

CapMan Nordic Property Income Fund (non-UCITS) – Regulatory Disclosures/13.4.2021

The following table sets forth information required to be disclosed to investors pursuant to article 23 of the EU Directive 2011/61 on Alternative Investment Fund Managers and the Finnish decree of the Ministry of Finance 226/2014

DESCRIPTION	INFORMATION / EXPLANATION	MORE INFORMATION CAN BE FOUND IN SECTION(S) OF THE FUND RULES AND THE FUND'S KEY INVESTOR INFORMATION DOCUMENT ("KIID")
<p>1. Description of the investment strategy and objectives of the Alternative Investment Fund ("AIF").</p>	<p>CapMan Nordic Property Income Fund (non-UCITS) ("Fund") is an alternative investment fund and a special investment fund within the meaning of the Finnish Act on Alternative Investment Fund Managers (162/2014) (hereinafter the "AIFM Act") investing primarily in real estate and real estate securities. The operations of the Fund are also covered by the provisions of the Finnish Real Estate Funds Act (1173/1997, the "Real Estate Funds Act") regarding the investments, valuation and borrowings (where applicable). The AIFM Act refers to the Finnish Act on Common Funds (213/2019) (hereinafter the "Common Funds Act") in certain matters which means that some rules and restrictions of the Common Funds Act are applicable to the Fund.</p> <p>The objective of the investment operations of the Fund is to generate long-term risk-adjusted returns to the Fund's unit holders by investing the assets of the Fund in accordance with the Fund Rules and applicable legislation. The assets of the Fund are invested primarily, directly or indirectly, into real-estate investment targets located in Finland, Sweden, Denmark, and Norway ("Target Countries").</p> <p>The Fund aims to generate income primarily from the rental income of the properties owned by it, the appreciation of property values, and realised gains.</p>	<p>Sections 1 and 4 of the Fund Rules and under section "Objectives and Investment Policy" of the KIID</p>
<p>2. Information on where any master AIF is established and where the underlying funds are established if the AIF is a fund of funds.</p>	<p>Not applicable, the Fund is not a fund of funds.</p>	<p>N/A</p>
<p>3. A description of the types of assets in which the AIF may invest.</p>	<p>The assets of the Fund are mainly invested in real estate, real estate securities and other securities related to real estate investment operations located in the Target Countries. Additionally, the Fund's assets may be invested in ETF:s, REIT:s, Fixed-income instruments, deposits and bonds issued or guaranteed by European countries, public entities or other entities, UCITS or AIFs that primarily invest in real estate, construction or real estate development projects. The Fund may use derivatives for hedging purposes.</p>	<p>Section 6 of the Fund Rules and KIID under section "Objectives and Investment Policy"</p>

4. A description of the techniques it may employ and mitigate all associated risks.

The Alternative Investment Fund Manager (“AIF Manager”) has adopted internal risk management policies and procedures in order to adhere with the applicable regulation. The AIF Manager complies with its risk management policy that states how the identification, assessment, monitoring, risk reporting and management of risks is to be structured in the operations of the AIF Manager.

The AIF Manager also has in place processes for managing the risks associated to the Fund’s investments. All investments carry risk. An investor looking to make an investment in the Fund, should observe that various risk factors may affect the value and return of fund units.

Some of the risks that specifically concern this Fund are the following:

Risk associated with the Fund’s investments: The risk of a significant decline in the value of an investment. An investment is also exposed to risks associated to its utilization, lower rental income than what was expected or the fees, associated with property maintenance, or investments in relation to property maintenance, are higher than expected, which lowers the profitability of the fund operations.

Rental risk: A risk stemming from significant variation in the rental income of the property objects during the Fund’s operations. It is possible that the rental income is lower than expected or that the rental income decreases, which lowers the profitability of the Fund’s operations.

Liquidity risk: Risk associated with realization of an illiquid investment, particularly in difficult market conditions, which may lead to losses and delay the execution of redemptions.

Industry risk: The risk of a significant decline in the property market.

Financing risk: The risk of the availability of the Fund’s debt financing decreasing or the fees of such increasing.

