

# Statement on principal adverse impacts of investment decisions on sustainability factors

## Financial market participant

**Name** CapMan AIFM Oy

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## Summary

**CapMan AIFM Oy** (743700AYPRIEVU7YGF76, "CapMan") considers principal adverse impacts of its investment decisions on sustainability factors. The present statement is the consolidated principal adverse sustainability impacts statement of CapMan. This principal adverse impacts statement covers the reference period from 1 January to 31 December 2022. Reporting over that reference period on the indicators for adverse impacts of Table 1, and any relevant indicators of Table 2 and 3 of Annex I of the SFDR Delegated Act will take place in 2023, following the measurement of the first reference period (1 January to 31 December 2022)

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

## Impacts and indicators applicable to investments in investee companies

### Climate and other environment-related indicators

1. GHG emissions
2. Carbon footprint
3. GHG intensity of investee companies
4. Exposure to companies active in the fossil fuel sector

5. Share of non-renewable energy consumption and production
6. Energy consumption intensity per high impact climate sector
7. Activities negatively affecting biodiversity-sensitive areas
8. Emissions to water
9. Hazardous waste and radioactive waste ratio

### **Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters**

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

### **Impacts and indicators applicable to real estate**

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

### **Additional impacts and indicators**

#### **Additional climate and other environment-related indicators**

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

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

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

## Description of principal adverse sustainability impacts

The following table includes a description of principal adverse sustainability impacts and metrics and manners of disclosure. Numeric indicators measuring impact will be provided starting from the reference period 1 January to 31 December 2022 by 30 June 2023. Comparison period figures will be provided for the reference period 1 January to 31 December 2023 by 30 June 2024. Explanation of the development from one period to the next will be provided by 30 June 2024.

### Indicators applicable to investments in investee companies

#### Climate and other environment-related indicators

	Adverse sustainability indicator	Metric	Actions taken, actions planned and targets set for the next reference period
GHG emissions	1. GHG emissions	Scope 1 GHG emissions	<p><b>General approach:</b> CapMan has committed to the Science Based Targets initiative, using the Private Equity Sector Science-Based Targets Guidance, which includes investments in private equity, infrastructure and real estate. In addition, CapMan is in the process of establishing a Net-Zero roadmap including target year for when CapMan will be Net-Zero. To this end, CapMan is setting short-term emission reduction targets by 2027 and 2032 on a 2021 baseline, as well as establishing the long term Net-Zero year. CapMan collects and discloses data from its investments on Scope 1, 2, and 3 emissions. CapMan is an active owner and drives the green transition of its portfolio companies.</p> <p><b>Processes and actions:</b> CapMan works with portfolio companies to establish plans to reduce emissions and set them on a decarbonization pathway for both majority and minority held stakes. For fund of funds and credit funds, CapMan seeks to engage with other stakeholders on greenhouse gas emissions topics if material.</p> <p><b>Restrictions:</b> CapMan's restriction list for private equity and infrastructure investments covers activities with highly negative climate impacts (e.g. thermal coal, unconventional fossil energy).</p>
		Scope 2 GHG emissions	
		Scope 3 GHG emissions	
		Total GHG emissions	
	2. Carbon footprint	Carbon footprint	
3. GHG intensity of investee companies	GHG intensity of investee companies		
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	<p><b>General approach:</b> CapMan has limited exposure to the fossil fuel sector. CapMan is an active owner and drives the green transition of its portfolio companies, especially when exposed to fossil fuels. CapMan collects and will disclose data from its investments on whether they are active in the fossil fuel</p>

