

## SUSTAINABILITY-RELATED DISCLOSURES – POSTEFEDELTÀ SENIOR PIÙ

### Summary

The insurance-based investment product “Postefedeltà Senior Più” is a class I financial product that promotes environmental and/or social characteristics in accordance with Article 8 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 but does not have sustainable investment as its objective. **Compliance with the promotion of such characteristics depends on investing in the investment option in the table below and holding it during the investment period in the financial product.**

INVESTMENT OPTION	CATEGORY OF OPTION
Separately Managed Account “Poste Vita Valore Solidità”	Art.8 – Regulation (EU) 2019/2088

Such investment option promotes environmental and/or social characteristics and it represents 50% of the product’s investment options. Indeed, the product consists also of a second element, represented by the Separately Managed Account Posta ValorePiù, that does not promote environmental and/or social characteristics.

In particular, the promotion of environmental and/or social characteristics by the Separately Managed Account Poste Vita Valore Solidità takes place through the maintenance of a minimum level of ESG rating at portfolio level and the exclusion of issuers characterized by a high environmental impact.

The selection of issuers’ securities by Poste Vita Valore Solidità is carried out according to the following criteria:

#### ESG integration

- The portfolio aims at attaining an ESG weighted average score equal to or greater than BBB<sup>1</sup> or other equivalent threshold in relation to investments in corporate issuers.
- • The portfolio aims at attaining an ESG weighted average score equal to or greater than BBB<sup>1</sup> or other equivalent threshold in relation to investments in government issuers.

#### SRI exclusions

- The portfolio does not invest in issuers active in controversial sectors for ESG standards. Specifically, companies which have a significant involvement in coal mining or in non-conventional oil&gas exploration and production activities and receive an ESG rating equal to or less than B<sup>1</sup> or other equivalent threshold, will not be eligible for investment.

Such criteria represent the binding elements of the strategy used by Poste Vita Valore Solidità to promote environmental and/or social characteristics.

The assessment of good governance practices by investee companies is included in the investment strategy of Poste Vita Valore Solidità, because it is an integral part of the ESG assessment of corporate issuers.

The current investment strategy of Poste Vita Valore Solidità, whose management is currently delegated to BancoPosta Fondi SGR S.p.A., requires that at least 65% of its resources are invested according to the ESG integration criteria and SRI exclusions described above. Each Separately Managed Account represents 50% of the overall investment in the product.

The monitoring of the environmental and/or social characteristics of Poste Vita Valore Solidità occurs through ESG ratings, provided by a data provider that supports the Company in the ESG assessment of issuers, and on the basis of which the weighted average portfolio rating is determined. As part of the processes related to investment management, the Company conducts monitoring aimed at checking the compliance of the activities carried out by the Delegated Portfolio Manager with the guidelines for the implementation of the strategy for the promotion of environmental and/or social characteristics, so to ensure compliance with the above threshold (65%). For this purpose, mechanisms for controlling and reporting on the activities of the Delegated Portfolio Manager are defined.

1 The reference scale, in ascending order, is as follows: CCC (lowest score), B, BB, BBB, A, AA, AAA (highest score).

The indicators that will be used to measure the attainment of the environmental and/or social characteristics promoted by Poste Vita Valore Solidità are:

- ESG weighted average portfolio rating for corporate issuers.
- ESG weighted average portfolio rating for government issuers.
- Exposure to coal and non-conventional oil&gas issuers with an ESG rating equal to or less than B or other equivalent threshold.

The Company verifies the sustainability profile of government and corporate portfolios by way of ESG ratings calculated by external providers specialized in these analyses. The ESG rating is representative of the environmental, social and governance opportunities and risks to which an issuer is exposed and considers the issuer's management of those risks. The ESG rating of the portfolio (both for corporate component and government component) is obtained as a weighted average of the ESG ratings for issuers of the financial securities in the portfolio that are covered by data provider's research. In addition, the analyses carried out by the data provider are aimed at identifying whether an issuer belongs to the coal or oil&gas sectors. Any estimated data depends on the methodologies of the data provider and its coverage in terms of issuers; therefore, it is not possible to define this quota ex-ante. The quality of the data is verified through the evaluation of the methodologies applied by the data provider and the adoption, if necessary, of any measures to protect it.

### **No sustainable investment objective**

This financial product promotes environmental or social characteristics but does not have as its objective sustainable investment.

### **Environmental or social characteristics of the financial product**

The insurance-based investment product "Postefedeltà Senior Più" is a class I product that promotes, among others, environmental and/or social characteristics in accordance with Article 8 of Regulation (EU) 2019/2088 of the European Parliament and Council of 27 November 2019. In particular, the promotion of environmental and/or social characteristics is determined by the investments of the Separately Managed Account Poste Vita Valore Solidità, through the maintenance of a minimum level of ESG rating at portfolio level and the exclusion of issuers characterized by a high environmental impact, as further specified in the next section "Investment Strategy".

### **Investment strategy**

In accordance with the guidelines given to the current Portfolio Delegated Manager (BancoPosta Fondi SGR S.p.A.), Poste Vita Valore Solidità's investment decisions are also made on the basis of non-financial analysis that takes ESG factors into consideration.

