



# Statement on the material adverse sustainability impacts of investment decisions.

Financial market participant Powszechny Zakład Ubezpieczeń na Życie Spółka Akcyjna (PZU Życie SA)

LEI 549300TNSHGVU2UXO005

#### **Executive Summary**

PZU Życie SA considers the material adverse sustainability impacts of its investment decisions. This statement is a consolidated statement on the material adverse sustainability impacts resulting from PZU Życie SA's activities and covers the reference period from 1 January 2022 to 31 December 2022.

In its insurance operations, PZU Życie SA offers insurance-based investment products. These comprise endowment insurance and unit-linked life insurance products. of diverse asset structures.

The due diligence strategy in respect of the impacts takes into account the types of investment products offered by PZU Życie SA.

#### **Endowment Insurance**

PZU Życie SA takes investment decisions in respect of investing funds to cover insurance liabilities arising from endowment insurance policies. These funds are invested in debt securities issued, backed or guaranteed by the State Treasury of the Republic of Poland.

PZU Życie SA considers the material adverse sustainability impacts of its investment decisions, except that the investment decisions are taken within the framework of an investment strategy which envisages investment in debt securities issued, backed or guaranteed by the State Treasury of the Republic of Poland.

### **Unit-Linked Life Insurance**

Unit-linked insurance funds are invested in financial instruments issued by corporate issuers (e.g. equities or corporate bonds) or by sovereigns (countries) and international organizations (e.g. treasury bonds), or else in participation units and titles of collective investment undertakings.

As regards unit-linked life insurance whereby funds are invested in participation units or titles of dedicated collective investment undertakings, PZU Życie SA takes into account whether a given investment fund pursues a sustainable investments policy or promotes environmental or social aspects. Furthermore, PZU Życie SA considers whether the investment fund management company in charge of a fund takes into account the material adverse impacts of its investment decisions in respect of sustainability and whether it discloses their scope in compliance with the Delegated Regulation. Being guided by the wording of the contracts of insurance as well as the policyholder's and the insured's interests, PZU Życie SA considers the above mentioned information when taking decisions on the selection of the investment funds in whose participation units the assets made available under the unit-linked life insurance contract will be invested, including other criteria of investment fund evaluation.

<sup>1</sup> Pursuant to the SFDR, adverse sustainability impacts shall be understood as effects of investment decisions which have negative influence on aspects of sustainable development, i.e. the environmental, social and employee issues, issues related to the respect for human rights as well as combating of

# corruption and bribery.

Powszechny Zakład Ubezpieczeń na Życie Spółka Akcyjna, District Court for the Capital City of Warsaw, 13th Commercial Division, KRS 30211, NIP 527-020-60-56, share capital: PLN 295,000,000, paid up in full, Rondo Ignacego Daszyńskiego 4, 00-843 Warsaw, pzu.pl, hotline: 801 102 102 (charges as per the operator's rates)

PZU Życie SA outsourced to TFI PZU SA the management of unit-linked life insurance funds whose assets are invested in equities or bonds, or else into the

participation units or titles of various investment funds (the so-called model funds). Being guided by the wording of the contracts of insurance, the policyholder's and the insured's interests, as well as considering the products' investment objectives, rules of asset investment diversification and other investment restrictions, the investment selection criteria and the adopted benchmarks and reference rates arising from the law, PZU Życie SA committed TFI PZU SA that when managing the portfolios of these unit-linked funds the company take into account the material adverse sustainability impacts only when it does not negatively impact the expected rate of return on the product as well as the relation of the expected profit to the value of risk, except that the possibility to take into account the material adverse sustainability impacts of investment decisions is limited or excluded in respect of products with defined investment policy.

In the contract of insurance concluded with the unit-linked fund, the policyholder selects the unit-linked funds in which they wish to invest the funds from their insurance premium.

Furthermore, PZU Życie SA publishes the material adverse sustainability impacts in quantitative terms, so that the information is based on Annex I of the Delegated Regulation. This information is published below.

PZU Życie SA notes that the companies in which the funds have been invested are not required to prepare and publish data on the indicators of adverse sustainability impacts. Some of these companies publish such information on a voluntary basis. For some indicators, more companies in which the assets have been invested publish such data, whereas for other indicators there are very few companies that publish such data. PZU Życie SA has not performed any data estimates in respect of the indicators for the companies that do not publish the data, because such estimates would not be reliable and could be misleading for customers. In section "Description of the strategy of identification and hierarchy ranking of the material adverse sustainability impacts", point (e) "data sources used" in the table column "Data coverage", it is indicated what percentage of the investment portfolio accounts for companies that have published a given indicator. Customers should be aware that for some indicators this percentage is very low, which means that the data published does not reliably reflect the material adverse sustainability impacts of PZU Życie SA's operations.

