



Information resulting from Article 7(1) of the SFDR¹ and from Articles 4-10 and Annex I of the Delegated Regulation²

Statement on principal adverse sustainability impacts of investment decisions³ at product level

Financial product

Pogodna Jesień individually continued group pension insurance

LEI

549300TNSHGVU2UXO005⁴

Summary

PZU Życie SA considers the material adverse sustainability impacts of its investment decisions at the level of its Pogodna Jesień individually continued group pension insurance product.

This statement constitutes a statement on the principal adverse sustainability impacts resulting from PZU Życie SA's activities at product level. The product consists of unit-linked life insurance.

This statement on the principal adverse sustainability impacts covers the reference period from 1 January 2024 to 31 December 2024.

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).

PZU Życie SA outsourced to TFI PZU SA the management of unit-linked life insurance funds whose assets are invested in equities or bonds. Being guided by the wording of the contracts of insurance, the policyholder's and the insured's interests, as well as considering the product's 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 principal 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 principal adverse sustainability impacts of investment decisions is limited or excluded in respect of products with defined investment policy.

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

1 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

2 Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022, supplementing 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.

3 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

4 LEI for PZU Życie SA

Description of the principal adverse sustainability impacts

A specific metric applied to assess each indicator of principal adverse impacts is given in the “Metric” column in each table, and the result of measurement is given in the “Impact” column. Some indicators of principal adverse impacts are calculated in absolute values and therefore they cannot change in time with changes in the values of investments of PZU Życie SA. Other indicators of principal adverse impacts are calculated in relative values and therefore they take into account changes in time in the relevant basis of calculations.

PZU Życie SA notes that not all of the companies in which the funds have been invested are required to prepare and publish data on the indicators of adverse sustainability impacts. Some of these companies publish such information on a voluntary basis. 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 the “Explanation” column, it is indicated what percentage of the investment portfolio accounts for companies that have published a given indicator (assuming the look-through criterion referred to below). For indicators in which this percentage is low, the data published may not reliably reflect the principal adverse sustainability impacts of PZU Życie SA’s operations. Data coverage percentages are given for all the investments of PZU Życie SA rather than a given asset class, which affects the level of presented indicators.

The unit-linked insurance funds are invested, among others, in participation units and titles of mutual funds. To calculate the indicators of principal adverse impacts on sustainability for individual investee companies, PZU Życie SA has used the look-through approach, i.e. it considered companies in mutual funds’ portfolios proportionately to the value of the unit-linked fund investment into a given mutual 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 principal 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 99.5% of PZU Życie SA’s financial product assets, whereas the indicators for companies accounting for the remaining 0.5% of PZU Życie SA’s financial product assets have been disregarded.

Indicators applicable to investments in investee companies						
Adverse sustainability impact indicator		Metric	Impact [2024]	Impact [2023]	Explanation	Actions taken, actions planned and targets set for the next reference period
CLIMATE-RELATED INDICATORS AND OTHER ENVIRONMENTAL INDICATORS						
Greenhouse gas emissions	1. Greenhouse gas emissions	Scope 1 greenhouse gas emissions	3.81 K MT CO2e	6.57 K MT CO2e	Data coverage, scope 1: 100% (2023: 95.92%)	Figures may differ in any period as a result of changes in the values of assets of the financial product and in connection with the market circumstances which affect the assets and asset weights of the financial product. Being guided by the wording of the contracts of insurance, the policyholder’s and the insured’s interests as well as considering the financial products’ investment objectives, rules of asset investment diversification and other investment restrictions, the investment
		Scope 2 greenhouse gas emissions	0.52 K MT CO2e	0.60 K MT CO2e	Data coverage, scope 2: 100% (2023: 95.92%)	
		Scope 3 greenhouse gas emissions	15.51 K MT CO2e	18.02 K MT CO2e	Data coverage, scope 3: 100% (2023: 90.05%)	
		Total greenhouse gas emissions	19.85 K MT CO2e	25.18 K MT CO2e	Data coverage, total emissions: 100% (2023: 90.05%) For each investee company, the share of the current value of the investment in the company’s enterprise value is calculated, which is multiplied by the company’s greenhouse gas emissions – in this	