	5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources	<p>sector, their energy mix and exposure to high impact climate sector (such as transport). Investments in energy production are mainly renewables or with plans to transition the production to renewable sources.</p> <p><b>Processes and actions:</b> CapMan identifies companies with potentially high energy consumption and intensity per high impact climate sector and works together with them to transition to renewable energy sources and improvements in efficiency. Companies that are active in the fossil fuel sector will be subject to implementing a fossil fuel transition plan. For fund of funds and credit funds, CapMan seeks to engage with other stakeholders on energy topics if material.</p> <p><b>Restrictions:</b> CapMan's private equity and infrastructure investment restriction list covers activities with highly negative climate impacts (e.g. thermal coal, unconventional fossil energy and peat). CapMan is allowed to invest in those activities only if the companies transition away from the sector during the holding period.</p>
	6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	
Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	<p><b>General approach:</b> CapMan considers the biodiversity impact of its investments by collecting data from its portfolio companies on whether their operations are located in or near to biodiversity sensitive areas, and whether company operations negatively affect these areas. This data will be disclosed. If biodiversity aspects are deemed material to the portfolio company, mitigation measures will be implemented.</p> <p><b>Processes and actions:</b> Based on data collected, CapMan identifies portfolio companies with sites or operations in or near biodiversity-sensitive areas and works with the portfolio companies on mitigating the negative impacts. For fund of funds and credit funds, CapMan seeks to engage with other stakeholders on biodiversity topics if material.</p> <p><b>Restrictions:</b> CapMan's private equity and infrastructure investment restriction list covers activities that have a severe impact on biodiversity (e.g. peat and palm oil production) and companies that are involved in the development of pesticides or plant protection products unauthorized by the European Food Safety Agency.</p>

Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	<p><b>General approach:</b> CapMan considers the water emissions of its investment by collecting data from its portfolio companies on the existence of water management policies, the water consumed and tonnes of effluents discharged within a certain period. This data will be disclosed.</p> <p><b>Processes and actions:</b> CapMan will work with companies with significant consumption and effluent discharges to create plans and implement efficiency measures and mitigation actions. For fund of funds and credit funds, CapMan seeks to engage with other stakeholders on water related topics if material.</p> <p><b>Restrictions:</b> CapMan's private equity and infrastructure investment restriction list covers companies involved in the development of pesticides or plant protection products unauthorized by the European Food Safety Agency.</p>
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	<p><b>General approach:</b> CapMan considers hazardous and radioactive waste generation of its investment by collecting data from its portfolio companies on the amounts of hazardous and radioactive waste generated within a certain period. This data will be disclosed. If deemed material to the portfolio company, mitigation measures will be implemented.</p> <p><b>Processes and actions:</b> CapMan works with companies with significant hazardous waste generation to create plans and implement efficiency measures, as well as circular approaches as mitigation actions. For fund of funds and credit funds, CapMan seeks to engage with other stakeholders on hazardous and radioactive waste topics if material.</p>

## Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

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

<p>11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises</p>	<p>Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises</p>	<p><b>General approach:</b> CapMan supports the human rights principles described in the UDHR and detailed in the UNGP, and the eight fundamental ILO conventions. CapMan collects data from its portfolio companies on whether they have a policy in place to monitor compliance with the standards for responsible business conduct, or grievance/complaints handling mechanisms to address violations of these standards. CapMan will also be performing a human rights assessment across its value chain. This data will be disclosed.</p> <p><b>Processes and actions:</b> CapMan's commitment to these principles means that CapMan works together with portfolio companies to develop and implement relevant policies and processes.</p> <p><b>Restrictions:</b> CapMan's private equity and infrastructure investment restriction list restricts investments in companies involved in violations of international standards and conventions concerning human rights and labour rights and where the investee company is not able to present clear measures to address the issue and mitigate future breaches.</p>
<p>12. Unadjusted gender pay gap</p>	<p>Average unadjusted gender pay gap of investee companies</p>	<p><b>General approach:</b> CapMan collects and will disclose data on the gender pay gap.</p> <p><b>Processes and actions:</b> Portfolio companies are encouraged to improve gender pay gap disclosures. For fund of funds and credit funds, CapMan seeks to engage with other stakeholders on social and employee topics if material.</p>
<p>13. Board gender diversity</p>	<p>Average ratio of female to male board members in investee companies, expressed as a percentage of all board members</p>	<p><b>General approach:</b> CapMan has set a target to improve gender equality by appointing maximum 70% of one gender to the Board of Directors of its portfolio companies where it has a majority ownership. For minority owned portfolio companies CapMan engages with the other investors to promote this target.</p> <p><b>Processes and actions:</b> CapMan works together with portfolio companies to identify suitable board members that represent the non-dominant gender of the board. For fund of funds and credit funds, CapMan seeks to engage with other stakeholders on this topic if material.</p>
<p>14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)</p>	<p>Share of investments in investee companies involved in the manufacture or selling of controversial weapons</p>	<p><b>General approach:</b> CapMan does not invest in Controversial Weapons.</p> <p><b>Restrictions:</b> Per CapMan's Restriction list there is zero tolerance of involvement in anti-personnel mines, cluster munitions, chemical or biological weapons, nuclear weapons (inside and outside the non-proliferation treaty), blinding laser weapons, non-detectable fragments and incendiary weapons, covering the development, production, use, maintenance, offering for sale, distribution, import or export, storage or transportation of controversial weapons or key components specifically designed for controversial weapons. CapMan also collects data on any involvement from its investments. This data will be disclosed.</p>