<sup>&</sup>lt;sup>2</sup> Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022, which supplements Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of 'do no significant harm', specifying the contents, methods and the form of presentation of the information in respect of sustainability indicators

and adverse sustainability impacts, as well as specifying the contents, and the form of presentation of the information in respect of promoting the

environmental or social aspects as well as sustainable investment objectives in the documents made available prior to the conclusion of the agreement, on Internet websites and in interim reports.

Powszechny Zakład Ubezpieczeń na Życie Spółka Akcyjna, District Court for the Capital City of Warsaw, 13th Commercial Division, KRS 30211, NIP 527-020-60-56, share capital: PLN 295,000,000, paid up in full, Rondo Ignacego Daszyńskiego 4, 00-843 Warsaw, pzu.pl, hotline: 801 102 102 (charges as per the operator's rates) 2/16

# Description of the material adverse sustainability impacts

Indicators appli	Indicators applicable to investments in investee companies								
Adverse sustainabil	ity impact indicator	Metric	Impact [Year 2022]	Impact [Year 2021]3	Explanation	Measures taken, measures planned and objectives defined for the next reference period			
Indicators in respec	ct of climate impacts and other er	nvironmental indicators							
		Scope 1 greenhouse gas emissions	147.96	Not applicable	Not applicable				
	Gas emissions	Scope 2 greenhouse gas emissions	16.75	Not applicable	Not applicable	Being guided by the wording of insurance contracts, PZU Życie SA the policyholder's and the insured's interest, and considering			
	greenhouse	Scope 3 greenhouse gas emissions	581.49	Not applicable	Not applicable	the investment objectives of financial products, principles of investments diversification and other investment restrictions, the			
		Total greenhouse gas emissions	745.85	Not applicable	Not applicable	of investment selection as well as the adopted benchmarks and reference rates arising from the law, when managing portfolios of financial products takes into account the material adverse			
	2. Carbon footprint	Carbon footprint	591.07	Not applicable	Not applicable	impacts of investment decisions on sustainability only if it does not have a negative influence on			
	3. Intensity of greenhouse gas emissions in investee companies	Intensity of greenhouse gas emissions in investee companies	88.08	Not applicable	Not applicable	the expected rate of return on the product for the policyholder and on the relation of expected profit to the value of risk, and except that the possibility to consider the material adverse sustainability impacts of investment decisions is either limited or excluded			
Gas emissions greenhouse	Exposure to enterprises operating in the fossil fuel sector	Share of investments made in enterprises operating in the fossil fuel sector	3.56%	Not applicable	Not applicable	in respect of products with defined investment policy.  The PZU Życie SA's contracts of insurance currently in force do not envisage the objective of mitigating the material			
	5. Share of energy used and generated from non-renewable sources	Share of energy from non-renewable sources used and generated by the investee companies, relative to energy resources from renewable sources, expressed as a percentage of the total energy	Consumption 4.26% Production 0.56%	Not applicable	Not applicable	adverse impacts of investments. PZU Życie SA does not exclude that in the future the objective of mitigating the material adverse sustainability impacts of investment decisions will be introduced for selected financial products. For such products, the adverse impacts will include both the description of the adverse impacts as well as the procedures introduced in order to mitigate their effects. Furthermore, PZU Życie SA discloses			
	6. Energy consumption intensity per given sector with significant climate impacts	Energy consumption in GWh per each one EUR million generated as investee companies revenue attributable to a given sector with significant climate impacts	0.07	Not applicable	Not applicable	the main adverse impacts of investments.  2. PZU Życie SA has adopted the "Policy of PZU Życie SA's Listed in the Regulated Market". Its is described in section "Engagement Policy".			

<sup>3</sup> The Delegated Regulation entered into force on 1 January 2023. Data for 2021 is not available.

Biodiversity	7. Activities resulting in adverse impacts on biodiversity sensitive areas	Share of investmentsmade in companies operating facilities/activities in biodiversity sensitive areas or in the vicinity of such areas if the operation of such companies has an adverse impact on these areas	0.00	Not applicable	Not applicable	
Water	8. Emissions into water	Tons of emissions into water generated by investee companies per each one EUR million invested; the indicator expressed as a weighted average	0.11	Not applicable	Not applicable	
Wastes	9. Indicator of hazardous waste and radioactive waste	Tons of hazardous waste and radioactive waste generated by investee companies, per each one EUR million invested; the indicator expressed as a weighted average	5.86	Not applicable	Not applicable	
Indicators in respec	t of social and employee issues, I	respect for human rights and combating co	rruption and bribery			
	10. Violations of the principles of the Global Compact initiative and the Organization for Economic Cooperation and Development (OECD) Guidelines for	Share of investments made in companies that violated or continue to violate of the Global Compact initiative or the OECD Guidelines for Multinational Enterprises	3.64%	Not applicable	Not applicable	1. Being guided by the wording of the contracts of insurance, the policyholder's and the insured's interests, as well as considering the investment objectives of financial products, the principles of investments diversification and other investment restrictions, the investment selection criteria and the adopted benchmarks and reference rates arising from the law, when managing portfolios
Social and Employee Issues	11. No processes or mechanisms to monitor compliance with Global Compact principles and the OECD Guidelines for Multinational Enterprises	Share of investments made in companies that do not have a strategy of monitoring compliance with the Global Compact principles or the OECD Guidelines for Multinational Enterprises, nor any grievance/complaints handling mechanisms regarding breaches of the Global Compact principles or the OECD Guidelines for Multinational	15.00%	Not applicable	Not applicable	of financial products PZU takes into account the material adverse sustainability impacts of investment decisions only if it does not have a negative influence on the expected rate of return on the product for the policyholder and on the relation of expected profit to the value of risk, and except that the possibility to consider the material adverse sustainability impacts of investment decisions is either limited or excluded in respect of products with defined investment policy.  At present, PZU Życie SA's contracts of insurance currently in
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap in investee companies	14.18%	Not applicable	Not applicable	force do not envisage the objective of mitigating the material adverse impacts of investments. PZU Życie SA does not exclude that in the future the objective of mitigating the material adverse sustainability impacts of investment decisions will be introduced for selected financial products. For such products, the description of

