

# IVALIFE SUSTAINABILITY-RELATED DISCLOSURES (“SFDR”)

This document approved by the Board of IVALIFE Insurance Limited (“IVALIFE”, the “Company”) on 11 June 2025, replaces the previous version published in 10 August 2023.

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. When making investment decisions IVALIFE does not consider the adverse impacts of its decisions on sustainability factors in terms of the SFDR and this applies to both With-Profit Fund and the Unit-Linked Strategies. The Company is aware of these requirements and continues to keep abreast with the developments. However, based on its current strategic assessment, the Company believes that various restrictions exist to fully implement such requirements. 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 available.

## 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.

IVALIFE however remains committed to stable and resilient social, environmental, and economic considerations. Currently, the Company does not directly invest in companies or hold securities that are listed in the Norges Bank Exclusion List.

## 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.