

Information pursuant to Article 4 of Regulation (EU) 2019/2088 on sustainability disclosures in the financial services sector

Statement on principal adverse impacts of investment decisions on sustainability factors

Financial market participant – Interamerican Hellenic Insurance Company S.A.

Summary

INTERAMERICAN Hellenic Insurance Company S.A. (hereinafter "INTERAMERICAN" or "Company") considers principal adverse impacts of its investment decisions on sustainability factors.

This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January to 31 December 2023.

These factors cover issues related to the environment, society, labor, human rights, as well as action against corruption and bribery. In the context of its investment actions and in alignment with the legislative provisions, the Company seeks to limit the principal adverse impacts caused by its investment decisions. The degree and manner in which principal adverse impacts are incorporated into the investment process depends on various factors, including the type of fund or strategy, the asset class and the availability of reliable data.

INTERAMERICAN, as a member of the Achmea Group, does not simply focus on the aforementioned impacts on sustainability factors, but has established sustainability as a central element in its management and operational initiatives. The Company supports the Group's ambition for a climate-neutral business operation by 2030, climate-neutral investments by 2040 and climate-neutral products by 2050.

Regarding its investment activities, INTERAMERICAN follows the guidelines of Achmea Group, the Asset Liability Management (ALM) study, the Investment Policy as well as other related policies of the Group. At the same time, INTERAMERICAN's asset management is mainly carried out in-house, with only a small portion being placed through mutual funds with external asset managers.

INTERAMERICAN manages a portfolio of direct investments, mainly in bonds (government and corporate), stocks, mutual funds and cash. In addition, life insurance products linked to investments (Unit-Linked) refer to products that allow the policyholder to choose, through a list of mutual funds of asset management companies, those that correspond to his preferences and needs.

INTERAMERICAN takes sustainability risks into account when making investment decisions, mainly through its investment policy and its socially responsible investment policy, which include various qualitative and quantitative criteria with the aim of more effective risk management, and therefore the safeguarding of capital of customers.

These criteria include the harmonization of bond issuers with environmental, social and corporate governance criteria (hereinafter "ESG criteria"). As most of the portfolio is placed in highly rated government bonds based in the European Union, several credit rating agencies take ESG criteria into account extensively; therefore INTERAMERICAN's investment decisions already include the evaluation of these criteria. Additionally, when selecting issuers of securities, the Company excludes those who belong to specific professional activities or countries that are not in line with its corporate policy and philosophy. In particular, in the selection of corporate bonds, the majority of which are also of high credit rating, the activities that will be financed from the capital raised by each issuer (use of proceeds) are taken into account.

In order to assess the sustainability risks of mutual funds originating from external asset managers, INTERAMERICAN includes in the investment selection process a quality ranking system for sustainability factors. Specifically, the process includes a review of each external asset manager's ESG philosophy and sustainability report, if available, to determine a score, which is then included in the model's weighted average to determine the final list of investments.

This report presents indicators that measure adverse sustainability impacts. Of these indicators, the first fourteen refer to investments in corporate entities and are mandatory for financial market participants, who are required to submit relevant reports. In addition, they should choose at least two more indicators from a list included in the annex to Article 4 of the Sustainability Regulation. The fourteen mandatory indicators are presented in Table 1.

The first category refers to "Indicators applicable to investments in companies", which includes climatic and other environmental indicators, as well as indicators related to social and personnel issues, respect for human rights and the fight against corruption and bribery. The second category refers to "Indicators applicable to investments in sovereigns and supranationals" and the third to "Indicators applicable to investments in real estate assets". Also, regarding the optional indicators, INTERAMERICAN has chosen four of them. Specifically, as shown in Tables 2 and 3, the indicators fall under the following categories: "Additional climate and other environment-related indicators" and "Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters».

It is noted that due to the limited availability and quality of data, the determination of quantitative targets is a challenge. In order to achieve the goals and comply with the investment frameworks mentioned above, it is necessary to constantly monitor and examine the indicators, as well as to analyze possible measures to improve them.

In its endeavor to compile in a more accurate manner the following information, INTERAMERICAN relies on the current interpretation of the Regulation, the available technical standards ("RTS") as well as the clarifications and guidelines published by the competent

authorities at the time of publication of this statement. The available guidelines naturally carry a relative margin of interpretation and are continually adapted to the needs of this framework. Considering the above facts, the Company pays special attention to the relevant developments and undertakes to adjust its approach accordingly, based on the applicable assumptions and methodology.

It is noted that the Greek version of this statement is the original. In case of any inconsistencies between the two versions, the Greek version is to be followed.

