

SUSTAINABILITY-RELATED DISCLOSURES – POSTEPREMIUM SOLUZIONE CRESCITA

Summary

The insurance-based investment product “PostePremium Soluzione Crescita” is a multi-branch 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 at least one of the options included in the list below and holding at least one of such options during the investment period in the financial product.**

INVESTMENT OPTIONS	CATEGORY OF OPTION
Separately Managed Account Poste Vita Valore Solidità	Art.8 - Regulation (UE) 2019/2088
Internal Fund Poste Vita Crescita Bilanciata	Art.8 - Regulation (UE) 2019/2088
Internal Fund Poste Vita Crescita Azionaria	Art.8 - Regulation (UE) 2019/2088

Such investment options promote environmental and/or social characteristics and they represent 100% of the product's investment options.

The promotion of environmental and/or social characteristics by the Separately Managed Account Poste Vita Valore Solidità (hereinafter “Separately Managed Account”) takes place through the maintenance of a minimum level of ESG rating at portfolio level and the exclusion of issuers characterized by lower categories rating according to the reference scale¹.

The selection of issuers' securities by the Separately Managed Account 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 BBB¹ or other equivalent threshold in relation to investments in corporate and government issuers;

SRI exclusions

- The portfolio does not invest in issuers which receive an ESG rating equal to or less than B1 or other equivalent threshold.

In addition, regarding the Internal Funds Poste Vita Crescita Bilanciata and Poste Vita Crescita Azionaria (hereinafter “Internal Funds”), the promotion of environmental and/or social characteristics takes place through the predominant investment in UCITS that promote environmental and/ or social characteristics, or that pursue sustainable investment objectives.

The strategy adopted by the Internal Funds selects UCITS through a quantitative and qualitative evaluation process based on two levels: analysis of the management company of the UCITS potentially subject to investment and analysis of the single UCITS. Specifically, at the level of the asset management company, preference is given to companies that (i) adhere to international organizations that promote consideration of ESG issues, (ii) have an explicit commitment to responsible investment – through the adoption of specific policies on the subject – regarding assets under management and (iii) have a structure dedicated to the application of the responsible investment policy. At the single UCITS level, preference is given to investments in UCITS that apply a responsible investment strategy as stated in the fund's official documentation, i.e., that (i) promote, among others, environmental or social characteristics or a combination of those (pursuant to Article 8 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019) or (ii) have sustainable investments as their objective (pursuant to Article 9 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019).

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

Such criteria represent the binding elements of the strategy used to promote environmental and/or social characteristics. The assessment of good governance practices by investee companies of the Separately Managed Account is included in the investment strategy, because it is an integral part of the ESG assessment of corporate issuers. For the component invested in funds, on the other hand, the methodology adopted for the selection of UCITS, that apply one of the responsible investment strategies described, is also based on considerations relating to the governance adopted by the management companies of the UCITS themselves as detailed above.

The current investment strategy of the Separately Managed Account requires that the share of investments that meet ESG criteria is at least 65% of resources. The current investment strategy of the Internal Funds, whose management is currently delegated to BancoPosta Fondi SGR S.p.A. (hereinafter "Delegated Portfolio Manager"), requires that at least 65% for the Internal Funds Poste Vita Crescita Bilanciata and at least 65% for the Internal Funds Poste Vita Crescita Azionaria of its resources are invested in UCITS that meet the asset management company level criteria and one of the requirements at single UCITS level, as described above. Once the initial Gradual Reallocation phase has been completed, the total investment of the product will be divided according to one of two Predefined Combinations, which provide for different percentage allocations between the Separately Managed Account and the Internal Fund Poste Vita Crescita Bilanciata or between the Separately Managed Account and the Internal Fund Poste Vita Crescita Azionaria, depending on the Internal Fund selected by the customer.

With regard to the Separately Managed Account, the monitoring of environmental and/or social characteristics is carried out by ESG ratings, provided by the 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. Regarding the investments of the Internal Funds invested in funds used to comply with the environmental or social characteristics promoted by the financial product, on the other hand, the Company provides for periodic monitoring and control, reporting and discussion mechanisms. Specifically, during the selection phase, it is verified that the UCITS potentially subject to investment by the Internal Funds have adopted one of the responsible investment strategies mentioned above.

Moreover, as part of the processes related to the management of investments, the Company carries out monitoring aimed at checking the compliance of the Delegated Portfolio Manager's work with the guidelines for the implementation of the policy for the promotion of environmental and/or social characteristics, so that compliance with the above thresholds is guaranteed. For this purpose, mechanisms for controlling and reporting on the activities of the Delegated Portfolio Manager are defined.

The indicators that will be used to measure the attainment of the environmental and/or social characteristics promoted by Separately Managed Account are:

- ESG weighted average portfolio rating for corporate and government issuers;
- Issuers with an ESG rating equal to or less than B or other equivalent threshold.

On the other hand, the indicator that will be used to measure compliance with the environmental and/or social characteristics promoted by the Internal Fund Poste Vita Crescita Bilanciata and the Internal Fund Poste Vita Crescita Azionaria, is represented by the percentage of investments in UCITS that meet all the asset management company level criteria described above and apply a responsible investment strategy (among those previously mentioned), as declared in the official documentation of the UCITS.

