

SUSTAINABILITY-RELATED DISCLOSURES – POSTE PROGETTO VALORE 360

Summary

The insurance-based investment product “Poste Progetto Valore 360” 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
Internal Fund Poste Vita Valore Equilibrato	Art.8 - Regulation (UE) 2019/2088
Internal Fund Poste Vita Valore Dinamico	Art.8 - Regulation (UE) 2019/2088
Internal Fund Poste Vita Valore Sviluppo	Art.8 - Regulation (UE) 2019/2088

Such investment options correspond to 75% of the product’s investment options. The product has an additional investment option, corresponding to the Separately Managed Account Posta ValorePiù, which does not promote environmental and/or social characteristics.

The promotion of environmental and/or social characteristics by the internal insurance funds available under “Poste Vita Valore Equilibrato”, “Poste Vita Valore Dinamico”, “Poste Vita Valore Sviluppo” (hereinafter the “Internal Funds”), 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).

Such criteria represent the binding elements of the strategy used by Internal Funds for the promotion of environmental and/or social characteristics. 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 Internal Funds, whose management is currently delegated to BancoPosta Fondi S.p.A. SGR (hereinafter the ‘Delegated Portfolio Manager’), requires that, for each internal fund, the portion invested in UCITS that meet the criteria at management company level and apply one of the responsible investment strategies, as described above, must amount to at least 65% of the assets.

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 threshold is guaranteed.

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.

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 UCITS and on information taken from publicly available sources (e.g. website of the UCITS management company). 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 Internal Funds have not designated an index as a reference benchmark.

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 "Poste Progetto Valore 360" is a multi-branch financial 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 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 (BancoPosta Fondi S.p.A. SGR) and in line with the provisions of the internal fund regulations, the investment choices of the Internal Funds are also made based on non-financial analyses that take into account ESG factors.

The selection of UCITS by the Internal Funds is made through a quantitative and qualitative assessment process based on two levels: analysis of the management company of the UCITS potentially subject to investment 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 purposes of 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. analyses 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.

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.

The current investment strategy of the Internal Funds requires that at least 65% of the resources be invested in UCITS that meet the asset management company level criteria in (i), (ii) and (iii), and one of the requirements at single UCITS level set out in (i) or (ii) as described above.

The investments of this product, including those of the Separately Managed Account Posta ValorePiù, are also made in accordance with the Responsible Investment Policy and the other 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/gruppo-assicurativo-poste-vita/>.

Proportion of investments

The current investment strategy of the Internal Funds requires that at least 65% of their resources are 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.

Monitoring of environmental or social characteristics

With regard to the Internal Funds, the Company provides periodic monitoring and mechanisms for control, reporting, and discussion. Specifically, at the selection phase, it is verified that the UCITS, potentially subject to investment by the Internal Funds, 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 compliance with the environmental and/or social characteristics promoted by the Internal Funds in relation to its component invested in securities, 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

The monitoring of the environmental and/or social characteristics promoted by the Internal Funds and the related indicators 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 UCITS and on information taken from publicly available sources (e.g. website of the UCITS management company). 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

There are no methodology limitations for the investments of the Internal Funds.

Due diligence

Due diligence activities for the Internal Funds 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/gruppo-assicurativo-poste-vita/>) as mentioned in the product's precontractual documentation. However, engagement policies are not part of the strategy adopted by the investment option to promote environmental and/or social characteristics.

DISCLOSURE	AMENDMENTS	EXPLANATION OF AMENDMENTS
Information pursuant to Art. 10 of Regulation EU 2019/2088	May 2022	First publication
	December 2022	Compliance with the provisions on technical standards under Commission Delegated Regulation EU 2022/1288
	June 2023	Update of the precontractual documentation based on a single investment option disclosure
	March 2024	Annual update of the precontractual documentation
	April 2025	Annual update of the precontractual documentation
	May 2025	Renaming of the internal insurance funds in consideration of the ESMA Guidelines of August 21, 2024, on the use of environmental, social, governance, or sustainability-related terms in fund names
	May 2026	Annual update of the precontractual documentation