	13. Board gender diversity  14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons, and biological weapons).	Average ratio of female to male board members in investee companies, expressed as a percentage of the total number of board members  Share of investments in investee companies involved in the manufacture or selling of controversial weapons	29.92%	Not applicable  Not applicable	Not applicable  Not applicable	the adverse impacts will comprise both a description of the adverse impacts as well as the procedures introduced in order to mitigate their effects. Furthermore, PZU Życie SA discloses these material adverse impacts of investments.  2. PZU Życie SA has adopted the "Policy of PZU Życie SA's Emgagement in Companies Listed in the Regulated Market". It is described in section "Engagement Policy".	
Indicators applicab	e to investments in treasury bon	ds and bonds issued super-nationally			1		
Environmental Issues	15. Intensity of greenhouse gas emissions	Intensity of greenhouse gas emissions for bond investee countries	294.9	Not applicable	Not applicable	Being guided by the wording of the contracts of insurance, the policyholder's and the insured's interests, as well as considering the investment objectives of financial products, the principles of investments diversification and other investment restrictions,	
Social Issues	16. Bond investee countries with a record of violations in respect of social issues	The number of bond investee countries with a record of breaches in respect of social issues (in absolute terms and indirectly, as a percentage of all the countries in whose bonds investment has been made), named in international treaties and conventions, UN principles as well as - in the relevant cases - in national law	6	Not applicable	Not applicable	the investment selection criteria and the adopted benchmarks and reference rates arising from the law, when managing portfolios of financial products PZU Życie SA takes into account the main adverse impacts of investment decisions for sustainability factors only if it does not have a negative influence on the expected rate of return on the product for the policyholder and on the relation of expected profit to the value of risk, and except that the possibility to consider the material adverse sustainability impacts of investment decisions is either limited or excluded in respect of products with defined investment policy.  At present, PZU Życie SA's contracts of insurance currently in force do not envisage the objective of mitigating the material adverse impacts of investments. PZU Życie SA does not exclude that in the future the objective of mitigating the material adverse sustainability impacts of investment decisions will be introduced for selected financial products. For such products, the description of adverse impacts will comprise both a description of the adverse impacts as well as the procedures introduced in order to mitigate their effects. Furthermore, PZU Życie SA discloses these material adverse impacts of investments.	
Indicators Applicab	le to Investments in Property						
Fossil Fuel	17. Fossil fuels			Not applicable. Assets of PZU Życie SA's financial products are not invested in property.			

		storage, transport or production of fossil fuels	
Energy Efficiency	18. Exposure to energy-inefficient property	Share of investments in energy- inefficient property	Not applicable. Assets of PZU Życie SA's financial products are not invested in property.

# Additional climate-related indicators and other environmental indicators

Climata ro	lated indi	cators and a	thar anvironment	al indicators

### Indicators applicable to investments in treasury bonds and bonds issued super-nationally

	indicators applicable to investments in treasury bonds and bonds issued super-nationally							
,	Adverse sustainability indicator		Metric	Impact [year n]	Impact [year n-1]	Explanation	Measures taken, measures planned and objectives defined for the next reference period	
Gı	reen securities	17. Share of bonds not issued based on the EU regulations in respect of bonds sustainable environmentally	Share of bonds not issued based on the EU regulations in respect of bonds sustainable environmentally	100%	Not applicable	Not applicable	Explanation is given in the table with a description of the indicators applicable to investments in investee companies and the indicators applicable to investments in treasury bonds and bonds issued supernationally.	