Regarding the Separately Managed Account, the sustainability profile of government and corporate portfolios is verified using ESG ratings calculated by external providers specialized in this type of analysis. 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 (for both corporate and government purposes) is calculated as a weighted average of the ESG ratings of the issuers of the financial instruments in the portfolio and covered by the data provider's research. 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.

In addition, the monitoring of the environmental and/or social characteristics promoted by the Internal Funds and the related indicator is based on the information found on the criteria described in the "Investment strategy" section, based on what is declared in the official documentation relating to the individual UCIs and on information taken from publicly available sources. This information is analysed and processed to verify the fulfilment of these criteria for the purposes of the strategy for the promotion of environmental and/or social characteristics. Given the peculiarities of the methodology adopted, the use of estimated information and data is not possible.

The Separately Managed Account has not designated an index as a reference benchmark.

The Internal Fund Poste Vita Crescita Bilanciata has designated an index as a reference benchmark; 70% of such index consists of indices that consider ESG factors. The Internal Fund Poste Vita Crescita Azionaria has designated an index as a reference benchmark; 95% of such index consists of indices that consider ESG factors. However, the Internal Funds are actively managed so that the benchmark should be considered an indicative comparison tool aimed at guiding the management of the internal insurance funds.

No sustainable investment objective

This financial product promotes environmental and/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 "PostePremium Soluzione Crescita" is a multi-branch 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.

For the Separately Managed Account the promotion of environmental and/ or social characteristics is determined by maintaining a minimum level of ESG rating at portfolio level and excluding issuers characterized by lower categories rating according to the reference scale, as better specified in the following section "Investment strategy".

On the other hand, regarding the Internal Funds, the promotion of environmental and/or social characteristics is determined by the predominant investment in UCITS that promote environmental and/or social characteristics, or that pursue sustainable investment objectives, as better specified in the next section "Investment strategy".

Investment strategy

In accordance with the guidelines provided to the current Delegated Portfolio Manager and in line with the respective regulations, the investment choices of the Separately Managed Account and the Internal Funds are also made based on non-financial analyses that take into account ESG factors.

The selection of issuers' securities by the Separately Managed Account 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 or other equivalent threshold in relation to investments in corporate and government issuers;

SRI exclusions

- The portfolio does not invest in issuers which receive an ESG rating equal to or less than B or other equivalent threshold.

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 for the purpose of promoting environmental and/or social characteristics.

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

The current investment strategy of the Separately Managed Account requires that the share of investments that meet ESG criteria is at least 65% of resources.

The selection of UCITS by the Internal Funds is made through a quantitative and qualitative assessment process based on two levels: analysis of the asset management company of the UCITS potentially being invested in and analysis of the single UCITS.

At the asset management company level, preference is given to companies that (i) adhere to international organizations that promote the consideration of ESG issues, (ii) have an explicit commitment to responsible investment - through the adoption of specific policies on the subject - regarding assets under management, and (iii) have a structure dedicated to the application of the responsible investment policy.

At the single UCITS level, preference shall be given to investments in UCITS that apply one responsible investment strategy as stated in the fund's official documentation, i.e., that (i) promote, among others, environmental or social characteristics or a combination of those (pursuant to Article 8 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019) or (ii) have sustainable investments as their objective (pursuant to Article 9 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019).

For the purpose of the promotion of environmental and/or social characteristics by the Internal Funds, the analyses aimed at verifying the integration of the above ESG factors, i.e., analysis of the asset management company of the UCITS potentially being invested in and analysis of the single UCITS, are the binding elements of the strategy used.

The current investment strategy of the Internal Fund Poste Vita Crescita Bilanciata and the Internal Fund Poste Vita Crescita Azionaria, the management of which is currently delegated to BancoPosta Fondi SGR S.p.A., requires at least 65% of their resources to be invested in UCITS that meet the asset management company level criteria in (i), (ii), (iii) and one of requirements at single UCITS level in (i) and (ii) as described above.

With regard to the Internal Funds, the methodology adopted for the selection of UCITS that promote, among others, environmental or social characteristics or a combination of those (pursuant to Article 8 of Regulation (EU) 2019/2088), or that have sustainable investments as their objective (pursuant to Article 9 of Regulation (EU) 2019/2088), is also based on considerations regarding the governance adopted by the asset management companies of the UCITS themselves as detailed above.

In addition, the investments of this product are made consistently with the policies adopted by the Company on sustainability risk integration. Regarding 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 procedures aimed at monitoring issuers belonging to 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 Guideline 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>.

Proportion of investments

The current investment strategy of the Separately Managed Account envisages that the share of investments that meet the ESG integration and SRI exclusion criteria specified above is at least 65% of the resources.

The current investment strategy of the Internal Funds requires that at least 65% for the Internal Fund Poste Vita Crescita Bilanciata and at least 65% for the Internal Fund Poste Vita Crescita Azionaria of their resources is invested in UCITS that meet all the asset management company level criteria and apply one responsible investment strategy set forth above. Currently, direct exposures by both Internal Funds are not envisaged, except for bank account deposits.

