns the remuneration structure with sound risk management, counteracting excessive risk-taking, including sustainability risks, and adhering to the investment policies of CapMan's funds. The policy also ensures that total variable remuneration does not compromise the maintenance of a sound capital base. This policy is approved by the company's Board of Directors.

Local Employee Handbooks for Finland, Sweden, and Denmark are subsets of the Corporate People Policies, detailing local nuances. These handbooks define local practices applicable to employees, covering information on vacation, public holidays, local insurances, benefits, and more. The CapMan management group approves any updates drafted by Human Resources (HR).

The purpose of the Code of Conduct is to establish basic principles governing decision-making and actions, ensuring compliance with laws and regulations while promoting ethical behaviour. Each CapMan employee is responsible for adhering to the Code, and managers are expected to demonstrate its importance through their behaviour and guidance. The Code is non-exhaustive, and any breaches must be rectified promptly.

As a member of the UN Global Compact and the Principles for Responsible Investment, CapMan promotes environmental and social sustainability in all business practices and investments. We adhere to national and international standards protecting human rights, labour laws, work environment, privacy, fair wages, and working hours. Our internal policies enforce and clarify practices related to compensation, occupational safety, non-discrimination, and privacy. CapMan has assigned responsibility at the top management level for equal treatment and opportunities in employment, linking advancement to desired performance in this area. Staff training on non-discrimination policies and practices is provided, and adjustments to the physical environment ensure health and safety for all.

CapMan adheres to the safety plans and accident prevention measures implemented in the office buildings in which it operates, as provided by the property owners. In addition, all new employees receive training on office practices and safety measures to ensure a secure working environment. The Occupational Safety and Health Committees regularly review this topic and take necessary actions whenever required, reinforcing our commitment to accident prevention and employee well-being.

CapMan engages with employees through Group-level information events, team-level discussions, and individual meetings. Annual employee surveys collect feedback to plan actions, and performance and development discussions are held regularly. Occupational Health and Safety committees allow employees to engage directly with employer representatives on work environment, safety, and health matters.

CapMan upholds the highest standards related to human rights, following European and local laws and regulations. Our policies, including the Corporate People Policies, Remuneration Policies, Whistleblowing Policy, Anti-Bribery and Corruption (ABC) Policy, and Supplier Code of Conduct, protect human rights within the organisation. CapMan's policies are aligned with internationally recognised instruments such as the Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights, and International Labour Organisation's Declaration on Fundamental Principles and Rights at Work. We conduct due diligence checks to identify and mitigate adverse human rights impacts and have established a grievance mechanism (whistleblowing policy) in line with the UNGPs. Our Anti-Bribery and Corruption (ABC) Policy reflects the standards of the Principles for Responsible Investment and UN Global Compact, with rigorous compliance procedures to prevent corruption and bribery.

CapMan conducts business in compliance with applicable legislation and expects equivalent compliance from its suppliers. Such targets are ensured by the internal procurement processes described in the Supplier Code of Conduct. Our Data Protection and Privacy Policy complies with the General Data Protection Regulation (GDPR) of the European Union, ensuring lawful and transparent processing of personal data.

CapMan's Corporate People Policies outline our general code of conduct, emphasising respect and inclusion. Our diversity, equity and inclusion (DEI) efforts are highlighted in sections on recruiting principles, work environment policy, discrimination and equal opportunities policy, anti-harassment and bullying policy, and fairness procedure. Policies are implemented through specific procedures to prevent, mitigate, and address discrimination, and to advance diversity and inclusion.

CapMan keeps up-to-date records on recruitment, training, and promotion, providing a transparent view of opportunities for employees. Grievance procedures are in place to address complaints and handle appeals, promoting access to skills development. Significant changes to policies are communicated through onboarding sessions, online training courses, intranet libraries, topical campaigns, and internal communications.

S1-2 Processes for engaging with own workers and workers' representatives about impacts

CapMan continuously encourages close cooperation with its employees and their representatives where applicable. Although CapMan is not part of a local Collective Bargaining Agreement and does not hold regular union consultations, it engages with employees through various means. These include regular personnel information sessions, annual employee surveys, Occupational Safety and Health committees, and local safety representatives. For example, in Finland, the Occupational Safety and Health Committee is a formal representative body with elected employee representatives and appointed employer representatives. The committee cooperates in occupational safety and health matters in the own workforce.

CapMan also involves employees in different working groups, such as the DEI working group, which has representatives from most of CapMan's offices and is sponsored by one Board member. The DEI working group discuss initiatives, projects, or ideas that may increase DEI at the Group level and provides practical guidelines and recommendations to management in their quarterly discussion forums. Additionally, CapMan has an Employee Performance Process that starts with setting targets for the year, followed by a formal check-in in the third quarter, and ends with a performance discussion. Leadership and manager assessments are also conducted, where employees evaluate their managers' leadership styles and skills.