Operational risk: The risk of errors or deficiency associated with the internal proceedings, personnel and systems of the Manager. Legal and contractual risks are also included in the category of operational risks.

Exchange rate risk: The risk of changes in currency exchange rates affecting investments outside the Eurozone.

Pricing-method-related risk

The Fund uses a pricing method based on the INREV NAV guidelines in its value calculation. From the perspective of the fund unit holder, the most significant risks are related to the interpretation (of the supervisory authority) regarding the suitability of the pricing method for value calculation at the time in question.

The risks related to adjustments utilized by the pricing method:

- a) Time based risk related to amortisation and adjustments. The pricing method adjusts and amortises the expenses arising from transactions, among other things. If the Fund liquidates or sells its assets during the amortisation, the realised return is primarily lower by the unamortised amount.

The most relevant risks associated with the Fund are found under the “Risk and Reward Profile” in the KIID

	<p>b) Market practice risk regarding the adjustment of deferred tax liability in a transaction situation. The deferred tax liability of share-based real estate sales in Norway, Sweden and Denmark is adjusted for the benefit of the seller in the calculation of the share price. The adjustment is based on the current market practice (e.g. 50/50). After the acquisition of the shares, a corresponding adjustment is made for the benefit of the Fund, based on the valid market practice at the time of reporting. The pricing method pursues the most likely realised profit at the time of reporting. The risks related to the pricing method are related to the variance of the market policy regarding the deferred tax liability. Depending on the general liquidity and the market situation, the amount of adjustment in connection to sales can change and this may impact NAV of the Fund by increasing or lowering it.</p> <p>Interest rate risk The amount of interest related to the debt financing of the Fund has a significant impact on the amount of realised returns. Long periods of low interest rates may also attract investors demanding steady distributable returns to invest in cash-flow-generating real assets products. Rising interest rates may have an indirect lowering impact on the value of real estate when expectations of realised cash flow returns are lowered.</p> <p>Investors shall observe that the above presented list of risks associated with the Fund is not conclusive. An investment in the Fund is also subject to other risks, such as market risk, geographical risk, counterparty risk, tax risk, derivatives risk and Force-Majeure risk.</p>	
<p>5. A description of any applicable investment restrictions.</p>	<p>The Fund's investment strategy is in compliance with the requirements of the AIFM Act and the Real Estate Funds Act i.e., generally speaking and subject to the detailed provisions of each of the above-mentioned Acts.</p> <p>According to the most relevant investment restriction, at a minimum 60 per cent of the total assets of the Fund (GAV) must be invested directly or indirectly in real estate or real estate securities in the Target Countries.</p> <p>The other investment restrictions of the Fund are described in detail in the Fund Rules.</p>	<p>Section 6 of the Fund Rules</p>
<p>6. A description of the circumstances in which the AIF may use leverage, the types and sources of leverage permitted and the associated risks, any restrictions on the use of leverage and any collateral and asset reuse arrangements, and the maximum level of leverage which the manager of the AIF are entitled to employ on behalf of the AIF.</p>	<p>The AIF Manager may borrow for the account of the Fund an amount corresponding to a maximum of one half (1/2) of the total assets of the Fund (GAV). In addition to that, the AIF Manager may, for special reasons defined in the Fund Rules, borrow for the account of the Fund an amount corresponding to a maximum of one third (1/3) of the total assets of the Fund (GAV).</p> <p>For the sake of clarity, the AIF Manager may borrow for the account of the Fund an aggregate amount not exceeding a maximum of five sixths (5/6) of the total assets of the Fund (GAV).</p>	<p>Section 6 of the Fund Rules</p>