					<p>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 product. The indicator is expressed in metric kilotons (K MT) of carbon dioxide (CO₂). It is higher for financial market participants holding more assets, and lower for financial market participants holding less assets.</p>	<p>selection criteria and the adopted benchmarks and reference rates arising from the law for managing the portfolios of such financial products, PZU Życie SA takes into account the material adverse sustainability impacts only when it does not negatively impact the expected rate of return on the product for the policyholder 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 a defined investment policy.</p>
	2. Carbon footprint	Carbon footprint	302.53 K MT CO ₂ e/EUR million invested	394.94 K MT CO ₂ e/EUR million invested	<p>Data coverage: 100% (2023: 94.13%)</p> <p>The greenhouse gas emissions attributable to a financial market participant is calculated (in the manner described above for indicator 1 “Greenhouse gas emissions”), which is then divided by the current value of all investments⁵. It is comparable for financial market participants holding various assets.</p>	<p>At present, PZU Życie SA’s insurance agreements currently in force do not envisage the objective of mitigating the principal adverse impacts of investments. PZU Życie SA does not exclude that in the future the objective of mitigating the principal 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.</p>
	3. Intensity of greenhouse gas emissions in investee companies	Intensity of greenhouse gas emissions in investee companies	139.53 K MT CO ₂ e/EUR million in revenues ⁵	161.40 K MT CO ₂ e/EUR million in revenues	<p>Data coverage: 100% (2023: 94.13%)</p> <p>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, the intensity of the company’s greenhouse gas emissions is computed.</p> <p>Then, the share of investment in a given 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</p>	<p>Furthermore, PZU Życie SA discloses principal adverse impacts of its investments.</p> <p>PZU Życie SA has not set targets for reducing or achieving specific levels of the impacts (indicators).</p> <p>PZU Życie SA has adopted the “Policy of PZU Życie SA’s Engagement in Companies Listed in the Regulated Market”. It is described in section “Engagement Policy”.</p>

⁵ 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 III.2 in consolidated questions and answers JC 2023 18)

				financial market participant to the intensity of 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 emission intensity attributable to the financial market participant. It is comparable for financial market participants holding various assets.	
4. Exposure to enterprises of the fossil fuel sector	Share of investments made in enterprises operating in the fossil fuel sector	2.09%	3.27%	<p>Data coverage: 100% (2023: 99.81%)</p> <p>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;</p> <p>(ii) enterprises that generate any kind of revenues from exploration, mining, distribution or refining of liquid fossil fuels; and</p> <p>(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.</p> <p>The indicator is comparable for financial market participants holding various assets.</p>	
5. Share of energy consumed and generated from non-renewable sources	Share of non-renewable energy consumed and generated by investee companies, relative to energy resources from renewable sources, expressed as a percentage of the total energy resources	Consumption 4.05% Production 0.37%	Consumption 1.36% Production 0.00%	<p>Consumption: Data coverage: 37.28% (2023: 13.02%)</p> <p>Production: Data coverage: 3.88% (2023: 0%)</p> <p>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. The share non-renewable energy consumed and generated by the investee companies, relative to energy resources from renewable sources, expressed as a percentage of the 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</p>	

				<p>non-renewable sources consumed 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.</p>	
6. Energy consumption intensity per given sector with significant climate impacts	Energy consumption expressed in GWh per EUR million generated in revenues of investee companies attributable to the respective sector with significant climate impact	0.01 GWh/EUR million in revenues	0.03 GWh/EUR million in revenues	<p>Data coverage: 23.54% (2023: 54.18%)</p> <p>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.</p>	
	Energy consumption intensity per sector A with significant climate impacts: Agriculture, forestry and fishing	0 GWh/EUR million in revenues	No details		
	Energy consumption intensity per sector B with significant climate impacts: Mining and quarrying	0 GWh/EUR million in revenues	No details		
	Energy consumption intensity per sector C with significant climate impacts: Manufacturing	0 GWh/EUR million in revenues	No details		
	Energy consumption intensity per sector D with significant climate impacts: Electricity, gas and steam supply	0.01 GWh/EUR million in revenues	No details		
	Energy consumption intensity per sector E with significant climate impacts: Water supply; sewerage, waste management and remediation activities	0 GWh/EUR million in revenues	No details		
	Energy consumption intensity per sector F with significant climate impacts: Construction	0 GWh/EUR million in revenues	No details		
	Energy consumption intensity per sector F with significant climate impacts: Wholesale and retail trade;	0 GWh/EUR million in revenues	No details		