Engagement with employees occurs through structured annual processes such as employee surveys, leadership surveys, and performance discussions. Regular meetings are held with the Occupational Safety and Health Committee in Finland and the DEI working group. Ad-hoc working groups or focus groups are formed on specific matters, such as the renewal of the corporate brand identity or office moves. Regular team and manager one-on-one discussions address ongoing issues, allowing managers to take input and act accordingly.

CapMan's top management, including the CEO, CFO, COO, Head of Fund Investor Relations, Head of Sustainability, and all Managing Partners, have operational responsibility for ensuring that engagement happens and that results inform the company's approach. Group-wide actions may be taken depending on the matters at hand, but the most effective way is to address challenges directly within the teams where they originate.

CapMan does not have a Global Framework Agreement with its workers' representatives but complies with local laws and regulations to fulfil cooperation with employee representatives where applicable. The effectiveness of engagement with employees is assessed through various forms, including annual employee surveys, performance discussions, feedback questionnaires after events, and formal occupational safety and health committee meetings. Location-specific sessions, interactive staff information channels, and focus groups are also used to gather feedback and to plan actions accordingly.

To gain insight into the perspectives of vulnerable or marginalised employees, CapMan uses employee surveys and conducts workshops or focus groups based on survey results. In 2023, a Wellbeing Survey was conducted, and individual responses "at risk" were automatically submitted to the Occupational Health Care Provider. The DEI workgroup focuses on underrepresented minorities and actions that may create a more inclusive workplace. External network participation at the CEO level, such as the L20 network, also helps share market studies and best practices.

CapMan promotes open feedback and regularly engages with its workforce to address potential barriers to engagement. This is done through annual employee surveys, regular surveys from internal events, employee information sessions, focus groups, and exit interviews. The Occupational Safety and Health committee also plays a role in this process.

CapMan fosters a transparent and effective communication plan for all internal material, using the intranet and teams channels to share information. Regular personnel information sessions are held to keep the workforce updated on business matters. Training sessions and focus groups are arranged when needed, especially if a new policy is being adopted.

Conflicting interests among employees are managed through training on policies, annual declarations of holdings, restrictions on secondary employment, and robust processes to handle potential conflicts of interest. A whistleblowing mechanism is also in place.

CapMan is committed to upholding human rights for all stakeholders engaged in its workforce. The company has implemented a set of policies aligned with international standards and best practices. Human rights are embedded in corporate policies, and the leadership team fully endorses these policies. Employees receive training on human rights principles, and suppliers are required to adhere to the human rights policy. A whistleblowing channel is available for reporting concerns, and all reports are investigated promptly and thoroughly.

The effectiveness of processes for engaging with the workforce is assessed using metrics from CapMan's HR and relevant survey platforms, managed by vetted third-party providers.

S1-3 Processes to remediate negative impacts and channels for own workers to raise concerns

CapMan is dedicated to maintaining a responsible and ethical approach to workforce management. If we identify a situation where we have caused or contributed to a material negative impact on our workforce, we follow a structured approach to provide or contribute to an effective remedy. We promptly acknowledge any involvement in the negative impact and commit to taking appropriate remedial action. We engage with affected employees and, where relevant, their representatives to understand the full extent of the impact and their perspectives on appropriate remedies. Remedies are designed to be proportionate to the impact and aim to restore the situation as much as possible.

To ensure the effectiveness of our remedies, we have established an assessment process. This process includes utilising feedback mechanisms, such as employee surveys and exit interviews, to identify areas where our workforce may be experiencing negative impacts. Once a negative impact is identified, we develop and implement targeted remedies, which may include policy changes, additional training, or process improvements.

We track both our company's eNPS score as well as our Inclusion Index annually, and continuously monitor our absence rate, turnover rate, and any continuous illnesses. We actively seek feedback from our employees regarding the perceived effectiveness of the remedies through follow-up surveys and focus groups. Based on the feedback and data collected, we continuously refine and improve our remedies to better address the negative impacts.

CapMan is committed to fostering an open and supportive environment where employees feel comfortable raising their concerns or needs. Several channels are in place to ensure that employees can voice any concerns they may have effectively and receive timely support. These channels include direct communication with managers, where employees are encouraged to report any concerns or needs directly to their managers, who will commence appropriate actions to address the issues raised. Employees can also reach out to the HR team for any issues that require further escalation or if they feel uncomfortable discussing their concerns with their managers.

The Early Support Policy aims to identify and respond to signs of concern over employees' well-being as early as possible, including voicing a concern, early intervention, and early support dialogue between the manager and the employee to support employees and maintain their working capacity. CapMan promotes a culture of shared responsibility. While managers have a central role in identifying and addressing early support needs, employees are equally expected to take an active role in maintaining their own wellbeing. In the Early Support process, this includes being open to dialogue, participating in support discussions, and engaging with agreed-upon measures and follow-ups. If an employee has a concern over the well-being of a colleague, they can raise the issue with the HR team or the manager.

