

ESG policy – Sustainable Finance

KB as a Financial Advisor on Komerční pojišťovna (KP) product.

I) INTEGRATION OF SUSTAINABILITY RISK IN INVESTMENT DECISION PROCESS (PROSPECTUS)

KB has access to KP ESG methodology to take into account sustainability risks in its investment advice.

KP, as a financial market participant believe that the integration of factors such as environmental protection, social impacts and corporate governance into the investment process is important to achieve desirable financial returns and social value.

Sustainability risks do not fall on a guaranteed fund where appreciation is guaranteed. For other funds, the materialisation of these risks may, in an extreme case, result in lower or negative returns. In the future, they also plan to assess sustainability risks for individual life insurance investment funds through a comprehensive set of questions for fund managers. As part of the advice, they assess your attitude to investment risk through general questions about investment preferences. Accordingly, they select an investment strategy with a general risk assessment. they do not consider for the moment sustainability risks as a separate category and an assessment of these risks is not included in the advice at this time.

A) INCORPORATING SUSTAINABILITY RISKS INTO INVESTMENT DECISIONS AND THEIR IMPACT ON INVESTMENT RETURNS WITHIN INSURANCE PRODUCT

As part of the policies associated with Solvency 2 regulation, investment policy also includes an aspect relating to environmental and social risk management. The Commercial Insurance Company pays particular attention to issues relating to socially responsible investment.

The commercial insurance company applies ESG criteria to guide the selection of securities, their holding in the portfolio or their disposal. With regard to the principle of prudent behaviour, the Commercial Insurance Company's investment process places great emphasis on an individual approach to investment selection in cooperation with specialists from Amundi and the Société Générale Group, which also uses the relevant ESG rating of the issuer.

As part of its investments in bonds and direct equity investments, Commercial Insurance applies the recommendations of the SG Group and does not allow investments in the following sectors:

- Tobacco (all issuers that produce tobacco and have at least 10% of their revenues derived from the distribution, supply and licensing of tobacco products),
- Defence: companies engaged in the production of banned or controversial weapons
- Coal: companies active in coal mining, and energy companies where more than 30% of their electricity generation comes from coal.

The portfolio monitoring process and its quality includes not only a regular portfolio assessment review, which consists of regular monitoring of the rating of individual issuers and monitoring of factors that could lead to impairment, but also the quality of the portfolio in terms of ESG criteria (monitoring of the ESG rating of individual issuers).

At this point in time, sustainability risks are not taken into account when selecting investment funds for life insurance investments. This applies to the client's chosen investment strategy, including the selection of individual funds.

B) INCORPORATION OF SUSTAINABILITY RISKS INTO INVESTMENT ADVICE PROVIDED BY KOMERČNÍ BANKA

Investment advice is provided to clients by Komerční banka. Commercial Bank does not currently systematically assess the adverse impact of investments on sustainability decisions on sustainability factors to the extent required by the current draft of the Regulatory Technical Standards ("RTS", not applicable from 10 March 2021).

Commercial Bank's investment advice takes into account Amundi's selection of investment funds in accordance with Regulation (EU) 2019/2088 ("SFDR") to meet the objective of offering primarily funds that meet sustainability criteria ("ESG" or "green" funds). The range of investment funds meeting these criteria will be expanded alongside Amundi's expanding offering, which aims to apply ESG criteria to the entire range of investment funds by the end of 2021.

For more information visit www.kb.cz/SFDR and <https://www.amundi-kb.cz/investicni-reseni/odpovedne-investovani>

The products currently on offer were generally developed before the SFDR came into force and were not in all cases designed to take sustainability risks into account

Analysing these results, KB ensures that partners whose products are the subject of investment advice comply with regulatory obligations but also with the commitments made by the Societe Generale Group in terms of sustainability.

II) ADVERSE SUSTAINABILITY IMPACT

New Sustainable Finance Disclosure Regulation (SFDR) came into effect on March 10th, 2021. The aim of the SFDR is to provide you, as an investor, with the information how Komerční banka, a.s. (“KB”), taking due account of its size, the nature and scale of its activities and the types of financial products it makes available, considers principal adverse impacts of investment decisions on sustainability factors. KB describes in its policies published on www.kb.cz how it integrates in its internal processes, the procedures for considering the principal adverse impacts alongside the relevant financial risks and relevant sustainability risks. The sustainability risks mean an environmental, social or governance event or condition that, if it occurs, could cause a negative material impact on the value of the investment, as specified in specific sectoral legislation. Sustainability Risks can either represent a risk on their own or have an impact on other risks and may contribute significantly to such risks, such as (but not limited to) market risks, operational risks, liquidity risks or counterparty risks. Sustainability risks are linked but not limited to climate-related events resulting from climate change (physical risks) or to the society’s response to climate change (transition risks), which may result in unanticipated losses that could affect the relevant investments. Social events (e.g. inequality, inclusiveness, labour relations, investment in human capital, accident prevention, changing customer behaviour, etc.) or governance shortcomings (e.g. recurrent significant breach of international agreements, bribery issues, products quality and safety, selling practices, etc.) may also translate into Sustainability Risks. Except the general information required by SFDR and published on KB website, KB will fulfill in the pre-contractual information for each relevant financial product or service under SFDR the information duty. Although the Regulatory Technical Standards under SFDR are not yet approved by the European institutions, KB is still able to provide you with the high-level information about sustainability factors and risks under SFDR. Following the approval of the RTS, the information related to sustainability published on our website or provided in the pre-contractual documentation will be continuously updated.

We would like to inform the clients that KB considers principal adverse impacts of KP products its advise on regarding sustainability factors under SFDR.

The aim of the present statement is to explain how the information contained in the Principal Adverse Impact Statement sent by KP a Financial Market Participant is used to select the product that KB advise on.

KB advisors, when selecting the products, refers to the “description of sustainability impact” part of the Principal Adverse Statement Impact sent by KP and advise its client by ranking them according to their adverse impact on factors such as Greenhouse gas emissions, biodiversity impact and water emission.

Consideration of adverse sustainability impact within investment based insurance products

Komerční banka is aware of the attractiveness of investments that meet sustainability criteria and its role as an investment advisor. To enable clients to make all their decisions in an informed way, Komerční banka ensures that clients have all the information they need to assess sustainability risks before making an investment decision. For this purpose, Komerční banka works closely with the Amundi Group and the Société Générale Group to ensure that clients receive the pre-contractual information necessary for the correct information on sustainability criteria.

The products currently offered were generally developed before the entry into force of the SFDR and were not in all cases designed to take into account sustainability risks.