Description of the principal adverse impacts on sustainability factors

| Table 1 | | | | | | |
|--|---------------------|-----------------------|-------------------------------|------------------------------|--|---|
| Indicators applicable to investments in investee companies | | | | | | |
| Adverse sustainability indicator | Metric | Impact 2023 | Impact 2022 | Explanation | Actions taken, and actions planned and targets set for the next reference period | |
| CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS | | | | | | |
| Greenhouse gas emissions | 1. GHG emissions | Scope 1 GHG emissions | 12.033,77 tCO ₂ | 3.136,64 tCO ₂ | The portfolio included in 2023 is roughly triple in value compared to 2022, therefore such gross differences in indicators presented as absolute numbers are expected. | INTERAMERICAN will monitor the progress of this indicator and consider possible measures to improve it. |
| | | Scope 2 GHG emissions | 1.963,34 tCO ₂ | 412,26 tCO ₂ | The portfolio included in 2023 is roughly triple in value compared to 2022, therefore such gross differences in indicators presented as absolute numbers are expected. | INTERAMERICAN will monitor the progress of this indicator and consider possible measures to improve it. |
| | | Scope 3 GHG emissions | 63.974,65 tCO ₂ | 26.062,25 tCO ₂ | The portfolio included in 2023 is roughly triple in value compared to 2022, therefore such gross differences in indicators presented as absolute numbers are expected. | INTERAMERICAN will monitor the progress of this indicator and consider possible measures to improve it. |
| | | Total GHG emissions | 13.996,98 tCO ₂ | 3.548,9 tCO ₂ | The portfolio included in 2023 is roughly triple in value compared to 2022, therefore such gross differences in indicators presented as absolute numbers are expected. | INTERAMERICAN will monitor the progress of this indicator and consider possible measures to improve it. |
| | 2. Carbon footprint | Carbon footprint | 236,78 tCO ₂ e /M€ | 158,6 tCO ₂ e /M€ | The portfolio included in 2023 is roughly triple in value compared to 2022, therefore such gross differences in indicators | INTERAMERICAN will monitor the progress of this indicator and consider possible measures to improve it. |

| | | | | | | |
|--|---|---|-------------------------------------|-------------------------------------|---|---|
| | | | | | presented as absolute numbers are expected. | |
| | 3. GHG intensity of investee companies | GHG intensity of investee companies | 129,50 tCO ₂ /M€ revenue | 151,64 tCO ₂ /M€ revenue | Although the portfolio included in 2023 is roughly triple in value compared to 2022, this indicator is calculated on the basis of total investments (denominator) which has likewise increased significantly. | INTERAMERICAN will monitor the progress of this indicator and consider possible measures to improve it. |
| | 4. Exposure to companies active in the fossil fuel sector | Share of investments in companies active in the fossil fuel sector | 30,62% | 27,21% | INTERAMERICAN follows the Group guidelines regarding the exclusion from investment of certain entities and sectors. Furthermore, the make-up of the sectors included in the portfolio is relatively standard, thus no significant differences are noted year-on-year on proportionate (not absolute number) indicators. | INTERAMERICAN will monitor the progress of this indicator and consider possible measures to improve it. |
| | 5. Share of non-renewable energy consumption and production | Share of non-renewable energy consumption of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources | 65,93% | 69,61% | INTERAMERICAN follows the Group guidelines regarding the exclusion from investment of certain entities and sectors. Furthermore, the make-up of the sectors included in the portfolio is relatively standard, thus no significant differences are noted year-on-year on proportionate (not absolute number) indicators. | INTERAMERICAN will monitor the progress of this indicator and consider possible measures to improve it. |
| | | Share of non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources | 73,10% | 84,63% | Same as the above indicator. | INTERAMERICAN will monitor the progress of this indicator and consider possible measures to improve it. |

