

SFDR Statement

CapMan AIFM Oy (“CapMan AIFM”), CapMan alternative investment fund manager, makes the following disclosures in accordance with Articles 3(1), 4(1)(a) and 5(1) of the Sustainable Finance Disclosure Regulation (2019/2088) (the “SFDR”).

This statement is dated on 23 December 2022 and it combines together the information previously included in CapMan’s Sustainability policy and CapMan’s websites under the section Considerations of adverse sustainability impacts.

Transparency of sustainability risk policies

CapMan AIFM integrates sustainability risks in its decision-making process, as referred to under Article 3 of the SFDR. Sustainability risk means an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment. Environmental risks can relate to, among others, to climate-related risks (physical and transitional), biodiversity or pollution. Social risks can relate to for instance safety and well-being, human rights in the supply chain, and employee or tenant satisfaction or others. Governance risks can relate to for example inadequate management of ESG, management incentives, corruption, bribery, cybersecurity, or data privacy. The potential sustainability risks to which any investment is exposed may cause a negative impact on the value of investments.

Before any investment decisions are made, and as part of its overall investment analysis, CapMan will identify the material sustainability risks associated with the proposed investment. Investment decisions will then be made by referencing the relevant investment policies and objectives, including an action plan for mitigating any sustainability risks at asset level.

Description of and policies to identify and prioritise sustainability risks are included in CapMan’s [Sustainable Investment Policy](#). CapMan further restricts investments in certain sectors and activities as detailed in its [Restriction list](#).

Transparency of adverse sustainability impacts on entity level

CapMan AIFM considers principal adverse impacts on sustainability impacts of its investment decisions as described by Article 4 of the SFDR.

Sustainability factors may impact the revenue and cost structure of target investments directly, or have external impacts, such as impacting the quality of life for community stakeholders or perceived value for customers. Accordingly, they also impact return on investment. CapMan strives to integrate sustainability factors with its general core business, creating a strong culture that drives sustainable practices both at CapMan and in its portfolio companies and real estate.

These principal adverse impacts are identified and prioritised through CapMan’s due diligence processes, which are detailed in CapMan’s Sustainable Investment Policy.

CapMan AIFM reviews the principal adverse impacts annually and discloses the information in its [Principal Adverse Impacts Statement](#).

Transparency of remuneration policies in relation to the integration of sustainability risks

CapMan AIFM considers the integration of sustainability risks when determining remuneration, as described by Article 5 of the SFDR.

Sustainability risks are considered in the remuneration of key personnel that make investment decisions or provide investment advice. CapMan AIFM can withhold and in certain cases force repayment of short-term performance-based compensation in case of a material violation of relevant CapMan policies (including Code of Conduct and policies related to sustainability and ESG) has occurred or a material sustainability risk has realised.

Scope

This statement covers the funds managed by CapMan AIFM which have been established or open for new investments after the SFDR came into force on 10 March 2021. CapMan AIFM funds covered in this statement are listed below together with their classification made under the SFDR.

Fund	Article	Targeted investor group	Art 8 Product disclosures (as requested in Art 10)
Erikoissijoitusrahasto CapMan Nordic Property Income Fund	8	Professional and non-professional investors	CMNPI Regulatory Disclosures document
CapMan Residential FCP-RAIF	8	Professional investors	Included in the fund documentation provided only to the investors and potential investors
CapMan Hotels II FCP-RAIF	8	Professional investors	Included in the fund documentation provided only to the investors and potential investors
CapMan Nordic Infrastructure II SCSp	8	Professional investors	Included in the fund documentation provided only to the investors and potential investors
CapMan Special Situations Ky	6	Professional investors	-
Nest Capital III Ky	6	Professional investors	-
Erikoissijoitusrahasto CWS Investment Partners Fund	6	Professional investors	-
Erikoissijoitusrahasto CWS Investment Partners Fund II	6	Professional investors	-

Erikoissijoitusrahasto CWS Investment Partners Fund III	6	Professional investors	-
Erikoissijoitusrahasto CW Investment Partners Fund IV	8	Professional investors	Included in the fund documentation provided only to the investors and potential investors
Erikoissijoitusrahasto CapMan Tre Smeder	6	Professional investors	-
CapMan Growth Equity Fund III Ky	8	Professional investors	Included in the fund documentation provided only to the investors and potential investors
CapMan Dasos Sustainable Wood and Forest III	8	Professional and non-professional investors	Fund documentation for non-professional investors is available free of charge in English and Finnish from the distributor Nordea Bank via Nordea Customer Service or in Netbank at http://www.nordea.com
CapMan Dasos European Forest Fund IV	9	Professional investors	Included in the fund documentation provided only to the investors and potential investors