Each location maintains local occupational safety representation or committees following local legislation, where employees can contact their local representative for concerns about occupational safety. These concerns are addressed in accordance with local procedures and legislation. Employees should first try to resolve complaints informally with their manager. If unresolved, they can escalate the issue in accordance with the Fairness Procedure to the HR team for a

formal meeting, followed by a hearing with the second line manager if needed. If still unresolved, the final appeal can be made to the CEO, who will make a final ruling.

CapMan has established a standardised whistleblowing channel and arranged a proper handling process for whistleblowing reports, which includes non-retaliation towards the person using this channel. The whistleblowing channel can be used to alert CapMan about serious misconducts or abuses affecting individuals, our company/organisation, society, or the environment. Whistleblowing can be done by any person openly or anonymously through a whistleblowing channel or in person.

CapMan supports the availability of these channels through various processes. The whistleblowing channel tracks all reported cases, and each case is investigated properly, reported to the management group, the Board, and, if applicable, to external supervisory bodies. Results of annual surveys are addressed on Group, Function, and Team levels, where suitable actions are discussed, agreed upon, and actioned in close cooperation with the relevant team or group.

Local Occupational Safety and Health committees meet regularly to plan and follow through on topical matters, such as occupational health care services, fire inspections, first-aid training, and work environment issues, with meeting minutes kept for each meeting. Robust training on whistleblowing for all new joiners, as well as refresher courses (both in class and online), are provided to the whole workforce. Policies regarding protection against retaliation for individuals that use channels to raise concerns or needs are in place. CapMan has well-established channels for its workforce to raise concerns in the form of a whistleblowing channel (accessible to all), annual employee surveys, and close cooperation with employee representatives where applicable. Third-party mechanisms are accessible to all own workforce, and employees and their representatives are able to access channels at the level of the undertaking they are employed by or contracted to work for.

CapMan maintains a low hierarchy that encourages employees to speak directly with their managers or any member of management about work-related concerns, suggestions, or observations regarding material impacts. While not bound by a collective bargaining agreement, CapMan supports the election or appointment of employee representatives who can bring forward collective concerns and suggestions to management. Regular meetings between management and the workforce are held to discuss operational changes, health and safety issues, environmental impacts, and any other material aspects of their work. Various feedback mechanisms, such as employee surveys, are provided to anonymously or openly share insights and concerns. CapMan has established a whistleblowing policy that protects employees who report unethical or illegal activities, ensuring that workers can raise concerns about material impacts without fear of retaliation. Regular training sessions are conducted to educate employees about their rights and the channels available to them for addressing material impacts, including information on how to effectively use these channels.

S1-4 Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

CapMan is committed to addressing material impacts, managing risks, and pursuing opportunities related to its workforce. For talent development, we plan to continue strengthening leadership and critical skills, as well as fostering an inclusive and sustainable culture between 2026 and 2027. In talent recruitment, our focus is on attracting more diverse candidates by utilising modern systems to minimise recruitment bias, training hiring managers on bias, and applying new language in recruitment materials, also between 2026 and 2027. Our diversity, equity, and inclusion (DEI) strategy includes the establishment of an internal DEI working group to discuss topical actions and plans, adopting the Rooney Rule⁷ in the gender split of top candidates in recruitment, and harmonising family leave policies to further support employees. This is an ongoing long-term effort starting in 2024 to properly embed the DEI mindset within the organisation.

CapMan follows a structured approach to manage impacts, risks, and opportunities related to our own workforce. This includes engaging with workers and their representatives to gather insights and feedback directly from those affected. We have specific processes in place to remediate negative impacts, ensuring that any negative impact is promptly addressed and resolved. We take action on material impacts by identifying and mitigating material risks and pursuing opportunities, assessing the severity, scale, and scope of the impact to determine the appropriate response. We set targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities, which help us measure the effectiveness of our actions and ensure continuous improvement.

To mitigate material risks arising from impacts and dependencies on our workforce, we focus on talent development, diversity and inclusion, employee well-being, technology and automation, and succession planning. Ongoing monitoring with managers and team heads, as well as annual evaluations and surveys, help us track performance and well-being, diversity and inclusion targets, and the impacts of technology and automation projects. We plan to continue rolling out targeted training programs and career development paths for employees at all levels, structure leadership development to foster the next generation of company leaders, sharpen recruitment efforts to reach a broader target group, and conduct workshops and sessions on the importance of diversity and inclusion. Our wellness programs include mental health support, fitness, and health screenings, and we foster a flexible work environment that supports work-life balance. We invest in digital tools and platforms to enhance collaboration and efficiency and identify repetitive tasks that can be automated, freeing up employees for more strategic work.

⁷ The Rooney Rule mandates at least one minority candidate in the interview process. CapMan strives to uphold the Rooney Rule in all its recruitment processes and also asks any external recruitment party to uphold to the same standard. The Rooney Rule does not dictate which candidate is selected, however it provides a better frame for pursuing a more diverse pool of candidates at the final stages of the recruitment process.

