

IVALIFE SUSTAINABILITY-RELATED DISCLOSURES (“SFDR”)

This document approved by the Board of IVALIFE Insurance Limited (“IVALIFE”, the “Company”) on 10 August 2023, replaces the previous version published in 21 February 2023.

IVALIFE continues working on developing an Environmental, Social and Governance (“ESG”) framework and considering sustainability in its investment decision-making and advisory processes. The Company adheres to the applicable requirements stated in the Sustainable Finance Disclosure Regulation (SFDR) EU 2019/2088 as follows:

ARTICLE 3 SFDR

IVALIFE has adopted an environmental, social and governance policy (“ESG Policy”) in accordance with the provisions of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (“SFDR”).

IVALIFE does not currently consider the integration of sustainability risks into its investment decision-making and/or insurance advisory processes as being directly relevant to the offering of its insurance-based investment and pension products. The Company has considered the fact that at this point in time there are various restrictions in terms of quality and depth of data that is publicly available. In addition, the Company is still in its initial years of operations and therefore its immediate focus at present is to implement a sound financial, governance and operational framework for the benefit of its policyholders.

ARTICLE 4 SFDR

NO CONSIDERATION OF SUSTAINABILITY ADVERSE IMPACTS STATEMENT

As a Financial Market Participant and Financial Adviser in the context of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector, IVALIFE hereby informs its clients that having commenced its formal business operations as at the 1 March 2021, it does not consider the principal adverse impacts of its investment decisions and/or insurance advice on sustainability factors at this point in time. In the short term, the Company’s immediate focus is to implement a sound financial, governance and operational framework for the benefit of its clientele.

IVALIFE however remains committed to stable and resilient social, environmental, and economic considerations and believes that sustainable investments are central to successful long-term investor outcomes. The Company aims to develop an Environmental, Social and Governance (“ESG”) framework in the medium to long term with the objective of steadily embedding processes which will enable it to allocate ever-increasing importance to ESG issues. The Company shall develop and define criteria to identify, where possible, any activities or industries that should be excluded from its investment decision-making and/or insurance advisory processes.

Currently, the Company does not directly invest in companies or hold securities that are listed in the Norges Bank Exclusion List. Furthermore, it shall continue working on implementing and improving its assessment of adverse impacts of its investments on sustainability factors and undertake efforts to mitigate these impacts in a manner leading to satisfactory sustainable outcomes.

ARTICLE 5 SFDR

In accordance with the provisions of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (“**SFDR**”), IVALIFE Insurance Limited (“**IVALIFE**”), the (“**Company**”) is required to amend its remuneration policy to include information on how this is consistent with the integration of sustainability risks, and to publish and maintain this information on its website.

The Company’s Remuneration Policy stipulates that, in view of the mitigated and, in any case, limited impact, of the variable remuneration for which certain members of its staff are eligible, on the risk profile of the Company, as well as:

- (i) the nature and scale of the Company’s business; and
- (ii) the fact that the Company does not currently consider the integration of sustainability risks in its investment decision-making and/or insurance advisory processes as being directly relevant to the offering of its insurance-based investment products and/or any insurance advice provided in relation thereto,

the Company deems there to be no risk of misalignment of its remuneration procedures with the integration of sustainability risks as set out under the SFDR.