Additional indicators in respect of social and employee issues, respect forhuman rights and combating corruption and bribery

# Indicators in respect of social and employee issues, respect for human rights and combating corruption and bribery

Indicators applicable to investments in treasury bonds and bonds issued super-nationally

Adverse sustainability indicator		Metric	Impact [year n]	Impact [year n-1]	Explanation	Measures taken, measures planned and objectives defined for the next reference period
Governance	22. Governance non- cooperative	Investments in jurisdictions listed in the EU's list of jurisdictions non-cooperative for tax purposes. <sup>4</sup>		Not applicable	Not applicable	Explanation is given in the table with a description of the indicators applicable to investments in investee companies and the indicators applicable to investments in treasury bonds and bonds issued supernationally.

#### Other indicators

Not applicable. PZU Życie SA does not apply adverse sustainability impacts in order to identify and evaluate additional material adverse impacts for a given sustainability factor other than those given in the tables above.

<sup>4</sup> List of non-cooperative tax jurisdictions: <a href="https://www.consilium.europa.eu/en/policies/eu-list-of-non-cooperative-jurisdictions/">https://www.consilium.europa.eu/en/policies/eu-list-of-non-cooperative-jurisdictions/</a>

#### Description of the strategy of identification and hierarchy ranking of material sustainability impacts

When taking investment decisions in respect of investing funds covering endowment insurance liabilities, PZU Życie SA applies an ESG criteria-based scoring methodology applicable to the instruments in which the assets under management are invested or to issuers of such instruments.

PZU Życie SA has committed TFI PZU SA that when managing the assets of unit-linked insurance funds the company applies an ESG criteria-based scoring methodology applicable to the instruments in which the assets under management are invested or to issuers of such instruments.

Various methodologies apply respectively to the individual types of financial instruments discussed below.

**For corporate issuers**, in whose shares or corporate bonds the funds are invested, universally available environmental, social and governance indicators are used. These indicators include greenhouse gas emissions, equal opportunities policy, supervisory board members meeting the criteria

of independence, etc. An appropriate weight is applied to each respective indicator. If a specified number of indicators are not available for a given issuer, an average is used of the available scorings assigned by external specialized agencies.

**For sovereign issuers and international organizations**, in whose debt securities the funds are invested, universally available environmental, social and governance indicators are used, as published, *inter alia*, by selected international organizations. These indicators include an environmental protection assessment, a sensitivity to climate change evaluation, indicators of social development, evaluation of the frequency of corruption incidents, etc. An appropriate weight is applied to each respective indicator.

Each issuer is assigned an internal scoring which reflects the sustainability effects of the issuer's activity, including the material sustainability impacts and indicators.

Derivatives contracts are not evaluated for their sustainability impacts.

For investment funds whose participation units or titles are purchased into life insurance unit-linked funds, it is considered whether a given fund pursues a sustainable investments policy or promotes environmental or social aspects. Furthermore it is considered if the investment fund management company takes into account the material sustainability impacts of their investment decisions and whether its discloses their scope in compliance with the Delegated Regulation.

As has been mentioned above, guided by the wording of the contracts of insurance, the policyholder's and the insured's interests, as well as considering the investment objectives of financial products, the principles of investments diversification and other investment restrictions, the investment selection criteria and the adopted benchmarks and reference rates arising from the law, when managing portfolios of financial products PZU Życie SA takes into account the material sustainability impacts of investment decisions only if it does not have a negative influence on the expected rate of return on the product for the policyholder and on the relation of expected profit to the value of risk, except that the possibility to consider the material adverse sustainability impacts of investment decisions is either limited or excluded in respect of products with defined investment policy.

At present, PZU Życie SA's contracts of insurance currently in force do not envisage the objective of mitigating the material adverse impacts of investments. PZU Życie SA does not exclude that in the future the objective of mitigating the material adverse sustainability impacts of investment decisions will be introduced for selected financial products. For such products, the description of adverse impacts will comprise both a description of the adverse impacts as well as of the procedures introduced in order to mitigate their effects. Furthermore, PZU Życie SA discloses these material adverse impacts of investments.

As a result, PZU Życie SA has not developed a strategy of identification and hierarchy ranking of material adverse sustainability impacts for investment products offered by PZU Życie SA

- a) date of the strategies' approval by the financial market participant's governance body Not applicable.
- b) division of responsibility for the implementation of these strategies in organizational strategies and procedures Not applicable.

c) methods of selecting the indicators referred to in Article 6 sec. 1(a), (b) and (c), as well as the identification and evaluation of the material adverse impacts referred to in Article 6 sec. 1, and in particular an explanation of how these methods take into account the likelihood and severity of such material adverse impacts, including their potentially irreversible character

The indicators referred to in Article. 6 sec. 1(a) of the Delegated Regulation are the indicators given in Table 2 of Annex I to the Delegated Regulation. These are additional climate-related indicators and other environmental indicators.

Among these indicators, PZU Życie SA, using the expert method on the basis of the arguments presented below, has chosen indicator no. 17

"Share of bonds not issued based on the EU regulations on environmentally sustainable bonds". PZU Życie SA believes that it is an unambiguous indicator, because such bonds can be identified in unequivocal and undisputed manner. Furthermore, the indicator covers important aspects given the impact of green securities on sustainability. Therefore, it represents important information weight for the Subfund investors. In addition, it is a comprehensive indicator, rather than one focusing on one section of activities only, and the data for its publication is easily available.