CapMan's Code of Conduct and Supplier Code of Conduct outline our commitments to human rights, labour rights, environmental management, and business ethics, ensuring that our practices are aligned with our values and do not cause or contribute to negative impacts. We conduct annual employee surveys to gather feedback on workplace well-being, culture, and other relevant topics, using the results to identify areas for improvement and ensure alignment with employee needs and expectations. In connection with our strategy and budget planning process, funds and resources are allocated for actions in the coming years, including HR systems and functionalities, learning and development programs, DEI actions, and updated survey tools for better data management and follow-ups.

We continuously cooperate with our workforce and employee representatives on matters related to the work environment, job satisfaction, and well-being, actively monitoring absence and overtime to proactively support the workforce. We review and update our internal policies to align with changing surroundings and legal requirements, increasing transparency where applicable. Targeted training ensures proper upskilling and understanding of compliance, while our DEI working group, HR, management, and the Board drive progress within the DEI area. Regular health check-ups, annual flu vaccines, and wellness programs, along with occupational health care insurances, help maintain workforce health.

CapMan offers programs and incentives to enhance positive material impacts, including employee health, well-being, family leave policies, ergonomic checks, and social events. Employee surveys on satisfaction, workload, leadership, and ICT ensure the workforce has the necessary systems and tools, while the Legal, Tax & Compliance organisation surveys workforce understanding of policies and training needs. In 2025 our eNPS score was 51 and our Inclusion Index at 81 (corresponding to a score of 4.15, following CapMan's adoption of a new survey tool with an updated method for reporting results), indicating high employee satisfaction and engagement. We aim to continuously improve our actions towards the workforce, with strategic initiatives for 2026 focusing on workforce development, career path clarification, DEI understanding, and better systems and tools for efficient work and data management.

CapMan implements its social responsibility through the two foundations it administers. The CapMan for Good foundation shares the know-how and energy of CapMan's employees and networks to society through, among other things, mentoring. The Tukikummit foundation, on the other hand, wants to ensure that every young person has the opportunity to enjoy hobbies and to be part of a social context. By distributing grants to cover costs for hobbies, supporting studies, shared family experiences, travel expenses and providing monetary support for single-parent families, the foundation supports young people who are at risk of becoming marginalised due to their financial situation. During 2025, Tukikummit raised approximately 300,000 euros for work to prevent marginalisation and distributed grants for 300,000 euros. One of the main campaigns in 2025 that CapMan's employees took part in was the "Steps4Tukikummit", fostering physical activity during the working day and contributing to funds for Tukikummit. In total, Tukikummit has distributed 7.8 million euros and given grants for more than 23,000 children and young people in Finland since 2007.

Health lectures, breakfast meetings, and other inspirational sessions will further support physical activity and well-being. Workers and their representatives play a role in decisions regarding the design and implementation of programs aimed at

delivering positive impacts, with Occupational Safety and Health committees and DEI working groups meeting regularly to discuss and plan actions promoting employee well-being and a safe, inclusive workplace.

CapMan's internal functions involved in managing impacts include HR, Legal, Tax and Compliance, Sustainability, and IT. Actions taken include annual employee engagement processes, onboarding of new staff, recurring manager forums, IT training, Occupational Safety and Health Committee meetings, and DEI working group initiatives. These efforts ensure a safe work environment, a healthy workforce, and address any concerns raised by employees

S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

CapMan's targets are part of its sustainability strategy roadmap, aiming to manage material negative impacts, advance positive impacts, and address material risks and opportunities. The defined target levels include achieving an eNPS above 50, increasing diversity, equity, and inclusion (DEI) across CapMan by implementing a DEI working group, attaining an inclusion index score above 70, ensuring diversity among decision-makers with a maximum of 70% representation of any gender in new appointments to management teams, and promoting diversity among recruitments by applying the Rooney Rule in the gender split of top candidates. These targets are measured in absolute numerical values and cover employee satisfaction, perception of inclusion within the workforce, and new recruits.

The baseline values against which progress is measured include an eNPS of 58 and 43% of management team members being women, with the base year for measurement being 2022. The DEI working group was established in 2023, and the targets are monitored and reviewed annually. The eNPS is measured by asking employees to rate the likelihood of recommending CapMan on a scale of 0 to 10, with the score calculated by subtracting detractors from promoters. The inclusion index measures employee perceptions of uniqueness and belongingness, with the score based on the percentage of favourable results. The Rooney Rule aims to increase the number of minority gender candidates interviewed for permanent positions.

Performance against these targets is monitored through annual employee surveys, with further actions planned based on the results. The DEI working group, composed of members across teams, functions, seniorities, and geographic locations, provides practical guidelines and recommendations to management in biannual workshops. The group is sponsored by the Audit and Risk Committee Chair of CapMan's Board of Directors, with the goal of continuously increasing diversity, equity, and inclusion across CapMan, especially at the decision-making level. The inclusion index score is also measured annually, with actions taken based on the results. The gender split of top candidates is evaluated in each recruitment process, with a mid-term target of achieving a minimum 60%/40% gender split in management teams.