| | | | | | | |
|---|---|--|-------------|-------------|--|---|
| | 6. Energy consumption intensity per high impact climate sector | Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector | 0,46 GWh/M€ | 0,69 GWh/M€ | Investment in companies with high energy consumption in GWh per million EUR of revenue was slightly reduced in 2023. | INTERAMERICAN will monitor the progress of this indicator and consider possible measures to improve it. |
| Biodiversity | 7. Activities negatively affecting biodiversity-sensitive areas | Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas | 65,09% | 1,42% | Change due to data provider's change in calculation method. | The aim is to maintain the index at low levels until its annihilation. |
| Water | 8. Emissions to water | Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average | 0,07 t/M€ | 0,11 t/M€ | Although the portfolio included in 2023 is roughly triple in value compared to 2022, this indicator is calculated on the basis of total investments (denominator) which has likewise increased significantly. | The aim is to maintain the index at low levels until its annihilation. |
| Waste | 9. Hazardous waste and radioactive waste ratio | Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average | 2,06 t/M€ | 0,87 t/M€ | Although low availability of information in this indicator continues to pose a challenge, the amount of portfolio companies reporting such information increased in 2023. | INTERAMERICAN will monitor the progress of this indicator and consider possible measures to improve it. |
| INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS | | | | | | |
| Social and employee matters | 10. Violations of UN Global Compact principles and Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises | Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises | 11,06% | 18,53% | The share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises remained relatively stable, as the investee companies are vetted through internal procedures described in the PAI statement and the ones more susceptible to such violations are avoided. | INTERAMERICAN will monitor the progress of this indicator and consider possible measures to improve it. |

| | | | | | |
|--|--|---------------|---------------|---|--|
| <p>11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises</p> | <p>Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance/complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises</p> | <p>0%</p> | <p>27,96%</p> | <p>Change due to data provider's change in calculation method.</p> | <p>INTERAMERICAN will monitor the progress of this indicator and consider possible measures to improve it.</p> |
| <p>12. Unadjusted gender pay gap</p> | <p>Average unadjusted gender pay gap of investee companies</p> | <p>21,38%</p> | <p>21,09%</p> | <p>The average unadjusted gender pay gap of investee companies remained relatively stable, as the investee companies are vetted through internal procedures described in the PAI statement and the ones deemed more susceptible to such phenomena are avoided.</p> | <p>INTERAMERICAN will monitor the progress of this indicator and consider possible measures to improve it.</p> |
| <p>13. Board gender diversity</p> | <p>Average ratio of female to male board members in investee companies, expressed as a percentage of all board members</p> | <p>41,35%</p> | <p>66,32%</p> | <p>Although low availability of information in this indicator continues to pose a challenge, the amount of portfolio companies reporting such information increased in 2023. Thus, since most companies have a ratio below 1:1, the more information available, the more the indicator value decreases.</p> | <p>INTERAMERICAN will monitor the progress of this indicator and consider possible measures to improve it.</p> |
| <p>14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)</p> | <p>Share of investments in investee companies involved in the manufacture or selling of controversial weapons</p> | <p>0%</p> | <p>0%</p> | <p>INTERAMERICAN follows the Group guidelines regarding the exclusion from investment of certain entities and sectors. Furthermore, the makeup of the sectors included in the portfolio is relatively standard, thus no significant differences are noted year-on-year</p> | <p>The aim is to maintain the index at low levels until its annihilation.</p> |

| | | | | | on proportionate (not absolute number) indicators. This specific sector is marked in the investment exclusion list of Achmea Group. | |
|--|---|---|---------------------------------|---------------------------------|--|---|
| Indicators applicable to investments in sovereigns and supnationals | | | | | | |
| Adverse sustainability indicator | | Metric | Impact 2023 | Impact 2022 | Explanation | Actions taken, and actions planned and targets set for the next reference period |
| Environmental | 15. GHG intensity | GHG intensity of investee countries | 261,03 tCO ₂ /M€ GDP | 255,38 tCO ₂ /M€ GDP | Despite the general increase in indicator values due to the inclusion of more portfolios in 2023 than in 2022, investments in sovereigns follow very specific guidelines, and in this case, the new portfolios included investments in the same sovereign entities. As such, the difference remained relatively minor. | INTERAMERICAN will monitor the progress of this indicator and consider possible measures to improve it. |
| Social | 16. Investee countries subject to social violations | Absolute number of investee countries subject to social violations, as referred to in international treaties and conventions, United Nations principles and, where applicable, national law | 0 | 0 | No investment has been made in countries subject to social violations, as referred to in international treaties and conventions, United Nations principles and, where applicable, national law. | The aim is to maintain the index at low levels until its annihilation. |
| | | Relative number of investee countries subject to social violations, as referred to in international treaties and conventions, United Nations principles and, where applicable, national law | 0% | 0% | No investment has been made in countries subject to social violations, as referred to in international treaties and conventions, United Nations principles and, where applicable, national law. | The aim is to maintain the index at low levels until its annihilation. |
| Indicators applicable to investments in real estate assets | | | | | | |
| Adverse sustainability indicator | | Metric | Impact 2023 | Impact 2022 | Explanation | Actions taken, and actions planned and targets set for the next reference period |

| | | | | | | |
|-------------------|---|--|------|------|--|---|
| Fossil fuels | 17. Exposure to fossil fuels through real estate assets | Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels | 0% | 0% | There are no investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels as per applicable Group guidelines. | The aim is to maintain the index at low levels until its annihilation. |
| Energy efficiency | 18. Exposure to energy-inefficient real estate assets | Share of investments in energy-inefficient real estate assets | 100% | 100% | Currently, all real estate assets of IAG are categorized in this category and no new investments were made in 2023. | INTERAMERICAN will monitor the progress of this indicator and consider possible measures to improve it. |