		repair of motor vehicles and motorcycles				
		Energy consumption intensity per sector H with significant climate impacts: Transportation	0 GWh/EUR million in revenues	No details		
		Energy consumption intensity per sector L with significant climate impacts: Real estate activities	0 GWh/EUR million in revenues	No details		
Biodiversity	7. Activities resulting in adverse impact for biodiversity sensitive areas	Share of investments made in companies having facilities/conducting operations in biodiversity sensitive areas or in the vicinity of such areas, if the operation of such companies exerts an adverse impact on these areas	0.00	0.00	Data coverage: 0% (2023: 0%) 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 or in the vicinity of such areas, if the operation of such companies exerts 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.	
Water	8. Emissions into water	0.00	0.00 tons/EUR million invested	0.24 tons/EUR million invested	Data coverage: 0% (2023: 1.05%) 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 EUR million of investment value (assets) of the financial product. The indicator is comparable for financial market participants holding various assets.	
Wastes	9. Indicator of hazardous waste and radioactive waste	Tons of hazardous waste and radioactive waste generated by investee companies per EUR million invested, indicator expressed as a weighted average	0.00 tons/EUR million invested	0.01 tons/EUR million invested	Data coverage: 8.96% (2023: 25.49%) 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.	

INDICATORS IN RESPECT OF SOCIAL AND EMPLOYEE ISSUES, RESPECT FOR HUMAN RIGHTS AND COMBATING CORRUPTION AND BRIBERY						
Social and employee issues	10. Violations of UN Global Compact principles or Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in companies that violated or continue to violate the Global Compact initiative or the OECD Guidelines for Multinational Enterprises	3.51%	4.07%	Data coverage: 94.87% (2023: 94.49%) 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.	Figures may differ in any period as a result of changes in the values of assets of the financial product and in connection with the market circumstances which affect the assets and asset weights of the financial product.
	11. No processes or mechanisms to monitor compliance with Global Compact principles and the OECD Guidelines for Multinational Enterprises	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 Global Compact initiative principles or the OECD Guidelines for	11.15%	11.10%	Data coverage: 94.87% (2023: 94.49%) Share of the current value of investments in investee companies without policies to monitor compliance with the UNGC principles, OECD Guidelines for Multinational Enterprises, and without grievance/complaints	Being guided by the wording of the contracts of insurance, the policyholder's and the insured's interests as well as considering the financial products' investment objectives, rules of asset investment diversification and other investment restrictions, the investment selection criteria and the adopted benchmarks and reference rates arising

	Multinational Enterprises			handling mechanisms to address violations of the Global Compact initiative principles or the OECD Guidelines for Multinational Enterprises in the total value of all investments. The indicator is comparable for financial market participants holding various assets.	from the law for managing the portfolios of such financial products, PZU Życie SA takes into account the material adverse sustainability impacts only when it does not negatively impact the expected rate of return on the product for the policyholder 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 a defined investment policy. At present, PZU Życie SA's insurance agreements currently in force do not envisage the objective of mitigating the principal adverse impacts of investments. PZU Życie SA does not exclude that in the future the objective of mitigating the principal 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.
12. Unadjusted gender pay gap	Average unadjusted gender pay gap in investee companies	7.88%	30.32%	Data coverage: 63.14% (2023: 1.69%) 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 lower a share in the indicator for a financial product than 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	Average ratio of female to male board members in investee companies, expressed as a percentage of the total number of board members	10.28%	29.21%	Data coverage: 99.82% (2023: 71.42%) 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 the given company and the current value of all investments. 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	Furthermore, PZU Życie SA discloses principal adverse impacts of its investments. PZU Życie SA has not set targets for reducing or achieving specific levels of the impacts (indicators). PZU Życie SA has adopted the "Policy of PZU Życie SA's Engagement in Companies Listed in the Regulated Market". It is described in section "Engagement Policy".

					which represents 2% of the current value of all investments (assets). The indicator is comparable for financial market participants holding various assets.	
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons, and biological weapons).	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0.00%	0.00%	Data coverage: 94.87% (2023: 94.49%) Share of investments in investee companies involved in the manufacture or selling of controversial weapons in the current value of all investments.	

Indicators applicable to investments in treasury bonds and bonds issued transnationally

Adverse sustainability impact indicator		Metric	Impact [2024]	Impact [2023]	Explanation	Actions taken, actions planned and targets set for the next reference period
Environmental issues	15. Intensity of greenhouse gas emissions	Intensity of greenhouse gas emissions for bond investee countries	157.83 t CO2e/EUR million GDP	216.01 t CO2e/EUR million of the GDP	Data coverage: 100% (2023: 100%) 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 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	Figures may differ in any period as a result of changes in the values of assets of the financial product and in connection with the market circumstances which affect the assets and asset weights of the financial product. Being guided by the wording of the contracts of insurance, the policyholder's and the insured's interests as well as considering the financial 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 for managing the portfolios of such financial products, PZU Życie SA takes into account the material adverse sustainability impacts only when it does not negatively impact the expected rate of return on the product for the policyholder 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 a defined