CapMan engages closely with its workforce and their representatives in setting targets, conducting an annual employee survey that includes elements such as eNPS, inclusion, belonging, and other topical themes like health and wellbeing. In Finland, the Occupational Safety and Health Committee, comprising employee and employer representatives, meets regularly to discuss various workforce-related topics. Employee representatives are elected for a term of two calendar

years at a time. In smaller offices, the appointed country head regularly meets with staff to discuss topical issues. The CapMan Group-wide DEI Working Group, sponsored by a CapMan Board member, meets bi-monthly to address DEI topics and drive change. Internal targets, such as the Rooney Rule for recruitment, are tracked by the HR team.

While the workforce or their representatives are not directly engaged in tracking performance against targets, they are involved in identifying lessons or improvements resulting from the company’s performance. The DEI Working Group has identified improvement areas related to recruitments, and the Occupational Safety and Health Committee focuses on actions such as early intervention training, first aid, office environment, and occupational health care.

The intended outcomes for CapMan’s employees include working in a sustainable, inclusive, and vibrant environment where they feel engaged and a sense of belonging, and where they feel a purpose in contributing towards a better Nordic society. These high-level items are incorporated into CapMan’s Corporate People Policy, which is supported by applicable policies and good cooperation with employees and their representatives.

S1-6 Characteristics of the undertaking’s employees

CapMan’s employee data is derived from the master HR system, which includes metrics such as headcount for both permanent and temporary (fixed-term) employees. The employee data is managed centrally and complies with General Data Protection Regulation (GDPR) guidelines. Employee data are reported as headcount, and the reporting period is 31 December 2025. Data related to disabilities and “at risk” categories are not available as CapMan does not collect such personal information. The total number of employees represented in the report includes all employees with an employment relationship with CapMan, both permanent and fixed-term. In the reporting period, CapMan had 221 permanent employees and 17 fixed-term employees, with an annual turnover of 6,2% of permanent employees. The definition “other” in gender break down tables is currently empty as CapMan does not have that definition in place in its master HR system. The option may be added later, pending a review of what information it may collect in the different countries of operations. The definition “other” in country breakdown, includes Denmark, Germany, Luxembourg, Norway and the United Kingdom. These locations employ less than 10% of CapMan’s workforce and thus combined under “other”.

EMPLOYEE HEADCOUNT BREAKDOWN BY GENDER⁸

Gender	Number of Employees
Male	147
Female	91
Other	0
Not reported	0
Total	238

EMPLOYEE HEADCOUNT BREAKDOWN BY COUNTRY

Gender	Number of Employees
Finland	157
Sweden	34
Other	47
Total	238

⁸ (50+ Employees in Countries Representing ≥10% of Total)

NUMBER OF EMPLOYEES (HEADCOUNT)⁹

Female	Male	Other	Not Disclosed	Total
Number of employees				
91	147	0	0	238
Number of permanent employees				
87	134	0	0	221
Number of temporary employees				
4	13	0	0	17
Number of non-guaranteed hours employees				
0	0	0	0	0
Number of full-time employees				
82	139	0	0	221
Number of part-time employees				
9	8	0	0	17

⁹ Table representing information on employees by contract type, broken down by gender. Reporting period 31 December 2025

AVERAGE NUMBER OF EMPLOYEES (HEADCOUNT)

Permanent employees			
Female	Male	Other	Not disclosed
82,8	131,1	0	0
Temporary Employees			
Female	Male	Other	Not disclosed
3,6	9,7	0	0
Non-guaranteed hours employees			
Female	Male	Other	Not disclosed
0	0	0	0

In the table above, the average number is based on CapMan's headcount employed at the end of the monthly reporting period and an average during the 12-month period is stated above.

THE TOTAL NUMBER OF EMPLOYEES AND BREAKDOWNS BY GENDER AND BY REGION (HEADCOUNT)¹⁰

Finland	Sweden	Other	Total
Number of employees			
157	34	47	238
Number of permanent employees			
148	32	41	221
Number of temporary employees			
9	2	6	17
Number of non-guaranteed hours employees			
0	0	0	0
Number of full-time employees			
149	32	40	221
Number of part-time employees			
8	2	7	17

¹⁰ Table representing information on employees by contract type, broken down by region. Reporting period 31 December 2025

S1-7 Characteristics of non-employee workers in the undertaking's own workforce

CapMan's workforce includes 10 non-employees, all of whom are self-employed individuals. There are no non-employees provided by undertakings primarily engaged in employment activities. The information for non-employees, such as consultants, is maintained in CapMan's master HR system.

Non-employees at CapMan are referred to as consultants and are categorised into two types: Service Consultants and Investment Consultants. Service Consultants perform interim, project, or service-related work for CapMan Plc, often related to ad-hoc tasks or new product or service launches that require additional resources or expertise. Their work is guided by an appointed CapMan employee or manager. Investment Consultants, on the other hand, act as advisors or network ambassadors in jurisdictions outside of CapMan's footprint. They provide support and advice with their extensive local knowledge and networks of investors, and their work is guided by the Managing Partner of an Investment Team or other relevant Partners.