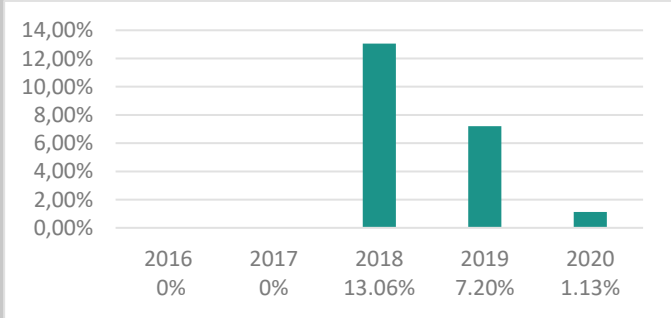
	(Direct) borrowings for the account of the Fund and (indirect) borrowings related to the investment of the Fund (such as the liabilities regarding real estate securities owned by the Fund) must be considered as a whole when monitoring the compliance with the Fund's restrictions regarding the borrowings.	
7. A description of the procedures by which the AIF may change its investment strategy or investment policy, or both.	<p>Amendments and deviations from the investment strategy or policy and the following changes in the Fund Rules, require a decision from the board of the AIF Manager.</p> <p>The Fund may temporarily deviate from the investment restrictions during the establishment of the Fund, in connection with the subscription or redemption of fund units, when selling or acquiring investment objectives, and when the assets of the Fund cannot be invested in a profitable manner according to the investment policy of the Fund.</p>	Section 6 and 18 of the Fund Rules
8. A description of the main legal implications of the contractual relationship entered into for the purpose of investment, including information on jurisdiction, on the applicable law and on the existence or not of any legal instruments providing for the recognition and enforcement of judgments in the territory where the AIF is established.	<p>Governing law and disputes The operations of the Fund and the AIF Manager are governed by Finnish law. Any disputes concerning the Fund are resolved in arbitration.</p> <p>Tax implications The Fund is a special investment fund registered in Finland, which is an entity exempt from income and property taxes.</p> <p>Where the fund unit holder is subject to general tax liability in Finland, the profit share paid for fund units and the capital gains realised with the redemption of fund units constitute taxable income to the recipient, which is taxed according to the valid capital tax rate at each time. The AIF Manager will perform the withholding from the profit share paid to the fund unit holders and report the fund units owned by a taxable person to the Finnish Tax Administration. The fund unit holders must report the paid profit shares and capital gains to the applicable tax authority personally.</p> <p>The subscription and redemption fees collected during fund entry and exit are taken into consideration when calculating the capital gains and losses. The capital loss can be deducted in capital income taxation in the manner specified by the Tax Administration at each time. The income received by an entity is taxable income to the recipient. The calculation of the income received by an entity is performed income-source-specifically and the source into which the income received from the Fund belongs depends on the tax position of the recipient.</p>	Sections 15 and 22 of the Fund Rules
9. Information on the identity of the AIFM, the AIF's depositary, auditor and any other service providers and a description of their duties and the investors' rights.	<p>AIF Manager: CapMan AIFM Oy The Fund is managed by the AIF Manager, CapMan AIFM Oy. The business purpose of the AIF Manager under its articles of association is the management of alternative investment funds. The AIF manager is responsible for the portfolio management and risk management of the Fund.</p>	Sections 1 and 3 of the Fund Rules and KIID under section "Practical Information"

