Published 30 June 2026

Statement on principal adverse impacts of investment decisions on sustainability factors

Financial market participant
Vaaka Partners Oy
LEI: 743700778Q41GPTJ4018

Summary

Vaaka Partners Oy ("Vaaka") considers principal adverse impacts of its investment decisions on sustainability factors and monitors them throughout the investment cycle.

This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January to 31 December 2025.

Sustainability factors encompass environmental, social and employee matters, respect for human rights, and anti-corruption and anti-bribery matters, as defined in Article 2(24) of Regulation (EU) 2019/2088. By considering sustainability factors as part of the investment process, Vaaka aims to reduce investment-related risks, enhance investment returns and contribute to positive societal outcomes.

Description of the principal adverse impacts on sustainability factors

Vaaka's Responsible Investment Policy ("RI Policy") guides its investment activities. The RI Policy is based on the view that identifying and actively managing relevant sustainability factors can reduce both sustainability-related and financial risks, while also supporting value creation.

Sustainability factors are integrated throughout the investment lifecycle, including screening, due diligence, investment decision-making, and value creation during the holding period. During the investment process, Vaaka identifies and assesses material ESG risks and opportunities at both sector and company level and incorporates these into investment decision-making.

Principal adverse impacts ("PAIs") on sustainability factors are considered as part of this process. PAIs are identified and assessed during due diligence using a structured ESG framework and are monitored throughout the ownership period. The relevance and materiality of PAIs are determined based on factors such as the company's sector, business model, and size.

Further information on the PAIs considered, the related indicators, and actions taken during the reference period is set out the statement on principal adverse impacts of investment decisions on sustainability factors.

Indicators applicable to investments in investee companies						
Adverse sustainability indicator		**Metric**	**Impact 2025**	**Impact 2024**	**Explanation**	**Actions taken, and actions planned and targets set for the next reference period**
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS						
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	557 tCO2e	1,563 tCO2e	Data covers 100% of the investments.	Vaaka's investment focus is on business services and technology companies, which typically have limited direct impact on climate and other environmental matters. In 2025, Vaaka introduced minimum ESG requirements for its investee companies. Although no CO2 emissions reduction targets have been set at investment level, Vaaka continues to provide guidance to its companies on calculating CO2 emissions, and all investee companies calculate their Scope 1, 2 and 3 emissions. At the investee company level, there are existing targets to reduce emissions.
		Scope 2 GHG emissions	421 tCO2e	629 tCO2e	Data covers 100% of the investments.	
		Scope 3 GHG emissions	43,291 tCO2e	54,505 tCO2e	Data covers 100% of the investments.	
		Total GHG emissions	44,269 tCO2e	56,698 tCO2e		
	2. Carbon footprint	Carbon footprint	42.0 tCO2e / €M invested	59.6 tCO2e / €M invested	Data covers 100% of the investments.	
	3. GHG intensity of investee companies	GHG intensity of investee companies	33.9 tCO2e / €M revenue	64.1 tCO2e / €M revenue	Data covers 100% of the investments.	
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	0%	0%	Data covers 100% of the investments.	According to Vaaka's RI Policy, Vaaka applies enhanced scrutiny to industries with heightened climate-related risks (e.g., fossil fuel energy).
	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	57%	49%	Data covers 100% of the investments.	No specific actions are planned. We will monitor the trend in 2026 and consider further actions based on developments.

		renewable energy sources, expressed as a percentage of total energy sources				
	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	NACE Sector C: 0.01 GWh/€M NACE Sector G: 0.001 GWh/€M NACE Sector L: 0.03 GWh/€M	NACE Sector C: 0.02 GWh/€M NACE Sector G: 0.01 GWh/€M NACE Sector L: 0.03 GWh/€M	Data covers 100% of the investments. 5 out of 12 investee companies (41.7%) operate in high-impact climate sectors. NACE sector C: Manufacturing NACE Sector G: Wholesale and retail trade; repair of motor vehicles and motorcycles NACE Sector L: Real estate activities	Vaaka's investment focus is on business services and technology companies, which typically have limited direct impact on climate and other environmental matters. If Vaaka invests in companies in high-impact climate sectors, climate-related and other environmental adverse impacts will be identified and assessed during due diligence. No additional actions planned.
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	0%	0%	Data covers 100% of the investments.	Given Vaaka's investment focus, it is unlikely that Vaaka will invest in companies with sites or operations located in or near biodiversity-sensitive areas where the activities of those companies negatively affect such areas.

		negatively affect those areas				
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0.00 tonnes / €M invested	0.00 tonnes / €M invested	Data covers 100% of the investments.	No actions required.
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	0.94 tonnes / €M invested	1.32 tonnes / €M invested	Data reviewed covers 100% of the investments. 3 out of 12 investee companies (25%) reported hazardous waste generation in 2025, with one investee company accounting for 76% of the total reported hazardous waste.	No actions planned.
INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS						
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for	0%	0%	Data reviewed covers 100% of the investments. Most investee companies have formal policies for responsible business conduct	Several investee companies have implemented relevant policies. In 2025, we provided further guidance to investee companies on human rights due diligence and suggested steps for improving maturity in order to implement mechanisms for monitoring compliance

	Development (OECD) Guidelines for Multinational Enterprises	Multinational Enterprises			covering human rights, labour rights and the environment, but they have not explicitly declared compliance with the UNGC principles or the OECD Guidelines for Multinational Enterprises.	with the OECD Guidelines for Multinational Enterprises. Considering the portfolio construction, this process is not mandatory.
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	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	75%	100%		
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	15%	14%		In 2025, we provided further guidance to investee companies on minimum requirements and best practices relating to employees and culture, including compensation systems and a structured approach to salary reviews. In connection with M&A, particular attention is paid to harmonizing policies where legacy practices may create inconsistencies. We have presented equal pay and pay equity analysis to investee companies as a best practice KPI.

