

ENGAGEMENT POLICY UNDER THE SHAREHOLDER RIGHTS DIRECTIVE II

Pursuant to the Shareholders' Rights Directive II (EU 2017/828), IVALIFE Insurance Limited ("IVALIFE" or the "Company") is required to develop an engagement policy describing how it incorporates engagement into its investment strategies.

Alternatively, the Company may publicly disclose, on its website or by way of other means accessible online, a clear and reasoned explanation why it has elected not to do so.

IVALIFE has elected not to develop an engagement policy for the following reasons:

1. The portfolio managers are best placed to act in the best interest of the respective mandates. The exercise of the voting rights is explicitly delegated to the portfolio managers. A different agreement may be reached with each one of the portfolio managers on a case-by-case basis.
2. Investments in listed shares are selected via external, independent and duly qualified portfolio managers who are authorized to manage the respective mandates on a discretionary basis within the applicable investment policies and restrictions set according to the profile and duration of liabilities of the Company. The mandate also takes into consideration the requirements of the Prudent Person Principle as outlined in Article 132 of the Solvency II Directive (2009/138/EC).
3. Decision on whether attending a shareholder meeting or not (and how to cast the relevant vote) remains at the discretion of the portfolio managers.