	<p>Depository: Danske Bank A/S, Finland Branch In accordance with the AIFM Act, the AIF Manager has appointed Danske Bank A/S, Finland Branch as a depository for the Fund pursuant to the terms of the Depository Agreement. The Depository is responsible for its operations as stipulated in the AIFM Act. Accordingly, the Depository is responsible for the proper conservation of the assets of the Fund, monitoring the cash flow, and ensuring that the money belonging to the Fund or the AIF Manager is recorded correctly. The assets of the Fund are kept separate of the assets of the other funds, AIF Manager and the Depository.</p> <p>Auditor: Ernst & Young Oy The auditing of the AIF Manager and the Fund is performed by audit firm Ernst & Young Oy.</p> <p>Internal Audit: KPMG Oy Ab The internal audit is outsourced to KPMG Oy Ab, which shall execute at least one internal audit on the functions of the AIF Manager annually.</p> <p>Appraisal of real estate assets: Jones Lang LaSalle Finland Oy For the appraisals of its real estate assets, the Fund uses only real estate appraisers who have been authorized by the Central Chamber of Commerce in Finland (KHK valuators). At the moment, the appraisals of the Fund's real estate assets are performed by Jones Lang LaSalle Finland Oy. The appraisals are confirmed internally by the AIF Manager's valuation controller.</p>	
<p>10. A description of how the AIF Manager is complying with the requirements of Chapter 6 of Section 4 of the Act on AIFM.</p>	<p>The AIF Manager of the Fund has sufficient additional own funds as required by Chapter 6, Section 4 of the AIFM Act. The sufficiency of the additional own funds is monitored ongoingly.</p>	
<p>11. A description of any delegated management function by the AIF Manager and of any safekeeping function delegated by the depository, the identification of the delegate and any conflicts of interest that may arise from such delegations.</p>	<p>The AIF Manager has delegated following functions/services within its group to either its parent company CapMan Plc or JAM Advisors Ltd:</p> <ul style="list-style-type: none"> • Back-office services (including investor and FIN-FSA reporting and KYC procedure); • Legal and compliance services (including contract management, regulatory and fund compliance); • IT administration services (including IT systems and data protection); • Finance and accounting • HR services (including general HR matters) • Value calculation • Maintenance of the fund unit register <p>During its operations, the Depository may use one or more sub-custodians, whose reliability and conformity to regulation are the responsibility of the depository. The Depository has not transferred other custodial tasks or responsibilities to third parties. If the depository were to transfer these functions to a reliable third party, the transfer of custodial functions would not affect the responsibilities of the Depository, unless it was relieved of its responsibility according to regulation. The Depository may use entities specializing in safe custody services</p>	<p>Sections 2 and 3 of the Fund Rules</p>

	<p>supervised by the Finnish Financial Supervisory Authority or a corresponding foreign authority.</p> <p>The AIF Manager has adopted an internal policy regarding the management of Conflicts of Interest. The internal policy identifies typical situations of conflicts of interest, which might arise in the business operations of the AIF Manager and also describes procedures, which shall be complied with in order to avoid the arising of such conflicts of interest and manage already actualized conflicts in a way that ensures fair and equal treatment of investors.</p>	
<p>12. A description of the AIF's valuation procedure and of the pricing methodology for valuing assets.</p>	<p>The value of the Fund is calculated a minimum of 4 times per year. The value calculation date of the Fund is the last day of each quarter ("Value Calculation Date") or another last day of the month decided by the board of the AIF Manager. If the last day of the month in question is not a business day, the Value Calculation Date is the preceding business day.</p> <p>The value of the Fund is calculated and published based on the information of the Value Calculation Date. The value of the Fund is calculated on the basis of the net value of the assets of the Fund (NAV) by deducting the liabilities of the Fund from the total assets of the Fund (GAV). The value of the Fund is presented in euros.</p> <p>The valuation of fund units is described in Section 11 of the Fund Rules.</p> <p>The market value of real estate and real estate securities that are not traded on a regulated market or in a multilateral trading facility is evaluated (at least) quarterly by a real estate appraiser authorized by the Central Chamber of Commerce in Finland according to the accepted principles of real estate appraisal. The value of the real estate and real estate securities mentioned above is also valued when they are bought or sold and when a fund subscription is paid for with such asset in kind or when investment objects of the Fund are transferred as compensation for redemption.</p> <p>Regarding securities related to real estate investment operations in the Target Countries that are traded on a regulated market or in a multilateral trading facility (including units of investment funds, UCITS, and alternative investment funds as well as standardised derivative contracts), the valuation is based on the latest official closing price available at 8 a.m. EET on the business day following their value date which date is the Value Calculation Date or the day preceding the Value Calculation Date.</p> <p>A more thorough description regarding the valuation procedure of all types of assets can be found in Section 12 of the Fund rules.</p>	<p>Section 11 of the Fund Rules</p> <p>Information regarding the value of the fund units is available on the website of the AIF Manager at www.capman.com/real-estate and on the premises of CapMan.</p>
<p>13. A description of the AIF's liquidity risk management.</p>	<p>The AIF Manager may borrow for the account of the Fund in order to ensure the liquidity of the Fund. For more information on the requirements with regard to borrowing please see Section 6 of this Regulatory Disclosures and Section 6 in the Fund Rules.</p> <p>Other methods that the AIF Manager may apply for the AIF's liquidity risk management are:</p>	<p>Sections 6, 9 and 19 of the Fund Rules</p>

