

GRUPPO POSTE VITA'S RESPONSIBLE INVESTMENT POLICY

Foreword

Poste Vita S.p.A. (the Company) is aware that through the implementation of efficient processes to prevent risks, the insurance sector can help protect society, promote innovation and support economic development, by giving a relevant contribution to the Country's sustainable development.

With the intent of becoming one of the most influencing companies in terms of advocating a culture of social responsibility, the Company adopts a responsible insurance policy (the Policy) that describes the Company's approach in risk management and opportunities related to environmental, social and governance aspects (ESG) within traditional insurance processes. This choice is associated to the principle that evaluating ESG risks and opportunities spurs the design of innovative solutions and contributes to the business management, by providing, at the same time, a specific solution to all social and environmental needs voiced by the community.

The adoption of the current Policy is in line with the Poste Italiane Group's Sustainability Plan and it confirms its commitment to integrate ESG topics in its own strategy with specific reference to the insurance sector.

Objectives

Through the Policy the Company aims at:

- defining its own principles that allow Gruppo Assicurativo Poste Vita to include ESG-related subjects in its own activity management, by taking into account every single operation's peculiarity;
- giving a positive input to economic, social and environmental impacts by issuers of assets within the financial portfolios and their fund managers, with the intention of fulfilling investors' expectations;
- communicating to all stakeholders, amongst which staff, companies, the financial community and institutions its own vision of social responsibility towards economic, social and environmental risks generated by clients the Company insures;
- adhering correctly to the principles and guidelines that are implemented on a national and international level for the integration of sustainability criteria in traditional insurance processes.

General Principles

The Company regards indispensable to observe principles and standards which are shared on an international scale, and that are considered guidelines for the definition of its approach as a responsible insurer. By doing so, the Company can take part in important initiatives on the topic related to ESG integration criteria that offer an important opportunity for dialogue and sharing the best practices implemented by the sector's leading financial and insurance parties.

Specifically, the Policy is founded on Principles for Sustainable Insurance (PSI), six principles promoted by the United Nations, that indicate the main actions to carry out for an investor and offer specific tools aimed at integrating ESG factors within traditional investment policies.

ESG evaluation

The Company's responsible investment policy is based on an evaluation activity that is performed on all investment operations by accounting also the environmental, social and governance profiles of all asset issuers that are in the financial portfolios - be them "corporate" or "governmental" - and their respective fund managers. In particular:

- for "corporate" issuers, the sustainability profile is defined by analysing management criteria and performances in consideration of factors connected to the environment, clients, suppliers, human rights, human resources, local communities and corporate governance;
- for "governmental" issuers, the sustainability profile is defined by analysing commitments and results in connection with the environment, civil society and solidarity, governance and institutions.

All the above analyses are carried out by considering the issuers' compliance levels with universally recognised rules and standards that are issued by international bodies amongst which the United Nations, the International Labour Organisation and the OECD. To this point, the Company does not consider any investments with those producing weapons that are banned by the UN Convention¹ that violate the fundamental humanitarian principles (landmines, cluster bombs, depleted uranium, biological weapons, chemical weapons, undetectable shrapnel weapons, blinding lasers, incendiary and white phosphorus weapons).

All evaluation related to the ESG profiles of the Company's investments are performed by a managerial committee denominated *Investment Committee – ESG Evaluation* ("Comitato Investimenti – Valutazioni ESG"). The process is based on information and data that are processed internally and provided by external specialized suppliers (info-providers). Notably, the company's Investment Committee has a section called "ESG Evaluation" that owns the responsibility to examine and evaluate periodically all criteria used to define ESG profiles and update a list of investment issuers that are to be left out.

In order to make the implemented ESG evaluation process efficient, and ensure that all its criteria are met, the Company applies controls of second and third level that are formalized within the corporate procedures.

The company has defined a responsible approach also for investments that are managed by third parties, amongst which those made in the Real Estate sector ("Indirect Investments").

As far as indirect investors are concerned, the Company is committed to transmit its Policy to third party fund managers so that they consider the same principles or use them as a starting point to develop their own.

Namely, as far as the evaluation of Indirect Investments in the Real Estate sector is concerned, the Company considers amongst other things the level of compliance exhibited by fund managers in relation to environmental requirements. With this approach, the Company aims at anticipating the future and even more stringent legislation conditions on the environmental impact, by promoting also energetic efficiency.

¹ Biological weapons as per BWC Convention in 1970; chemical weapons as per OPWC Convention in 1993; cluster bombs as per Oslo Convention in 2008; landmines as per Ottawa Convention in 1997; undetectable shrapnel weapons lasers, incendiary and white phosphorous incendiary weapons, as per the relative Convention in 1983; depleted uranium as per the UN General Assembly Resolution in 2010.

ESG monitoring

The Investment Committee – ESG Evaluation carries out a monitoring activity aimed at analysing the ESG evolving profiles of issuers, and their fund managers, that are in the Company's financial portfolios. The activity consists of a regular update of all ESG profiles produced by info-providers and, when needed, more in-depth analyses that can be developed through targeted research, case studies and exchanges with issuers (engagement). The engagement activities can require meetings with issuers' management, communication for social bodies or exchange pools with other institutional investors.

Through the implementation of principles and processes adopted, the Company aims at creating an ESG global profile on its own investments that is amongst the best in class on the market, according to the evaluation performed by external info-providers that are internationally known and specialized in this type of analyses.

Responsible investments

The Company is committed to investing in sectors that contribute to sustainable development objectives on a global scale, like Sustainable Development Goals ("SDGs") defined by the United Nations. Amongst these, the company deems important to focus on bond investments that can be labelled as "Green", "Social", and "Sustainable" in line with the standards and principles set by the International Capital Market Association (ICMA).

Reporting

The Company is committed to communicating and publish on its website, at least on a yearly basis, how the principles of the Policy are implemented on a practical level.

Dissemination and Update

The Policy is communicated to all the staff, also by organizing specific and dedicated training sessions depending on the operational activities, roles and responsibilities. It is made available to all policyholders through the Company's website, including the insurance market, the financial community, and institutions.

The Company's managers have the duty to integrate all criteria defined in the Policy in the business decision-making processes and its operations.

In order to ensure the Policy is updated, it will be assessed at least once a year in consideration of all highlights reported as a result of the national and international monitoring activities regarding responsible insurance.