					financial market participant. It is comparable for financial market participants holding various assets.	investment policy.
Social issues	16. Bond investee countries with a record of breaches in respect of social issues	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 and, where applicable, national law	0	0	Data coverage: 100% (2023: 100%) The Bloomberg FH Freedom Status reflects the degree of freedom in the country/territory. Countries/territories may be ranked as Free, Partly Free or Not Free. The combination of the general score assigned for political rights and the general score assigned for civil liberties, with the same weight, translates into the Free, Partly Free or Not Free status. A country having a record of breaches in respect of social issues is deemed to have the Not Free status. 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 and, where applicable, national law.	At present, PZU Życie SA's insurance agreements currently in force do not envisage the objective of mitigating the principal adverse impacts of investments. PZU Życie SA does not exclude that in the future the objective of mitigating the principal 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 principal adverse impacts of its investments. PZU Życie SA has not set targets for reducing or achieving specific levels of the impacts (indicators). PZU Życie SA has adopted the "Policy of PZU Życie SA's Engagement in Companies Listed in the Regulated Market". It is described in section "Engagement Policy".

Indicators Applicable to Investments in Property						
Adverse sustainability impact indicator		Metric	Impact [2024]	Impact [2023]	Explanation	Actions taken, actions planned and targets set for the next reference period
Fossil fuels	17. Fossil fuels exposure in connection with property	Share of investments in property related to the extraction, storage, transport or production of fossil fuels	Not applicable. Assets of PZU Życie SA's financial products are not invested in property.			
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

CLIMATE-RELATED INDICATORS AND OTHER ENVIRONMENTAL INDICATORS						
Adverse sustainability impact indicator		Metric	Impact [2024]	Impact [2023]	Explanation	Actions taken, actions planned and targets set for the next reference period
Green securities	17. Share of bonds not issued based on the EU regulations on environmentally sustainable bonds	Share of bonds not issued based on the EU regulations on environmentally sustainable bonds	100%	100% 6	Data coverage: 100% (2023: 100%) Share of bonds not issued based on the EU regulations on environmentally sustainable bonds in the current value of all investments.	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 transnationally.

ADDITIONAL INDICATORS IN RESPECT OF SOCIAL AND EMPLOYEE ISSUES, RESPECT FOR HUMAN 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 transnationally						
Adverse sustainability impact indicator		Metric	Impact [2024]	Impact [2023]	Explanation	Actions taken, actions planned and targets set for the next reference period
Governance	22. Non-cooperative tax jurisdictions	Investments in jurisdictions listed in the EU’s list of non-cooperative tax jurisdictions ⁷	0	0	Data coverage: 100% (2023: 100%) Share of investments in jurisdictions listed in the EU’s list of non-cooperative tax jurisdictions in the current value of all investments.	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 transnationally.

OTHER INDICATORS

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

Description of the strategy of identification and hierarchy ranking of principal sustainability impacts

PZU Życie SA applies internal sustainability risk assessment methodologies for equity securities and corporate bonds and for bonds issued, guaranteed or secured by states, local government units or transnational organizations.

For sustainability risk assessment regarding issuers of equity securities (shares, etc.) and corporate bonds, PZU Życie SA uses ESG scorings prepared and made available by Bloomberg.

For sustainability risk assessment regarding issuers of treasury bonds, PZU Życie SA uses generally available data (indicators) obtained from independent organizations. The risk assessment methodology for the issuers takes into consideration environmental (E), social (S) and governance (G) criteria.

When making investment decisions in respect of investing funds covering insurance liabilities arising from insurance contracts, PZU Życie SA applies an ESG criteria-based internal methodology for assessing (scoring) instruments in which managed funds are invested, or issuers of such instruments, or bonds issued, guaranteed or secured by countries, local government units and transnational organizations. PZU Życie SA's sustainability risk assessment is based, among others, on publicly available data (indicators) obtained from independent organizations (such as e.g. the World Bank).

For debt securities issued, backed or guaranteed by the State Treasury of the Republic of Poland, the highest rating was assigned in accordance with the applicable methodology, and low risk was assumed in terms of sustainability criteria.

As mentioned above, being guided by the wording of the contracts of insurance, the policyholder's and the insured's interests, as well as considering the product's 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 funds collected within the Pogodna Jesień individually continued group pension insurance product, 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 for the policyholder 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.

At present, PZU Życie SA's contracts of Pogodna Jesień individually continued group pension insurance currently in force do not envisage the objective of mitigating the material adverse impacts of investments. Furthermore, PZU Życie SA discloses these principal adverse impacts of investments.