The selection of issuers is indeed carried out by Poste Vita Valore Solidità according to the following criteria:

#### ESG integration

- The portfolio aims at attaining an ESG weighted average score equal to or greater than BBB or other equivalent threshold in relation to investments in corporate issuers.
- The portfolio aims at attaining an ESG weighted average score equal to or greater than BBB or other equivalent threshold in relation to investments in government issuers.

#### SRI exclusions

- The portfolio does not invest in issuers active in controversial sectors for ESG standards. Specifically, companies which have a significant involvement in coal mining or in non-conventional oil&gas exploration and production activities and receive an ESG rating equal to or less than B or other equivalent threshold, will not be eligible for investment.

The achievement of a weighted average portfolio ESG rating equal to or higher than BBB or other equivalent threshold, both for the component invested in corporate issuers and for the component invested in government issuers, and the application of SRI exclusions represent the binding elements of the strategy used by Poste Vita Valore Solidità for the promotion of environmental and/or social characteristics.

The investment strategy of Poste Vita Valore Solidità requires that at least 65% of its resources are invested according to the ESG criteria described above.

Moreover, the investments of this product, included those made by the Separately Managed Account Posta ValorePiù, are made consistently with the Responsible Investment Policy and with other policies adopted by the Company on sustainability risk integration.

With regard to the “Poste Vita Group’s Responsible Investment Policy”, it is envisaged that sustainability risks are managed through exclusion strategies, ESG assessment of investment operations and periodic monitoring of the portfolio ESG profile. Particular attention is paid to specific ESG-related risks, for which the Group has set up dedicated procedures aimed at monitoring issuers in sectors deemed to be most exposed to social and environmental risks: this commitment and the related policies are formalized within the “Poste Vita Group’s Guidelines for Investment in Sensitive Sectors.” For further details, please refer to the documents available at <https://postevita.poste.it/compagnia/gruppo-assicurativo-poste-vita.html>.

The assessment of good governance practices by investee companies is included in the investment strategy adopted by Poste Vita Valore Solidità, because it is an integral part of the ESG assessment of corporate issuers and therefore of the weighted average portfolio rating for corporate investments.

### **Proportion of investments**

The current investment strategy of Poste Vita Valore Solidità requires that at least 65% of its resources are invested according to the ESG integration criteria and SRI exclusions described above. Currently, monetary funds are the only type of indirect exposures allowed in Poste Vita Valore Solidità’s portfolio.

Each Separately Managed Account represents 50% of the overall investment in the product.

### **Monitoring of environmental or social characteristics**

The monitoring of the environmental and/or social characteristics of Poste Vita Valore Solidità occurs through ESG ratings, provided by a data provider that supports the Company in the ESG assessment of issuers, and on the basis of which the weighted average portfolio rating is determined. As part of the processes related to investment management, the Company conducts monitoring aimed at checking the compliance of the activities carried out by the Delegated Portfolio Manager with the guidelines for the implementation of the strategy for the promotion of environmental and/or social characteristics, so to ensure compliance with the above threshold (65%). To this purpose, mechanisms are established for the control and reporting of activities carried out by the Delegated Portfolio Manager.

### **Methodologies**

The indicators that will be used to measure the attainment of the environmental and/or social characteristics promoted by Poste Vita Valore Solidità are:

- ESG weighted average portfolio rating for corporate issuers.
- ESG weighted average portfolio rating for government issuers.
- Exposure to coal and non-conventional oil&gas issuers with an ESG rating equal to or less than B or other equivalent threshold.

### **Data sources and processing**

The Company verifies the sustainability profile of government and corporate portfolios by way of ESG ratings calculated by external providers specialized in these analyses. The ESG rating is representative of the risks and opportunities linked to environmental, social and governance factors to which an issuer is exposed and takes into account the issuer’s management of such risks. The ESG rating of the portfolio (both for corporate component and government component) is obtained as a weighted average of the ESG ratings for issuers of the financial securities in the portfolio that are covered by data provider’s research. In addition, data provider’s analysis is also aimed at identifying if an issuer belongs to coal mining or non-conventional oil&gas sectors.

Any estimated data depends on the methodologies of the data provider and the relative coverage rate of issuers; therefore, it is not possible to define the proportion of such data ex-ante. The data quality is verified through the evaluation of the methodologies applied by the data provider and the adoption, if needed, of any measures to ensure it.

### **Limitations to methodologies and data**

The main limitation of the methodology analysis above mentioned is represented by the coverage rate of ESG information on portfolio’s issuers by the data provider. To this purpose, the guidelines given to the Delegated Portfolio Manager envisage that Poste Vita Valore Solidità invests primarily in securities of issuers for which an ESG score is made available by the data provider.

### **Due diligence**

Due diligence activities are carried out by evaluating the ESG profile of investee issuers according to the criteria and methodologies described in the previous sections and checking whether the portfolio complies with the minimum threshold of ESG rating defined by Poste Vita Valore Solidità's investment strategy.

### **Engagement policies**

Investments are made consistently with the policies adopted by the Company on sustainability risk integration (to which please refer for more details <https://postevita.poste.it/compagnia/gruppo-assicurativo-poste-vita.html>) as mentioned in the product's precontractual documentation. However, engagement policies are not part of the strategy adopted by Poste Vita Valore Solidità to promote environmental and/or social characteristics.