In case the client opts to invest in the Internal Fund Poste Vita Crescita Bilanciata, at the end of the Gradual Reallocation phase the overall investment of the product will then be divided according to one of the two Predefined Combinations that provide for different allocations between the "Posta ValorePiu" Separately Managed Account and the Internal Fund Poste Vita Crescita Bilanciata.

In case the client opts to invest in the Internal Fund Poste Vita Crescita Azionaria, at the end of the Gradual Reallocation phase the overall investment of the product will then be divided according to one of the two Predefined Combinations that provide for different allocations between the "Posta ValorePiu" Separately Managed Account and the Internal Fund Poste Vita Crescita Azionaria.

Monitoring of environmental or social characteristics

Regarding the Separately Managed Account, the monitoring of environmental and/or social characteristics is carried out by ESG ratings, provided by the data provider that supports the Company in the ESG assessment of issuers, and based on which the weighted average portfolio rating is determined.

With regard to the Internal Funds, the Company provides for periodic monitoring and mechanisms for control, reporting, and discussion. Specifically, at the selection stage, it is verified that UCITS potentially subject to investment by the Internal Fund Poste Vita Crescita Bilanciata and the Internal Fund Poste Vita Crescita Azionaria have adopted one of the above-mentioned responsible investment strategies. Subsequently, 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 policy for the promotion of environmental and/or social characteristics, so that compliance with the above threshold is ensured. To this end, mechanisms are defined for monitoring and reporting on the activities of the Delegated Portfolio Manager.

Methodologies

The indicators that will be used to measure the attainment of the environmental and/or social characteristics promoted by Separately Managed Account are:

- ESG weighted average portfolio rating for corporate and government issuers;
- Issuers with an ESG rating equal to or less than B or other equivalent threshold.

On the other hand, the indicator that will be used to measure compliance with the environmental and/or social characteristics promoted by the Internal Funds, is represented by the percentage of investments in UCITS that meet all the asset management company level criteria described above and apply a responsible investment strategy (among those previously mentioned), as declared in the official documentation of the UCITS.

Data sources and processing

Regarding the Separately Managed Account, the sustainability profile of government and corporate issuers is verified using ESG ratings calculated by external providers specialized in this type of analysis. 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 (for both corporate and government purposes) is calculated as a weighted average of the ESG ratings of the issuers of the financial instruments in the portfolio and covered by the data provider's research. 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.

The monitoring of the environmental and/or social characteristics promoted by the Internal Funds and their related indicators is based on the information found with respect to the criteria described in the "Investment Strategy" section. Monitoring relies on what is stated in the official documentation of UCITS and information collected from publicly available sources (e.g. website of fund houses). This information is analyzed and processed in order to verify whether the criteria required for the promotion of environmental and/or social characteristics are met. Due to the peculiarities of the methodology adopted, the use of estimated information and data is not envisaged.

Limitations to methodologies and data

Regarding the Separately Managed Account, 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. For 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.

On the other hand, there are no methodology limitations for the investments of the Internal Funds.

Due diligence

Regarding the Separately Managed Account, 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 verify that the minimum ESG rating levels identified by the Internal Fund's investment strategy are respected.

Due diligence activities for the investments in funds of the Internal Fund Poste Vita Crescita Bilanciata and the Internal Fund Poste Vita Crescita Azionaria are carried out by verifying the criteria at the level of the asset management company and of UCITS described in the "Investment Strategy" section, in order to identify UCITS that are eligible according to the strategy for the promotion of environmental and/or social characteristics envisaged for the Internal Funds.

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/compania/gruppo-assicurativo-poste-vita.html>) as mentioned in the product's precontractual documentation. However, engagement policies are not part of the strategy adopted by the three investment options to promote environmental and/or social characteristics.

Designated reference benchmark

The Internal Fund Poste Vita Crescita Bilanciata has designated an index as a reference benchmark; 70% of such index consists of indices that consider ESG factors, weighted as follows:

- 10% - ICE Euro Large Cap Corporate ESG Tilt Index (Gross Total Return - Euro).
- 60% - MSCI ACWI Selection (Net Total Return – Euro).

The Internal Fund Poste Vita Crescita Azionaria has designated as its benchmark an index composed of 95% of the following ESG index: MSCI ACWI Selection (Net Total Return – Euro).

UCITS selected by the Internal Fund Poste Vita Crescita Bilanciata and by the Internal Fund Poste Vita Crescita Azionaria adopt responsible investment strategies that align the environmental and/or social characteristics promoted with the specific ESG features of ESG indices that are part of the benchmark. However, the Internal Fund Poste Vita Crescita Bilanciata and the Internal Fund Poste Vita Crescita Azionaria are actively managed so that the benchmark should be considered an indicative comparison tool aimed at guiding the management of the Internal Funds.

Further information on the methodologies used for the calculation of the above mentioned ESG indices are available at this page: <https://www.msci.com/index-methodology> and <https://indices.ice.com/>.