The consultancy information is managed within CapMan's Legal and HR teams. The Legal team handles the contracts, which are entered into as business-to-business (B2B) agreements and are not deemed employment relationships. The HR team tracks the necessary information in the master HR system for control purposes. Consultancy agreements are typically made through third-party companies. Service Consultants perform work related to interim, project, or service needs, while Investment Consultants provide advisory services and support in specific areas or locations where their input

is needed. This structured approach ensures that CapMan effectively manages and utilises the expertise of non-employee workers within its workforce.

S1-9 Diversity metrics

CapMan Plc’s workforce is diverse across various age groups. The company has 51 employees under 30 years old, representing 21% of the total workforce. There are 148 employees between the ages of 30 and 50, making up 62% of the workforce. Additionally, there are 39 employees over 50 years old, accounting for 16% of the total workforce. This diverse age distribution reflects CapMan’s commitment to fostering an inclusive and varied work environment. CapMan Plc defines its top management as consisting of the CEO, CFO, COO, Head of Fund Investor Relations, Head of Sustainability, and Managing Partners of Investment Teams.

Employee gender representation in top management	Number of employees in top management	%
Female	4	33
Male	8	67
Non-Binary	0	0
Information Not Available	0	0
Total number of employees in top management	12	

S1-10 Adequate wages

CapMan ensures that all employees are paid an adequate wage, in line with applicable benchmarks.

S1-11 Social protection

CapMan ensures that all employees and non-employees in its workforce are covered by social protection through public programs or benefits offered by the company. This coverage includes protection against loss of income due to sickness, unemployment, employment injury, acquired disability, parental leave, and retirement. CapMan does not operate in countries where social protection through public programs or related benefits is not available. Therefore, all employees are guaranteed social protection in the countries where CapMan operates. This commitment to social protection underscores CapMan’s dedication to the well-being and security of its employees, ensuring they are supported in various circumstances that may affect their income.

S1-13 Training and skills development indicators

TRAINING AND SKILLS DEVELOPMENT METRICS

Training and skills development metrics by gender	Percentage of employees who participated in regular performance and career development reviews	Average number of training hours (employees)	Percentage of non-employees who participated in regular performance and career development reviews	Average number of training hours (non-employees)
Female	100 %	8	0 %	0,5
Male	100 %	8	0 %	0,5
Other	0 %	0	0 %	0
No Information available	0 %	0	0 %	0
Total	100 %	8	0 %	0,5

EMPLOYEE PARTICIPATION IN PERFORMANCE AND CAREER DEVELOPMENT REVIEWS BY CATEGORY

Employee category	Percentage of employees who participated in regular performance and career	Average number of employees who participated in regular performance and career development reviews	Average number of training hours per employee
Employees	100 %	239	8

The percentage of non-employees who participated in regular performance and career development reviews is 0%. Non-employees participate in performance and career development reviews provided by their employers, e.g. third-party vendors.

S1-15 Work-life balance indicators

CapMan ensures that 100% of its employees are entitled to take family-related leave. This entitlement is provided through social policies, ensuring that all employees have access to family-related leaves.

Percentage of entitled employees that took family-related leave, by gender	Percentage of employees entitled to take family leave that took family leave
Female	10 %
Male	8 %
Other	0 %
Not disclosed	0 %

S1-16 Remuneration metrics (pay gap and total remuneration)

CapMan is a small to medium-sized enterprise (SME) organisation, comprising 152 investment professionals and 86 service professionals. The majority of CapMan’s workforce is based in Finland (66%), with the remainder located in Sweden, Denmark, Norway, the UK, Germany and Luxembourg. Salaries differ between these locations, with Finland generally having lower average salaries compared to the rest.

Based on Eurostat’s gender pay gap analysis from 2023, CapMan’s pay gap aligns with the financial industry in the countries where it operates. CapMan maintains a transparent remuneration policy that highlights base salary, variable components, and benefits. Compensation is tied to seniority and roles, ensuring fairness and justice. The gender split within the organisation is roughly 40% women and 60% men, with the investment professional and partner groups being male-dominated, which affects the overall pay gap. Within the investment professional groups, variable pay (STI) is higher compared to service professionals, where women represent 64%.

The methodology used for calculating the pay gap includes employees in permanent positions, excluding the CEO and Partners (81% of the staff is used as sample) and considers the role-specific STI bonus maximum potential. The reasoning for using STI bonus maximal potential instead of actual payout is that each team has a specific bonus target linked to their financial performance, and actualised bonuses tend to fluctuate year over year. Remuneration in currencies other than Euro has been converted to Euro for comparison purposes. The ratio of highest-paid to median employee compensation is 5,2.