Other indicators for principal adverse impacts on sustainability factors

Table 2

Additional climate and other environment-related indicators

| Adverse sustainability impact | Adverse impact on sustainability factors (qualitative or quantitative) | Metric | Impact 2023 | Impact 2022 | Explanation | Actions taken, and actions planned and targets set for the next reference period |
|--------------------------------------|---|---------------|--------------------|--------------------|--------------------|---|
|--------------------------------------|---|---------------|--------------------|--------------------|--------------------|---|

Indicators applicable to investments in investee companies

CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

| | | | | | | |
|-------------------------------------|---|--|----|----|---|--|
| Water, waste and material emissions | 9. Investments in companies producing chemicals | Share of investments in investee companies the activities of which fall under Division 20.2 of Annex I to Regulation (EC) No 1893/2006 | 0% | 0% | Currently, no investments in companies producing chemicals. | The aim is to maintain the index at low levels until its annihilation. |
|-------------------------------------|---|--|----|----|---|--|

Table 3

Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS

| Adverse sustainability impact | Adverse impact on sustainability factors (qualitative or quantitative) | Metric | Impact 2023 | Impact 2022 | Explanation | Actions taken, and actions planned and targets set for the next reference period |
|--------------------------------------|---|---------------|--------------------|--------------------|--------------------|---|
|--------------------------------------|---|---------------|--------------------|--------------------|--------------------|---|

Indicators applicable to investments in investee companies

| | | | | | | |
|-----------------------------|--------------------------------|---|------|------|--|--|
| Social and employee matters | 1. Incidents of discrimination | 1. Number of incidents of discrimination reported in investee companies | 0,36 | 0,37 | The number of incidents of discrimination reported in investee companies remained relatively | The aim is to maintain the index at low levels until its annihilation. |
|-----------------------------|--------------------------------|---|------|------|--|--|

| | | | | | | | |
|--|----------------------------------|---|---|--------|---|--|---|
| | | expressed as a weighted average | | | stable, as the investee companies are vetted through internal procedures described in the PAI statement and the ones more susceptible to such violations are avoided. | | |
| | | 2. Number of incidents of discrimination leading to sanctions in investee companies expressed as a weighted average | 0,04 | 0,04 | Same as the above indicator. | The aim is to maintain the index at low levels until its annihilation. | |
| | Human Rights | 14. Number of identified cases of severe human rights issues and incidents | Number of cases of severe human rights issues and incidents connected to investee companies on a weighted average basis | 1,91% | 0 | There was a single entity in the portfolio that recorded cases of severe human rights issues and incidents connected to investee companies on a weighted average basis. | The aim is to maintain the index at low levels until its annihilation. |
| | Anti-corruption and anti-bribery | 16. Cases of insufficient action taken to address breaches of standards of anti-corruption and anti-bribery | Share of investments in investee companies with identified insufficiencies in actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery | 20,65% | 8,94% | Investee companies with no previously identified insufficiencies in actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery recorded more insufficiencies in 2023. | INTERAMERICAN will monitor the progress of this indicator and consider possible measures to improve it. |

Description of policies to identify and prioritise principal adverse impacts on sustainability factors

Achmea Group, and by extension the Company, applies a due diligence policy to identify, prioritize and evaluate the principal adverse impacts of investment decisions on sustainability factors. In addition, INTERAMERICAN checks whether the activities comply with international standards, such as the "Global Compact" initiative of the United Nations Organization (UN Global Compact), the guidelines of the Organization for Economic Cooperation and Development for multinational enterprises (OECD Guidelines for MNEs) as well as the guiding principles of the United Nations Organization for business and human rights (UN Guiding Principles on Business and Human Rights). In particular, it checks whether human rights, labor and environmental standards and anti-corruption and anti-bribery rules are being violated.

