

# Restriction list

CapMan will not invest in companies related to the following areas if the involvement type and/or the established thresholds (as % of total revenue generated) are exceeded. This Restriction list applies to all new investments starting from December 2022 and is subject to an annual review. Any non-compliance with or deviations from the Restriction list shall be addressed by CapMan Plc's Management Group.

## CapMan Private Equity, Infrastructure and own Balance Sheet Investments Restriction List

	Area	Definition	Involvement type and threshold (as % of revenue)
Norms based	<b>International standards and conventions</b>	Companies involved in violations of international standards and conventions concerning: <ul style="list-style-type: none"> <li>- human rights,</li> <li>- environment,</li> <li>- anti-corruption, or</li> <li>- labour rights,</li> </ul> and where the investee company is not able to present clear measures to address the issue. Exception: if adequate measures to remediate the violation are put into place during the holding period.	Zero tolerance of involvement.
	<b>Controversial weapons</b>	Companies involved 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.	Zero tolerance if involved in 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.

	Area	Definition	Involvement type and threshold (as % of revenue)
<b>Location based</b>	<b>Individuals, entities and countries embargoed by the UN/EU</b>	Companies, countries or individuals on the UN Security Council's Sanctions List or EU Sanctions Map.  For companies, the restriction applies if: - the company is on the sanctions lists, or - an individual is on any of the abovementioned sanctions lists and is either on the Board of Directors or the Chief Executive Officer of the company.	Zero tolerance of involvement.

	Area	Definition	Involvement type and threshold (as % of revenue)
<b>Activity based</b>	<b>Animal testing</b>	Companies involved in animal testing. Exception: for regulated medical purposes.	Production, 5% Distribution, 25%
	<b>Chemical pesticides</b>	Companies involved in the development of plant protection products unauthorized by the European Food Safety Agency.	Production, 5% Distribution, 25%
	<b>Fisheries</b>	Companies involved in bottom trawling, longlining, poisoning and dynamiting for fishery purposes.	Production, 5% Distribution, 25% Related services, 25%
	<b>Fossil fuel: Peat*</b>	Companies involved in using peat as an energy generation source. Exception: allowed if transition is completed during holding period.	Production, 5% Distribution, 25% Related services, 25%
	<b>Fossil fuel: Thermal coal*</b>	Companies involved in thermal coal extraction or thermal coal-fired power generation. Exception: allowed if transition is completed during holding period.	Production, 5% Distribution, 25% Related services, 25%
	<b>Fossil fuel: Unconventional fossil energy*</b>	Companies involved in unconventionally extracted fossil energy and associated methods (e.g. oil sands, deep water drilling, hydraulic fracturing), and extraction from environmentally sensitive areas (e.g. arctic drilling). Exception: allowed if transition is completed during holding period.	Production, 5% Distribution, 25% Related services, 25%

\*The higher thresholds for the production, distribution and related services for Peat, Thermal coal, and Unconventional fossil energy reflect CapMan's values of being an active owner and facilitating the green transition of portfolio companies involved in these sectors.

	Area	Definition	Involvement type and threshold (as % of revenue)
Activity based	<b>Gambling</b>	Companies involved in gambling for money.	Operations, 5% Distribution, 25%
	<b>Illicit drugs</b>	Companies involved in Illicit drugs. Illicit drugs are any drugs or substances that are not legally obtainable and whose use, sale, possession, purchase or transfer is prohibited by law. Exception: for regulated medical purposes.	Zero tolerance of involvement.
	<b>Military combat equipment</b>	Companies involved in products which are i) intended to kill, mutilate or devastate and ii) sold for military purposes.	Production, 0% Distribution, 0% Related services, 50%
	<b>Palm oil</b>	Companies involved in unsustainable production of palm oil. Exception: allowed if investee company meets sectoral best practices for sustainable palm oil (such as Roundtable on Sustainable Palm Oil - RSPO).	Production, 5% Distribution, 25%
	<b>Pornography</b>	Companies involved in the production or distribution of pornographic materials.	Production, 0% Distribution, 25%
	<b>Tobacco</b>	Companies involved in the production and distribution of tobacco products, including cigarettes, cigars, electronic cigarettes and smokeless tobacco products. Exception: for regulated medical purposes.	Production, 0% Distribution, 25%