Country / Segment	Employment Category	Gender Pay Gap (%)
CapMan All	Permanent ¹¹	31,5
Finland	Permanent	32,1
Sweden	Permanent	20,0
Investment Professional	Permanent	17,6
Service Professional	Permanent	25,9

¹¹ Permanent employees in the above table refers to all permanent employees at CapMan excluding the CEO and Partners. The justification of excluding the CEO and Partners is due to their different status and compensation mix compared to regular employees.

S1-17 Incidents, complaints and severe human rights impacts

In 2025, CapMan reported no formal complaints filed through channels for people in its own workforce to raise concerns, nor were any complaints filed to National Contact Points for OECD Multinational Enterprises. There were no severe human rights issues or incidents connected to CapMan’s workforce, and no cases of non-respect of UN Guiding Principles and OECD Guidelines for Multinational Enterprises were identified. Consequently, there have been no severe human rights issues connected to CapMan’s workforce. Additionally, there were no fines, penalties, or compensation related to severe human rights issues and incidents connected to the workforce. Throughout 2025, no formal complaints or incidents were reported or actioned, and there were no incidents of discrimination or harassment.

Location	Number of Discrimination	Number of Discrimination	Total Incidents
All CapMan locations; Finland, Sweden, Denmark, Norway, Luxembourg and UK.	0	0	0

Governance information

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GOV-1 The role of the administrative, management and supervisory bodies

CapMan's governance model consists of the General Meeting of shareholders, the Board of Directors, and the CEO. In the operative management of the company, the CEO is supported by the management group. Under the Finnish Companies Act and CapMan's Articles of Association, the Board is responsible for the administration of the company and the proper organisation of its operations. The Board is also responsible for the appropriate arrangement of the controls of the company's accounts and finances. One of the Board's key tasks is to approve and monitor the progress of the strategic goals, including linking those to sustainability targets.

The CEO manages and supervises the company's business operations according to the Finnish Companies Act and in compliance with the instructions and authorizations issued by the Board. The CEO ensures that the accounts of the company are in compliance with the law and that its financial affairs have been arranged in a reliable manner. Generally, the CEO is independently responsible for the operational activities of the company and for day-to-day decisions on business activities and the implementation of these decisions.

The Board and the CEO are responsible for internal control and risk management, but internal control is conducted on all levels of the organisation, in all business and support functions. Each employee is individually responsible for the compliance of policies and instructions and for reporting faults and malpractice to their supervisor or other designated persons. The aim of CapMan's internal control and risk management is to ensure that the company's operations are efficient, appropriate, reliable, and in compliance with regulations, and that risks associated with the company's business and objectives are identified and appropriately monitored and managed. The group's internal control system is an essential part of the group's management system and consists of an organisation structure, policies, processes, working instructions, allocation of tasks and responsibilities, approval authorizations, manual and automated controls, monitoring reports, and reviews.

The expertise of the Board and the CEO on business conduct matters is described in CapMan's Corporate Governance Statement.

G1-1 Business conduct policies and corporate culture

CapMan's corporate culture is defined by how we work as an organisation. It encompasses how we recruit, retain, and reward our employees, as well as the systems and processes we have in place. This culture is further enhanced by our corporate brand identity, which was co-created through in-depth interviews with top management, key business stakeholders, and focus groups consisting of employees. CapMan conducts an annual employee survey to assess questions related to culture, measuring eNPS and Inclusion (uniqueness and belonging) internally on an annual basis. Post-survey discussions are conducted to solicit additional input, and plan further actions relevant to specific teams. Our performance management process, including target setting and employee discussions, acts as a follow-up to ensure our employees focus on the most relevant items, understand their role, responsibility, and accountability. Social events to increase connection across the organisation are arranged regularly, including a group-wide annual event, featuring inspiring workshops, lectures, and awards ceremonies.

Policies related to business conduct are outlined in our Code of Conduct and our Anti-Bribery and Corruption policy. Mechanisms for identifying, reporting, and investigating concerns about unlawful behaviour or behaviour in contradiction of our code of conduct or similar internal rules accommodate reporting from both internal and external stakeholders. These mechanisms include the Code of Conduct, other internal policies and controls, incident reporting, and the whistleblowing channel. Notifications can be made anonymously, and retaliation measures are forbidden, as described in the whistleblowing policy. CapMan is committed to investigating business conduct incidents promptly, independently, and objectively. We have plans to implement policies on anti-corruption or anti-bribery consistent with the United Nations Convention against Corruption, although a timetable for implementation has not been supplied. We have a whistleblowing policy and channel in place, therefore implementation of policies on protection of whistle-blowers are already in place. We comply with regulatory protection of whistle-blowers, and our policy contains a description of protection and how reports are handled.

Annual code of conduct training is mandatory for all employees, with additional training for new employees upon joining CapMan. However, functions most at risk in respect of corruption and bribery have not been identified. CapMan is subject to legal requirements regarding the protection of whistleblowers. In addition to Code of Conduct and supplier Code of Conduct, we do have anti-corruption and anti-bribery policies, as well as a whistleblower policy in place. Policies with respect to animal welfare are not in place.