The indicators referred to in Article. 6 sec. 1(a) of the Delegated Regulation are the indicators given in Table 3 of Annex I to the Delegated Regulation. These are additional indicators in respect of social and employee matters, respect for human rights and combating corruption and bribery.

Among these indicators, PZU Życie SA, using the expert method on the basis of the arguments presented below, has chosen indicator no. 22. "Investments in jurisdictions listed in the EU's list of non-cooperative tax jurisdictions".

PZU Życie SA believes that this indicator in unambiguous, because investments in such jurisdictions can be identified in unequivocal and undisputed manner. Furthermore, the indicator covers important aspects given the very negative impact of investments in such jurisdictions. Therefore, it represents important information weight for the Subfund investors. In addition, it is a comprehensive indicator, rather than one focusing on one section of activities only, and the data for its publication is easily available.

The indicators referred to in Article. 6 sec. 1(c) of the Delegated Regulation are potential other indicators. As mentioned above, PZU Życie SA does not apply other adverse sustainability impacts

in order to identify and assess additional material adverse impacts for a given sustainability factor.

 each margin of error linked to application of the methods referred to in this section in letter (c), including an explanation of the margin of error Not applicable.

#### e) data sources used

The unit-linked insurance funds are invested, among others, in participation units and titles of investment funds. To calculate the indicators of adverse impacts on sustainability for individual investee companies, PZU Życie SA has used the look-through criterion, i.e. it considered companies in investment funds' portfolios proportionately to the value of the unit-linked fund investment into a given investment fund.

PZU Życie SA notes that having applied the look-through criterion, as a financial market participant it displayed exposure to a large number of investee issuers, whereas for some issuers the share of instruments issued by the issuer in the financial products offered by PZU Życie SA (measured with the look-through criterion)

was very low. PZU Życie SA assumed that the effect of adverse sustainability impacts for such issuers on the value of indicators describing the material adverse sustainability impacts resulting from the activities of PZU Życie SA is insignificant and decided that it will not consider indicators applicable to the issuers in which PZU Życie SA's investment is below PLN 1 million (in terms of the look-through criterion). This cut-off point has been selected with the expert method, also taking into account the costs of obtaining market data. Upon application of this cut-off point, issuers whose indicators were considered account on average per annum for 94.12% of PZU Życie SA's financial product assets, whereas the indicators for companies accounting for the remaining 5.88% of PZU Życie SA's financial product assets have been disregarded.

Furthermore assets of unit-linked funds invested in the participation titles of the investment funds managed by BlackRock have been disregarded. This was due to the fact that BlackRock did not provide the composition of the investment funds under their management for the purposes of these disclosures by PZU Życie SA.

In the table below, for each indicator of adverse sustainability impacts the table gives the data source, a commentary as well as the information on what percentage of the financial product portfolio is companies that have disclosed a given indicator (in terms of the look-through criterion).

Adverse sustainability impact indicator	Data source	Comments	Metric	Data coverage
Indicators applicable to investmen	nts in investee companies			
1. Greenhouse gas emissions	Bloomberg	For each investee company, the share of the current value of the investments in the company's enterprise value is calculated6, which is multiplied by the company's greenhouse gas emissions - in this way we compute the exposure of the financial product to the greenhouse gas emissions of a given company. In the next step, the exposure to all investee companies is summed up - in this way we compute the greenhouse gas emissions attributable to the financial market participant. It is higher for financial market participants holding more assets, and lower for financial market participants holding less assets.	The indicator is expressed in thousands of megatons of carbon dioxide (CO2).	Scope 1 greenhouse gas emissions: 72.74%  Scope 2 greenhouse gas emissions: 72.74%  Scope 3 greenhouse gas emissions: 57.86%  Total greenhouse gas emissions: 57.86%
2. Carbon footprint	Bloomberg	The greenhouse gas emissions attributable to a financial market participants is calculated (in the manner described above for indicator 1 "Greenhouse gas emissions"), which is then divided by the current value of all investments. It is comparable for financial market participants	The indicator is expressed in tons of CO2 per one EUR million of investment value (assets).	72.94%
3. Intensity of greenhouse gas emissions of investee companies	Bloomberg share of investment in a given	The current value of investment into a given company is divided by the current value of all investments - in this way we compute the share of investment in a given company in the total value of all investments (assets) of the financial product. In the next step, for each investee company we divide its greenhouse gas emissions by its revenue in EUR million - in this way we compute the intensity of the company's greenhouse gas emissions. Then, the company in the value of all investments is multiplied by the intensity of the company's greenhouse gas emissions - in this way we compute the exposure of a financial market participant to the intensity of greenhouse gas emissions of a given company. In the next step, the exposure	The indicator is expressed in tons of CO2 per one EUR million of the investee companies' revenues.	96.80%