	<ul style="list-style-type: none"> - the staggered redemption fees (displayed in Appendix 1 of this Regulatory Disclosures -document); - temporarily suspending redemptions (Section 19 of the Fund Rules); - postponing the execution of redemption orders (Section 9 of the Fund Rules); and - paying the redemptions in instalments (Section 9 of the Fund Rules). <p>Investors shall observe that fund units can only be redeemed twice per year.</p>	
<p>14. A description of the redemption rights both in normal and in exceptional circumstances, and the existing redemption arrangements with investors.</p>	<p>Fund units are redeemed by issuing a redemption order to the AIF Manager.</p> <p>The fund units can be redeemed twice per year on the last business day of March and September of each calendar year (“Redemption Date”).</p> <p>The redemption order must be delivered (and the possible share certificate handed over) to the AIF Manager or the operator performing the outsourced functions of the AIF Manager. The redemption order must be delivered on the Redemption Date preceding the desired Redemption Date at the latest (“Redemption Order Due Date”).</p> <p>The redemption orders are performed in the order they are received, and a redemption order may only be cancelled on the authorization of the AIF Manager. As a confirmation for the redemption, the investor will receive a redemption calculation.</p> <p>If the Fund has sufficient cash assets on the Redemption Date to perform the redemption, the fund units are redeemed at the value of the Redemption Date and the redemption price (with the possible redemption fee deducted) is paid to the bank account provided by the fund unit holder immediately after the value of the fund unit for the Redemption Date in question has been calculated.</p> <p>If the funds required to execute the redemption must be acquired by selling assets of the Fund, the fund units are redeemed at the value of the nearest Value Calculation (defined in the fund rules Section 11) following the moment of sale, however at the value of the next Redemption Date at the latest. In this case, the redemption price, from which the potential redemption fee has been deducted, is paid to the bank account specified by the fund unit holder immediately after the value of the fund unit on the next nearest Value Calculation Date following the sale of assets has been calculated in the manner specified above. Regardless of the above, the AIF Manager and the fund unit holder may make other arrangements regarding the payment of the redemption.</p> <p>The board of the AIF Manager and the unit holder may agree that the fund units can alternatively be redeemed by transferring an amount of the Fund’s assets corresponding to the redemption price (“redemption with asset in kind”) to the fund unit holder. When concluding the redemption agreement, the AIF Manager must ensure that said measure does not jeopardise the interests of other unit holders. At the same time, the board of the AIF Manager will decide on the manner of payment of the redemption fee related to the redemption paid with an asset in kind.</p>	<p>Sections 9 and 19 of the Fund Rules</p>

	<p>The AIF Manager may temporarily suspend the redemptions of fund units if, in the opinion of the AIF Manager, it is required for reasons of equality or benefit of the unit holders or another particularly important reason. Suspension is possible in the situations described in Section 19 of the Fund Rules. In case the amount of redemptions in any Redemption Date is going to exceed five (5) percent of the assets of the Fund, the AIF Manager may decide to restrict the redemptions submitted in accordance the section 9 in the Fund rules. The redemption orders will lapse, if not executed.</p>	
<p>15. A description of all fees, charges and expenses and of the maximum amounts thereof which are directly or indirectly borne by investors.</p>	<p>Please see Appendix 1 to this Regulatory Disclosures. The expenses of the Fund are also explained in the Fund Rules.</p>	<p>Section 12 of the Fund Rules</p>
<p>16. A description of how the AIFM ensures a fair treatment of investors and, whenever an investor obtains preferential treatment or the right to obtain preferential treatment, a description of that preferential treatment, the type of investors who obtain such preferential treatment and, where relevant, their legal or economic links with the AIF or AIF Manager.</p>	<p>Under applicable legislation concerning the Fund and the AIF Manager, the AIF Manager must treat fund unit holders equally. The Fund Rules enable the board of the AIF Manager to decide on differing fees for the fund unit series. The board of the AIF Manager has confirmed the subscription conditions for the fund unit classes issued at each time, which are published in the pricelist included as Appendix 1 of this Regulatory Disclosures-document.</p> <p>The AIF Manager may when determining subscription requirements take into account, for instance, the overall customer relationship of the subscriber with the AIF Manager's group, if the subscriber is an employee at the AIF Manager's group, the longevity of the investment and subscription amount.</p>	<p>Section 7 of the Fund Rules</p>
<p>17. The latest annual report as referred to in Section 1 of Chapter 11 of the Act on AIFM.</p>	<p>The latest annual report of the Fund is displayed on the web page of the AIF Manager: https://www.capman.com/fi/kiinteistosijoitukset/nordic-property-income/</p>	<p>https://www.capman.com/fi/kiinteistosijoitukset/nordic-property-income/</p>
<p>18. Information on the procedure and conditions for the issue and sale of fund shares.</p>	<p>Fund units can be subscribed for by delivering a subscription form to the AIF Manager or a distributor of the AIF Manager by email or mail, using the subscription form of the Fund. The subscription order shall be delivered to the AIF Manager and the subscription price shall be paid to the subscription account, on the Subscription Date (or the Extraordinary Subscription Date) at 3 p.m. EET at the latest. The subscriber must specify in the subscription order the unit class of which they are subscribing for. The subscription order is binding upon the subscriber.</p> <p>Fund units are available for subscription a minimum of four times per year. The regular subscription dates ("Subscription Date") are the last business days of March, June, September, and December. Regardless of the above, the board of the AIF Manager may decide that fund units can also be subscribed for on other than the above-mentioned dates ("Extraordinary Subscription Date").</p>	<p>Section 8 of the Fund Rules</p>