G1-2 Management of relationships with suppliers

CapMan's approach to managing relationships with suppliers is outlined in its Supplier Code of Conduct. This code describes the company's approach to supplier relationships, taking into account risks related to the supply chain and impacts on sustainability matters. CapMan expects its suppliers to be aware of the environmental impact and environmental risks of their activities and to minimise the adverse effects of their activities.

The Supplier Code of Conduct is added to all supplier agreements with an annual value exceeding 15,000 euros. CapMan expects its suppliers to fully embrace the basic principles and ethical standards of business behaviour set forth in this Supplier Code throughout their own operations and supply chains. If a supplier is unable to accept CapMan's Supplier Code, CapMan cannot continue the business relationship with that supplier.

CapMan has implemented various electronic purchase invoice processing systems across most of its group companies to prevent late payments, especially to SMEs. These systems send automatic reminders for any unprocessed invoices, ensuring timely processing. All invoice processors are required to set a substitute during their absence, and local accountants along with CapMan Group Finance & Accounting regularly monitor overdue and unpaid invoices. They remind individuals or assign substitutes to invoice processors on a case-by-case basis when necessary. This procedure applies to all purchase invoices, and there is no separate policy specifically addressed to invoices issued by SMEs.

G1-3 Prevention and detection of corruption and bribery

CapMan's Code of Conduct establishes the basic principles governing our decision-making and actions, as well as the responsibilities of CapMan employees in the business environment. This Code serves as a guiding tool, ensuring that we operate not only in compliance with laws and regulations but also based on what we believe is ethically right. More specific principles and practical guidelines are presented in various corporate policies and procedures, and employees are trained regularly to uphold these standards.

To prevent, detect, and address allegations or incidents of corruption or bribery, CapMan has implemented an Anti-Bribery and Corruption (ABC) policy and provides ABC training to employees. The investigators or investigating committee responsible for handling these matters are separate from the chain of management involved in the prevention and detection of corruption or bribery, ensuring independence and objectivity. The compliance function is responsible for ABC matters, as well as the investigation and reporting processes, which are conducted on a case-by-case basis.

The ABC policy is accessible to all CapMan personnel on the Intranet, and regular online ABC training, including a questionnaire, must be completed every two years. This training is also mandatory for all new employees. The nature, scope, and depth of the anti-corruption or anti-bribery training programs are outlined in the internal ABC policy. The same training is provided to all personnel, including members of the Board and the CEO.

CapMan is committed to continuously improving its training activities, and it has a tool equipped to monitor the conducted trainings. This enhances the analysis of training activities by region or category. There have been no convictions for violations of anti-corruption and anti-bribery laws, reflecting the effectiveness of the measures in place.

G1-4 Incidents of corruption or bribery

CapMan has taken actions to address breaches in procedures and standards related to anti-corruption and anti-bribery. There have only been minor breaches against internal procedures, which have been addressed through incident reporting, corrections to processes, and additional ABC trainings. There have been no confirmed incidents of corruption or bribery. Consequently, there have been no instances where CapMan's own workers were dismissed or disciplined for corruption or bribery-related incidents. Similarly, there have been no confirmed incidents relating to contracts with business partners that were terminated or not renewed due to violations related to corruption or bribery. There have been no public legal cases regarding corruption or bribery brought against CapMan or its workers, and thus no outcomes to report. There have been no incidents of corruption reported, and no fines have been imposed for violations of anti-corruption and anti-bribery laws.

G1-5 Political influence and lobbying activities

The CapMan Plc Board of Directors is responsible for overseeing political influence and lobbying activities within the organisation. According to CapMan's Anti-Bribery and Corruption (ABC) policy, the company does not make political contributions to political parties, party officials, or candidates unless such contributions are approved in advance by the CapMan Plc Board of Directors. This policy ensures that any financial or in-kind political contributions are made transparently and with proper oversight. Additionally, charitable donations must not be made to improperly influence the recipient or in exchange for any business or other commercial advantage. Charitable donations and sponsoring cannot be used to circumvent the prohibition on corruption or bribes.

CapMan engages with policy-makers on relevant general interest topics as an active and responsible member of society. The company transparently discloses any lobbying activities and is a member of relevant industry organisations. Through these memberships, CapMan may lobby on topics that are important to the private equity industry as a whole. However, CapMan is not registered in the EU Transparency Register or any equivalent transparency register in a Member State.

There have been no reported cases of members of CapMan's Board and the CEO holding comparable positions in public administration in the two years preceding their appointment. One member of CapMan's Board is holding comparable position in public administration (United Kingdom's Financial Reporting Council). There have been no other reported cases of members of CapMan's Board and the CEO holding comparable positions in public administration. The amount paid for membership to lobbying associations from January to December 2025 was 158,945 EUR. CapMan is not legally obliged to be a member of a chamber of commerce or any other organisation that represents its interests.

CapMan

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