<sup>5</sup> The term "current value of investment" means the value of investment, expressed in EUR, made by a financial market participant in the investee company. The basis computed for the calculation of the "current value of investment" is consistent with the definition of "enterprise value" (question I.1 in position JC 2022 62)

The term "enterprise value" means the sum of market capitalization calculated as of the end of the fiscal year for ordinary shares, market capitalization for privileged shares and the carrying amount of the total indebtedness and non-controlling interests, without deducting cash and cash equivalents

<sup>7</sup>The term "current value of all investments" means the value, expressed in EUR, of all investments for a given financial product. The term "all investments" should be understood as both direct as well as indirect investments funding the investee companies or sovereigns, through funds, funds of funds, bonds, equity instruments, derivative instruments, loans, deposits, cash and any other securities or financial contracts (question I.2 in position JC 2022 62)

		greenhouse gas emissions attributable to a financial market participants. It is comparable for financial market participants holding various assets.		
4. Exposure to enterprises of the fossil fuel sector	Bloomberg	The current value of investment in (i) enterprises that generate any kind of revenues from exploration, mining, distribution or refining of hard coal and lignite; (ii) enterprises that generate any kind of revenues from exploration, mining, distribution or refining of liquid fossil fuels; and (iii) enterprises that generate any kind of revenues from exploration and mining of gas fossil fuels or their dedicated distribution, is divided by the current value of all investments. The indicator is comparable for financial market participants holding various assets.	The indicator is expressed as a percentage of the investment value (assets).	83.90%
5. Share of energy consumed and generated from non-renewable sources	Bloomberg	The share of energy from non-renewable sources consumed and the share of energy from non-renewable sources generated by investee companies are presented separately. Share of energy from non-renewable sources used and generated by the investee companies, relative to the energy resources from renewable sources, expressed as a percentage of total energy resources, is computed by the way of dividing the current value of investment in a given company, multiplied by the share (percentage) of energy from non-renewable sources used or generated by the company in the total energy resources, by the current value of all investments. For example, the share (percentage) of energy from non-renewable sources used by a company which represents 1% of the current value of all investments (assets) accounts for two times lower a final share in the financial product than the share (percentage) of energy from non-renewable sources used by a company which represents 2% of the current value of all investments (assets). The indicator is comparable for financial market participants holding various assets.	The indicator is expressed in percentage share of energy from non-renewable sources in the total energy resources.	Consumption 20.23% Production 2.51%
6. Energy consumption intensity per given sector with significant climate impacts	Bloomberg	Energy consumption (in GWh) per each one EUR million of the investee company's revenue is multiplied by the ratio of the current value of investment in this company and the current value of all investments. In the next step, the indicators for all investee companies are summed up. For example, the consumption of energy per each one EUR million of revenues (energy consumption intensity) of a company which represents 1% of the current value of all investments (assets) accounts for two times lower energy consumption intensity attributed to the financial market participant than the consumption of energy per each one EUR million of revenues of a company which represents 2% of the current value of all investments (assets). The indicator is comparable for financial market participants holding various assets.	The indicator is expressed in GWh per each one EUR million of the companies' respective revenues.	34.97%
7. Activities resulting in adverse impact for biodiversity sensitive areas	Bloomberg	It is assumed that if companies have facilities / conduct operations in biodiversity sensitive areas or in the vicinity of such areas, the operation of such companies has adverse impact on these areas. Share of investments made in companies having facilities / conducting operations in biodiversity sensitive areas	The indicator is expressed as a share (percentage) of investments (assets).	0.00%