	<p>For information on subscriptions with assets in kind, please see Section 8 in the Fund Rules.</p> <p>The AIF Manager is entitled to reject a subscription order or postpone the execution of a subscription order in accordance with what is stated in sections 9 and 19 in the Fund Rules.</p>													
19. The latest net asset value of the AIF or the latest market price of the unit or share of the AIF.	<p>The latest net asset value for each fund unit series is published and updated on the web page of the AIF Manager:</p> <p>http://www.capman.com/investment-strategies/real-estate/capman-nordic-property-income-fund/</p>	http://www.capman.com/investment-strategies/real-estate/capman-nordic-property-income-fund/												
20. Where available, information on the historical performance of the AIF.	<p>The historical performance displayed below is for the E series of the Fund.</p> <p>In its calculation all of the Fund's fees have been taken into account except for any subscription fees. Any possible taxes have been excluded from the calculation.</p> <p>Historical performance is no guarantee for future returns.</p>  <table border="1"> <thead> <tr> <th>Year</th> <th>Return (%)</th> </tr> </thead> <tbody> <tr> <td>2016</td> <td>0%</td> </tr> <tr> <td>2017</td> <td>0%</td> </tr> <tr> <td>2018</td> <td>13.06%</td> </tr> <tr> <td>2019</td> <td>7.20%</td> </tr> <tr> <td>2020</td> <td>1.13%</td> </tr> </tbody> </table>	Year	Return (%)	2016	0%	2017	0%	2018	13.06%	2019	7.20%	2020	1.13%	<p>KIID for each unit series under section: "Past Performance".</p>
Year	Return (%)													
2016	0%													
2017	0%													
2018	13.06%													
2019	7.20%													
2020	1.13%													
21. Information on the identity of the prime broker and a description of any material arrangements of the AIF with its prime brokers and the way the conflicts of interest in relation thereto are managed.	<p>Not applicable as the Fund does not have a prime broker.</p>	N/A												
22. Information of the provision in the contract with the depositary on the possibility of transfer and reuse of AIF assets, and information about any	<p>The Fund does not have a prime broker.</p> <p>The Depositary Agreement between the AIF Manager and the Depositary as well as the obligations of the Depositary are compliant with Sections 14-16 of the AIFM Act.</p>													

