

IVALIFE SUSTAINABILITY-RELATED DISCLOSURES (“SFDR”)

ARTICLE 3 SFDR

“IVALIFE Insurance Limited (“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 products and/or any insurance advice provided in relation thereto.

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 (“SFDR”), IVALIFE Insurance Limited (“IVALIFE”, the “Company”) 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. Rather, IVALIFE’s immediate focus at present is to implement a sound financial, governance and operational framework for the benefit of its clientele”.

This notwithstanding, in the short-term, IVALIFE shall be developing an Environmental, Social and Governance (“ESG”) framework with the objective of steadily embedding processes which will enable it to allocate ever-increasing importance to ESG issues, and this for the purpose of eventually being able to consider (in the medium to long term) the principal adverse impacts of its investment decisions and/or insurance advisory services on sustainability factors. The Company shall also 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 services.

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.”