As a result, PZU Życie SA has not developed a strategy of identification and hierarchy ranking of principal adverse sustainability impacts for the investment product 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(1) points (a), (b) and (c) of the Delegated Regulation, as well as the identification and evaluation of the principal adverse impacts referred to in Article 6(1), and in particular an explanation of how these methods take into account the likelihood and severity of such principal adverse impacts, including their potentially irreversible character

methods of selecting the indicators referred to in Article 6(1) points (a), (b) and (c) of the Delegated Regulation

The indicators referred to in Article 6(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 policyholders who have entered into an insurance agreement. In addition, it is a comprehensive factor, rather than one focusing on one section of activities only. In addition, data for the publication of the indicator are easily available.

The indicators referred to in Article 6(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 is unambiguous because investments in such jurisdictions can be identified in unequivocal and undisputed manner. Furthermore, the indicator covers important aspects given the very adverse impact of investments in such jurisdictions. Therefore, it represents important information weight for the policyholders. In addition, it is a comprehensive factor, rather than one focusing on one section of activities only. In addition, data for the publication of the indicator are easily available.

The indicators referred to in Article 6(1) point (c) of the Delegated Regulation are potential other indicators. As has been mentioned above, PZU Życie SA does not apply any other adverse sustainability impacts in order to identify and evaluate additional principal adverse impacts for a given sustainability factor.

methods of defining and assessing principal adverse impacts as referred to in Article 6(1) of the Delegated Regulation

PZU Życie SA does not apply methods of defining and assessing principal adverse impacts referred to in Article 6(1) of the Delegated Regulation, and therefore it is impossible to provide an explanation of how these methods take into account the likelihood and severity of such principal adverse impacts, including their potentially irreversible character.

d) 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

Methods and processes for determining and monitoring principal adverse impacts depend on data accessibility and the data may be of less than optimum quality. Precise calculation of indicators of principal adverse impacts in investment portfolios requires secured high quality data for reference investee companies. Although many companies measure metrics relevant for calculating indicators of principal adverse impacts and publish reports of such data, discrepancies in reporting systems and disclosures used by various issuers in various sectors and countries result in incoherent accessibility of the required indicators. When estimates are made by a data provider, estimated data may reduce the reliability of the indicators, as they may not accurately reflect the actual impact of the given company.

The approach taken by PZU Życie SA to calculate principal adverse impacts assumes that they should be based on the most recent available information on the impacts of investments, but most of the information used to determine principal adverse impacts is based on historical data, taking into account the timing of disclosure by investee companies and consideration by third-party data providers.

e) data sources used

PZU Życie SA obtains data applicable to companies and countries in which investments have been made from a third-party independent data provider, Bloomberg. The data include data published by issuers and, in relevant cases, data estimated by an external data provider.

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 the 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 has been mentioned above, when 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.

a) information regarding how the engagement policy will be adapted if the principal 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 principal 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 in the relevant cases to what degree it has complied with the goals of the Paris Agreement.

PZU Życie SA considers the principal adverse impacts for sustainability factors: (10) Violations of UN Global Compact principles or Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises and (11) No processes or mechanisms to monitor compliance with Global Compact principles and the OECD Guidelines for Multinational Enterprises, in quantitative terms, that is, it publishes data.

Apart from the principal adverse impacts on sustainability factors, PZU Życie SA does not apply international standards in the context of principal adverse sustainability impacts of investment decisions in respect of products.

a) information on the indicators used to consider the principal 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 principal 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

A number of factors affect changes of indicators of principal adverse impacts in time.

Figures may differ in any period as a result of changes in the values of assets of the financial market participant, changes to the composition of the investment portfolio and in connection with the market circumstances which affect the assets and asset weights in the investment portfolio. What also affects changes in the indicators are changes in the market between two reference periods as well as extension or limitation of the scope of data presented by the issuers, which is shown by data coverage percentages.

Data from third-party providers are updated periodically, often to reflect more recent data or estimates of investee companies. There are also situations where data are deleted because they have been identified as incorrect or inaccurate. For indicators concerning topics for which impact data are just beginning to become available, these updates can result in significantly different impact data for a given company.

Some indicators refer to the company's total enterprise value, so fluctuations in the company's enterprise value may also cause changes in the share of principal adverse impacts, even if investments in the company have not changed.

Variability in the coverage of data available for a given indicator of principal adverse impacts may affect the reported value as relevant data appear or disappear for a given investment. The coverage may also be affected by changes in data availability from third-party data providers or changes in the portfolio. Where the coverage is low, these changes may have a more noticeable impact on the reported value of the indicator.