## Indicators applicable to real estate

Adverse sustainability indicator		Metric	Actions taken, actions planned and targets set for the next reference period
Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	<b>General approach:</b> CapMan seeks to limit its exposure to the fossil fuel sector through its activities as well as tenant relationships.
Energy efficiency	18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets	<b>General approach:</b> CapMan seeks to improve energy efficiency of its properties during its ownership. The energy improvements can be a result from energy investments (e.g. on-site renewable energy investments), refurbishment projects (e.g. replacing windows with energy-efficient ones) or for example tenant engagement (e.g. energy savings campaigns). <b>Processes and actions:</b> CapMan seeks to engage with property managers, its tenants and other stakeholders to improve the energy efficiency of its properties over their life cycle and to meet its short and long-term targets.

## Additional indicators

Adverse sustainability indicator		Metric	Actions taken, actions planned and targets set for the next reference period
GHG emissions	18. GHG emissions	Scope 1 GHG emissions generated by real estate assets	<b>General approach:</b> Real Estate funds account for approx. 2/3 of CapMan's AUM. CapMan has committed to the Science Based Targets initiative, using the Private Equity Sector Science-Based Targets Guidance, which includes investments in private equity, infrastructure and real estate. In addition, CapMan is in the process of establishing a Net-Zero roadmap including target year for when CapMan will be Net-Zero. To this end, CapMan is setting short-term emission reduction targets by 2027 and 2032 on a 2021 baseline, as well as establishing the long term Net-Zero year. CapMan collects and discloses data from its investments on Scope 1, 2, and 3 emissions. CapMan is an active owner and drives the green transition and energy efficiency of its properties. <b>Processes and actions:</b> CapMan identifies sources of high emissions in properties and works together with property managers, tenants and other stakeholders to establish a plan to reduce emissions through energy efficiency improvements, transition to green energy and for example by nudging tenant behaviour.
		Scope 2 GHG emissions generated by real estate assets	
		From 1 January 2023, Scope 3 GHG emissions generated by real estate assets	
		Total GHG emissions (Also for Real Estate)	



Energy consumption	19. Energy consumption intensity	Energy consumption in GWh of owned real estate assets per square meter	<p><b>General approach:</b> CapMan seeks to improve energy efficiency of its properties during its ownership. The energy improvements can be a result from energy investments (e.g. on-site renewable energy investments), refurbishment projects (e.g. replacing windows with energy-efficient ones) or for example tenant engagement (e.g. energy savings campaigns).</p> <p><b>Engagement:</b> CapMan seeks to engage with property managers, its tenants and other stakeholders to improve the energy efficiency of its properties over their life cycle and to meet its short and long-term targets.</p>
Social and employee matters	4. Lack of a supplier code of conduct	Share of investments in investee companies without any supplier code of conduct (against unsafe working conditions, precarious work, child labour and forced labour)	<p><b>General approach:</b> CapMan is in the process of establishing a Supplier Code of Conduct for its own operations, and has provided a template Supplier Code of Conduct for the portfolio companies to be implemented. On an annual basis, CapMan collects data from its portfolio companies on the existence of a Supplier Code of Conduct. This data will be disclosed.</p> <p><b>Processes and actions:</b> CapMan works together with portfolio companies to implement a Supplier Code of Conducts, based on a template, as well as related processes.</p>
Human rights	9. Lack of a human rights policy	Share of investments in entities without a human rights policy	<p><b>General approach:</b> CapMan collects data from its portfolio companies on an annual basis on the existence of a human rights policy. CapMan has also established a template Social policy that covers human rights considerations for the portfolio companies to implement and adjust based on their materiality aspects. This data will be disclosed.</p> <p><b>Processes and actions:</b> CapMan works together with the portfolio companies to implement the template Social policy.</p>

## Description of policies to identify and prioritise principal adverse sustainability impacts

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

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

## Engagement policies

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

## References to international standards

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

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

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