<p>transfer of liability to the prime broker that may exist.</p>	<p>By entering the Agreement with the Depositary, the AIF Manager has authorized the Depositary to transfer or cause to be transferred at its own discretion at any time any cash and custodial assets from, between or among the accounts, if in the Depositary's judgement such transfer may be required to fulfil its obligations under the Agreement between the AIF Manager and Depositary, the Fund Rules or other relevant regulation or obligation determined by the Depositary at its own discretion. If a transfer is in a currency different from the currency of the cash and custodial assets held on any account, the Depositary is authorized to, at any time, exchange amounts at the market rate with the usual client margins.</p> <p>The Depositary shall also check that there are procedures in place so that registered assets cannot be assigned, transferred, exchanged or delivered without the Depositary or its delegate having been informed of such transactions and the Depositary shall have access without undue delay to documentary evidence of each Transaction and position from the relevant third party.</p> <p>The Depositary and the AIF Manager are on an individual basis obliged to set up and during the lifetime of the Depositary Agreement continue to have procedures in place to ensure that the Assets cannot be assigned, transferred exchanged or delivered without the depositary being immediately informed of such Transaction.</p>	
<p>23. A description of how and when the information required in the Sections 5 and 6 of the Paragraph 12 of the Act on AIFM are disclosed.</p>	<p>The investors will be provided with the information referred to in Sections 5 and 6 of Paragraph 12 of the AIFM Act in this Regulatory Disclosures document, the KIID and the Fund Rules, which are updated regularly, but at least once per year. The abovementioned information documents can be obtained on the web page of the AIF Manager.</p>	<p>The Fund's Regulatory Disclosures, KIID and Fund Rules Sections 8 and 9</p>
<p>24. Disclosures in accordance with the Regulation (EU) 2019/2088 of the European Parliament and of the Council of November 27, 2019, on sustainability-related disclosure requirements in the financial services sector ("Disclosure Regulation")</p>	<p>Integration of Sustainability Risks</p> <p>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 ("Sustainability Risk").</p> <p>The AIF Manager seeks to identify and mitigate Sustainability Risks through screening, due diligence, risk management, stakeholder engagement and active value creation of the investment.</p> <p>Sustainability Risks are integrated in the investment decision-making process as follows:</p> <ul style="list-style-type: none"> • Potential sustainability risks are identified and their likelihood of occurrence and, if realised, their severity is evaluated. • A course of action is identified for eradicating or mitigating the sustainability risk or, if the risk is deemed too severe, a decision is made to not proceed with the investment. • Sustainability Risks associated with an investment are presented to the board of the AIF Manager, which makes the investment decision. 	<p>Further information can be found at CapMan's Sustainable Investment Policy (https://www.capman.com/company/sustainability/).</p>

Sustainability Risks 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.

Classification

The Fund is not classified as a product promoting environmental or social characteristics within the meaning of the Disclosure Regulation (Article 8), nor as a product with sustainable investment as its objective (Article 9).

Transparency of adverse sustainability impacts

Explanations of any adverse sustainability impacts pursuant to Article 7 (1) of the Disclosure Regulation will be included in this Memorandum and in the annual reports of the Fund as of December 30, 2022.

Appendix 1: Pricelist

Fund-unit-series-specific fees confirmed by the board of the AIF Manager.

Fund unit series	Nordea series	A series	B series	C series	D series	E series
ISIN	FI4000399845	FI4000281910	FI4000281928	FI4000281936	FI4000281944	FI4000281951
Minimum subscription*	€5,000	€50,000	€500,000	€1,500,000	€5,000,000	€10,000,000
Subscription fee	0-2 %***	2 %	1 %	1 %	0 %	0 %
Redemption fee						
< 1y	2 %	3 %	3 %	3 %	4 %	5 %
1–3y	2 %	2 %	2 %	2 %	3 %	4 %
3–5y	2 %	1.5 %	1.5 %	1 %	2 %	3 %
> 5y	2 %	1 %	1 %	0.5 %	0 %	0 %
Management fee	2.00 %	2.00 %	2.00 %	2.00 %	2.00 %	1.50 %
Performance fee**	20 %	20 %	20 %	20 %	20 %	20 %

* The AIF Manager reserves the right to accept subscriptions that deviate from the determined minimum subscription amount

**7 % of the portion exceeding the marginal revenue

***No subscription fee is charged for subscriptions made through Nordea Bank Abp or through any of its group companies, but for subscriptions submitted for the Nordea series directly to the AIF Manager a subscription fee of 2 % is charged.