As far as corporate bonds are concerned, the choice is based on the examination of the reason for issuing the bonds and the way in which the funds are used by the respective issuer. Priority is given to bonds characterized as "green" and aimed at the implementation of projects concerning renewable energy sources, energy efficiency, green buildings, prevention and e-control of pollution, environmentally sustainable management of natural resources and land use, as well as the efficient management of water resources. In addition, considering the selection of new bond securities to be included in the portfolio, INTERAMERICAN implements an exclusion policy for issuers or financing projects that contradict its corporate policy and philosophy.

Based on the 10 Principles of the UN Global Compact, INTERAMERICAN excludes indicative industries or investment characteristics related to munitions, chemical, biological and nuclear weapons, mines, tobacco industries, alcohol production, thermal coal release, sand construction tar or other environmentally unfriendly practices, as well as lack of respect for human rights and corruption.

Information regarding the above sustainability indicators is collected with the support of Moody's ESG tool regarding investments in companies, as well as investments in state and supranational entities. In the portfolio, in which INTERAMERICAN covers investments in companies, Moody's is unable to cover data and information for two Greek and two international companies. The specific issue has been discussed extensively with the data provider, who has committed to trying to include the data in a subsequent report. Regarding investments in real estate, the necessary data is available from INTERAMERICAN.

Engagement policies

The majority of INTERAMERICAN's portfolio is placed in highly rated government bonds based in the European Union. For this reason, common actions such as the open dialogue with companies to try to shift to more sustainable practices, do not have extensive application for the Company. However, INTERAMERICAN, as part of Achmea Group abides by the engagement approach implemented by the Group as a whole. Specifically, Engagement in Achmea is divided into two separate programmes: i) Normative engagement and ii) Thematic engagement.

Normative engagement

The aim of the normative engagement programme is to stop or prevent structural violations of international standards. It is not hard to foresee direct and indirect financial impacts deriving from such violations, and as such, Achmea is engaged in open dialogue with subject companies to attempt to mitigate any potential cases. If the company fails to stop violating standards and is no longer open to dialogue, it may be excluded from investment and placed on the exclusion list, which is applicable to all Group entities, including INTERAMERICAN.

Thematic engagement

The focus of the thematic engagement is not on companies that violate standards (as above) but on companies that can improve their financial and social performance on specific themes. Engagement is conducted in those themes that are aligned with Achmea's key themes. The current engagements vary from good and accessible medicine, climate and biodiversity to healthy food. The basis for conducting such engagements is found in Achmea's Engagement Guidelines which take into account international treaties and initiatives to formulate a suitable approach. Achmea applies an escalation strategy in the event that an engagement with a company from the engagement programmes makes insufficient progress. Once some time has elapsed and after several escalation steps have failed to yield sufficient results, the company may be excluded from investment (at Group level).

References to international standards

INTERAMERICAN's commitment to sustainability is enhanced by the Company's long-standing commitment to key industry initiatives.

Since 2008, as a founding member of the competent body in Greece, INTERAMERICAN is committed to incorporating the 10 Principles of the UN Global Compact in its policies and procedures, while since 2019 it is also a founding member of the representative body of Compact in Greece, Global Compact Network Hellas.

Committed to running a responsible organization, the Company participates in the UN Environment Program Finance Initiative, having also signed the Principles for Sustainable Insurance (PSI UNEPFI). At the same time, it participates in the Greek Code of Sustainability, which is a structured reference system in terms of the transparency and self-commitment of organizations in matters of sustainable development and responsible entrepreneurship. Based on this system, the Company is ranked among the "most sustainable companies".

Finally, it is noted that the sustainability practices implemented in the Company are guided (directly or indirectly) by the 17 UN Sustainable Development Goals (UN SDGs).

Historical comparison

This document, as mentioned above, constitutes the Statement on the principal adverse impacts of investment decisions on sustainability factors and examines the period from January 1 to December 31, 2023. In comparison with the previous implementation period, INTERAMERICAN proceeded in the amalgamation of its two individual portfolios as a result of the merger of the Life and Non-Life companies. This change resulted in a virtual tripling (3x) of the market value of the portfolio represented in the present statement. For this reason, some differences between the indicators of the two comparative periods are presented.

Remaining faithful to its commitment to provide accurate and meaningful information, INTERAMERICAN makes every effort to gather more information on the principal adverse impacts of investment decisions on sustainability factors and to reassess the situation. The limitations of data are attributed both to the absence of relevant data from the managers of the portfolios in scope and to their limited availability, despite our efforts to collect the necessary data and negotiations with the relevant mutual fund management companies as a no look through approach is applied. As the availability of information provided by mutual fund management companies increases and the quality of the information made available improves, it is expected that the indicators in this statement will gradually be more influenced by the investment decisions and strategies of the owners of life insurance products. linked to investments (Unit-Linked).