						We will continue to monitor the indicator and arrange training if necessary.
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	12%	17%	Data covers 100% of the investments.	Requirement to include female candidates in the recruitment pool has been implemented, and the female-to-male ratio in board has continued to improve. We will continue to drive progress through our board work and guidance.
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0%	0%	Data covers 100% of the investments. Vaaka does not invest in companies operating in the arms industry, in accordance with its RI Policy.	Vaaka complies with its RI Policy. No other actions required.

Other indicators for principal adverse impacts on sustainability factors

In addition to the mandatory indicators above, Vaaka considers two additional indicators:

“Investments in companies without carbon emission reduction initiatives”: This indicator is part of the set of additional indicators related to climate and the environment, as defined in the SFDR (Table 2, indicator 4). We have chosen this indicator to drive awareness and ambition among companies regarding emission reduction initiatives.

“Number of days lost to injuries, accidents, fatalities or illness”: This indicator is part of the set of additional indicators related to social and employee matters, respect for human rights, anti-corruption and anti-bribery, as defined in the SFDR (Table 3, indicator 3). We have chosen this indicator because employee engagement is crucial to a company’s success and it relates directly to employee wellbeing.

Adverse sustainability indicator		Metric	Impact 2025	Impact 2024	Explanation	Actions taken, and actions planned and targets set for the next reference period
Emissions	Investments in companies without carbon emission reduction initiatives	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	83%	85%	Data covers 100% of the investments. 2 out of 12 investee companies are committed to SBTi	Vaaka monitors all carbon emission reduction targets set by the investee companies, including internally set targets that are not aligned with the Paris Agreement. Following increased awareness, investee companies are considering appropriate ways to commit to carbon emission initiatives.
Social and employee matters	Number of days lost to injuries, accidents, fatalities or illness	Number of workdays lost to injuries, accidents, fatalities or illness of investee companies expressed as a weighted average	3,288	4,832	Data covers 100% of the investments.	We continuously monitor implementation of the relevant employee and safety policies in the investee companies to strive good development.

Description of policies to identify and prioritize principal adverse impacts on sustainability factors

Vaaka's Responsible Investment Policy (RI Policy) describes the policies and assessment process used to identify and prioritise the principal adverse sustainability impacts of its investment decisions, as well as the approach to ongoing monitoring. The RI Policy was approved by Vaaka's Board of Directors on 11 December 2025, replacing the previous Principles for Responsible Investment.

The RI Policy integrates sustainability factors, including principal adverse sustainability impacts, across five phases of the investment cycle:

i) Screening and pre-investment: The case team identifies potential sustainability risks and applies Vaaka's exclusion criteria. Vaaka does not invest in companies in the gambling, tobacco, adult entertainment, human cloning, or arms industries, and applies enhanced scrutiny to industries or companies where a heightened exposure to climate-related risk is identified, declining to proceed where such exposure is material. High-risk cases are flagged early.

ii) Due diligence: The case team applies Vaaka's ESG Due Diligence checklist, which may form part of commercial or HR due diligence or be supported by an external advisor. Material sustainability risks, including principal adverse impacts, are documented.

iii) Investment decision: The case team presents its ESG findings to the Investment Committee, which may reject a potential investment where the sustainability risk is assessed as too high.

iv) Ownership and value creation: Material ESG findings are incorporated into each company's 100-day and longer-term plans. Investee companies are expected to meet Vaaka's minimum ESG requirements within one year of acquisition. Each company's board reviews ESG matters at least annually, a materiality assessment is encouraged, and the company team tracks progress against the agreed action plans.

v) Exit: ESG progress and maturity are considered in evaluating exit readiness and are reflected in exit documentation. The company team assesses the need to commission third-party ESG vendor due diligence.

Vaaka's Sustainability working group oversees how principal adverse impacts are considered. The group consists of the Chief Operating Officer, an Investment Director, and a Fund Administration Specialist, and the Chief Operating Officer steers ESG reporting. The group also prepares Vaaka's annual sustainability report and this principal adverse impacts statement and presents them to the Board.

Engagement policies

Vaaka is dedicated to promoting good stewardship through its engagement activities. The primary objectives of these activities are to support long-term value creation and mitigate risk. Being an active owner is an important element of Vaaka's investment strategy. By encouraging improved management of sustainability factors in investee companies, Vaaka seeks to enhance risk management, support investment returns and contribute to positive societal outcomes.

References to international standards

Vaaka adheres to the UN Principles of Responsible Investment (PRI), which guide its efforts in line with the six principles for responsible investment. In assessing sustainability factors, Vaaka also takes into account the UN Global Compact principles. Vaaka aims to support and implement the fundamental values of these principles, which address human rights, labour standards, environmental matters and anti-corruption.

Historical comparison

Historical comparison year: 1 January 2024 – 31 December 2024.