		or in the vicinity of such areas, if the operation of such companies has an adverse impact on these areas, is computed as the share (percentage) of the current value of investments in companies that have at least one facility or conduct operations in such area in the current value of all investments. The indicator is comparable for various assets.		
8. Emissions into water	Bloomberg	Tons of emissions into water generated by investee companies are multiplied by the ratio of the current value of investment in a given company and the current value of all investments. In the next step, the indicators for all investee companies are summed up. For example, a ton of emissions into water generated by a company which represents 1% of the current value of all investments (assets) accounts for two times lower a share in the indicator for a financial product than a ton of emissions into water generated by a company which represents 2% of the current value of all investments (assets). The indicator is expressed in tons of emissions into water per one EUR million of investment value (assets) of the financial product. The indicator is comparable for financial market participants holding various assets.	The indicator is expressed as a percentage of the investment value (assets).	1.26%
9. Indicator of hazardous waste and radioactive waste	Bloomberg	Tons of hazardous waste and radioactive waste generated by investee companies are multiplied by the ratio of the current value of investment in a given company and the current value of all investments. In the next step, the indicators for all investee companies are summed up. For example, a ton of waste emissions generated by a company which represents 1% of the current value of all investments (assets) accounts for two times lower a share in the indicator for a financial product than a ton of waste emissions generated by a company which represents 2% of the current value of all investments (assets). The indicator is comparable for financial market participants holding various assets.	The indicator is expressed tons of hazardous waste and tons of radioactive waste per one EUR million of investment value (assets).	17.51%
10. Violations of UN Global Compact principles or Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises.	Bloomberg	The share of investments in investee companies that have violated or continue to violate UN Global Compact principles or OECD Guidelines for Multinational Enterprises in the current value of all investments.	The indicator is expressed as a percentage of the investment value	69.26%
11. No processes or mechanisms to monitor compliance with Global Compact principles and the OECD Guidelines for Multinational Enterprises	Bloomberg	Share of investments in investee companies without policies to monitor compliance with the UNGC principles, OECD Guidelines for Multinational Enterprises, and without grievance/complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises in the current value of all investments. The indicator is comparable for financial market participants holding various assets.	The indicator is expressed as a percentage of the investment value (assets).	69.26%
12. Unadjusted gender pay gap	Bloomberg	Average unadjusted gender pay gap of investee companies is multiplied by the ratio of the current value of investment in a given company and the current value of all investments. In the next step, the indicators for all investee companies are summed up. For example, an unadjusted gender pay gap in a company which represents 1% of the current value of all investments (assets) accounts for two times	The indicator is expressed as a percentage of the unadjusted pay gap	11.10%

		lower a share in the indicator for the financial product than an unadjusted gender pay gap in a company which represents 2% of the current value of all investments (assets). The indicator is comparable for financial market participants holding various assets.		
13. Board gender diversity	Bloomberg	Average ratio of female to male board members in investee companies, expressed as a percentage of the total number of board members, is multiplied by the ratio of the current value of investment in a given company and the current value of all investments. In the next step, the indicators for all investee companies are summed up. For example, the ratio of female to male board members in a company which represents 1% of the current value of all investments (assets) accounts for two times lower a share in the indicator for a financial product than the ratio of female to male board members in a company which represents 2% of the current value of all investments (assets). The indicator is comparable for financial market participants holding various assets.	The indicator is expressed as a percentage reflecting the average ratio of female to male board members in the boards of investee companies, expressed as a percentage of the total number of board members.	80.74%
14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons, and biological weapons).	Bloomberg	Share of investments in investee companies involved in the manufacture or selling of controversial weapons in the current value of all investments.	The indicator is expressed as a percentage of the investment value	69.21%
Indicators applicable to investments in to	reasury bonds and bo	onds issued super-nationally		
15. Intensity of greenhouse gas emissions	Discontinue	The current value of investment in the bonds of a given country is divided by the current value of all investments — in this way we compute the share of investment in the bonds of a given country in the value of all investments of the financial market participant. In the next step, for each bond investee country we divide the greenhouse gas emissions in this country by the gross domestic product in EUR million — in this way we compute the intensity of the country's greenhouse gas emissions. In the next step, the share of investments in the bonds of a given country in the value of all investments is multiplied by the	The indicator is expressed in tons of CO2 per one EUR	
	Bloomberg	intensity of the country's greenhouse gas emissions - in this way we compute the exposure of a financial market participant to the intensity of greenhouse gas emissions of this country. In the next step, the exposure to all bond investee countries is summed up - in this way we compute the intensity of greenhouse gas emissions attributable to the financial market participant. It is comparable for financial market participants holding various assets.	million of the gross domestic product of the bond investee countries.	99.93%

		indirectly, as a percentage of all the bond investee countries, named in international treaties and conventions, UN principles as well as - in the relevant cases - in national law		
Optional indicators applicable to investm	ents in treasury bond	ds and bonds issued super-nationally		
17. Share of bonds not issued based on the EU regulations on environmentally sustainable bonds8	Bloomberg	Share of bonds not issued based on the EU regulations on environmentally sustainable bonds in the current value of all investments.	The indicator is expressed as a percentage of the investment value (assets) of the market participant.9	100%
22. Non-cooperative tax jurisdictions <sub>10</sub>	European Commission11	Share of investments in jurisdictions listed in the EU's list of non-cooperative tax jurisdictions in the current value of all investments.	The indicator is expressed as a percentage of the investment value	100%

<sup>8</sup> Table 2 - Additional climate-related indicators and other environmental indicators

<sup>9</sup> At present such bonds (EU Green Bonds) are not available

<sup>10</sup> Table 3 - Additional indicators in respect of social and employee issues, respect for human rights and combating corruption and bribery

<sup>11</sup> The EU's list of non-cooperative tax jurisdictions: <a href="https://www.consilium.europa.eu/en/policies/eu-list-of-non-cooperative-jurisdictions/">https://www.consilium.europa.eu/en/policies/eu-list-of-non-cooperative-jurisdictions/</a>

#### **Engagement Policy**

# a) brief summary of the engagement policy, referred to in Article 3(g) of Directive 2007/36/EC of the European Parliament and of the Council

The "Policy of PZU Życie SA's Engagement in Companies Listed in a Regulated Market" provides a detailed description of actions taken in respect of PZU Życie SA's engagement in companies listed in the regulated market (hereinafter referred to as the "issuers"). The actions related to PZU Życie SA's engagement in the investee issuers include monitoring of the issuers, engaging in dialog with the issuers and communication with members of the issuers' governance bodies as well as the exercise of voting rights and other rights attaching to issuers' shares.

As regards monitoring of issuers, special attention is devoted to issues that have an impact on conscious investment decision-making, in order to achieve long-term value growth, consider investment risks in respect of social impact, impact on the natural environment as well as impact of governance principles, i.e. the aspects of the socially responsible investing process.

As regards dialog with the issuers, PZU Życie SA communicates its expectations in respect of the standards that the issuers should apply in their business activities.

As regards voting at shareholder meetings of the issuers, PZU Życie SA considers environmental, social responsibility and corporate governance issues. PZU Życie SA promotes high corporate governance standards, in particular those that advance transparency, equal treatment of shareholders, independent oversight and the responsibility of shareholders and members of corporate governance bodies.

The "Policy of PZU Życie SA's Engagement in Companies Listed in a Regulated Market" is published on the Company's website pzu.pl.

Every year, PZU Życie SA prepares and publishes a report on the implementation of the Policy in the previous year, which included a general account of voting at shareholder meetings of the issuers and a description of the key votes. The report is published on the Company's website pzu.pl. not later than by 30 June.

# Adverse impacts indicators considered in the engagement policy

The Policy does not consider adverse sustainability indicators.

As mentioned above when taking voting decisions at shareholder meetings of the issuers, PZU Życie SA considers environmental, social responsibility an corporate governance issues. PZU Życie SA promotes high corporate governance standards, in particular those that advance transparency, equal treatment of shareholders, independent oversight and the responsibility of shareholders and members of corporate governance bodies.

Information regarding how the engagement policy will be adapted if the material adverse impacts have not been reduced over a time longer than one reporting period

PZU Życie SA does not plan any adaptations of the Engagement Policy.

# b) brief summary of any other engagement policy to reduce material adverse impacts Not applicable.

#### References to international standards

In this section, PZU Życie SA discloses whether and to what extent it observes corporate social responsibility codes as well as internationally recognized standards of due diligence and reporting. Furthermore, PZU Życie SA discloses İn the relevant cases to what degree it has complied with the goals of the Paris Agreement.

PZU Życie SA does not apply international standards in the context of material adverse sustainability impacts of investment decisions in respect of financial products.

The PZU Group prepares an annual non-financial information report. The information presented in this report is to help in the understanding and improving the results of the execution of the ESG strategy and cultivate long-term relations with key stakeholders. This report is prepared in accordance with the amended Accounting Act of 29 September 1994 and its requirements pertaining to non-financial reporting. This presents non-financial information as referred to in Article 49(b) of the Act. Substantive guidance on defining the scope and content of this report were also provided by international guidelines and standards, including the Global Reporting Initiative

(GRI Standards of reporting) 2021 and GRI standards 2016 for detailed topics, guidelines on integrated reporting (issued by the International Integrated Reporting Council, IIRC), as well as the guidelines of the European Commission on reporting non-financial information, with detailed disclosures of climate data, as well as the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). As regards climate, the carbon footprint was calculated in accordance with the international GHG Protocol Corporate Accounting and Reporting Standard. This report also contains information regarding taxonomic disclosures pursuant to the Commission Delegated Regulation (EU) 2021/2139 and the supplementing Regulation 2020/852 of the European Parliament and of the Council (EU). The data on the PZU Group's carbon footprint in 2021 and 2022 has been verified by an independent external company Bureau Veritas Polska Sp. z o.o. The other parts of the report were not subject to additional external verification. Pursuant to the requirements of the Accounting Act, the non-financial report of the PZU Group comprises the consolidated non-financial data pertaining to the PZU Group and its parent company PZU SA, in line with the organizational structure applied for the purposes of the Consolidated Financial Statements.

- a) information on the indicators used to consider the material adverse sustainability impacts as referred to in Article 6
  sec. 1 of the Delegated Regulation, by means of which the degree of compliance with the said code or alignment with
  the said objectives referred to above is measured
  Not applicable.
- b) information on the method and data used to measure the degree of compliance with the said code or alignment with the said objectives referred to above, including a description of the scope of application, data sources and how the method forecasts the material adverse impacts of the investee companies' operations Not applicable.
- c) information on whether forward-looking climate scenarios are used and, if so, the name and provider of the scenario and when it was developed
   Not applicable.
- d) if a forward-looking climate scenario is not used an explanation of why the financial market participant considers forward-looking climate scenarios relevant
   Not applicable.

#### Comparison with historical data

Not applicable. The Delegated Regulation entered into force on 1 January 2023. Data for 2021 is not available.