## FY23 EU Taxonomy Disclosures

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#### 1. EU Taxonomy Regulation

In line with AIG's Group purpose and values, the following paragraphs provide information on the requirements of **Regulation (EU) 2020/852**<sup>1</sup> on the establishment of a framework to facilitate sustainable investment and its delegated acts on sustainable activities for climate change mitigation and adaptation, sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control and protection and restoration of biodiversity and ecosystems objectives (the "EU Taxonomy").

The Group fully understands that leading in the uncharted waters of the greatest transition in history towards a more sustainable economy is to lead in the face of many unknown factors, challenging us to bring to bear the expertise and skills that make AIG the global market leader that it is. We recognize there are risks, but also enormous rewards to being a catalyst for positive change.

AIG Europe SA being subject to Article 8(1) of the Taxonomy Regulation, should disclose information to the public on how and to what extent our activities are associated with environmentally sustainable economic activities as defined under the EU Taxonomy legislation.

With this in mind, AIG Europe SA prepared FY23 EU Taxonomy Disclosures, leveraging on the work performed for FY22. Under the EU Taxonomy, AIG Europe SA has assessed, for financial year 2023, the proportion of EU Taxonomy eligible, non-eligible, aligned and non-aligned non-Life insurance and investments in economic activities, in accordance with the EU Taxonomy Technical Screening Criteria (TSC) for climate change adaptation for non-life insurance and Technical Screening Criteria for climate change adaptation and mitigation for investments. In addition, AIG Europe SA has evaluated, for the very first time, the proportion of EU Taxonomy eligible and non-eligible investments in economic activities, in accordance with the EU Taxonomy Technical Screening Criteria for sustainable use and protection of water and marine resources, transition to a circular economy pollution prevention and control, protection and restoration of biodiversity and ecosystems Technical Screening Criteria, adopted in June 2023<sup>2</sup>.

As a matter of fact, the EU Taxonomy Regulation introduces two key concepts:

- 1. **TAXONOMY ELIGIBLE**: an economic activity is said to be eligible if it is identified in the delegated acts as having a high potential to contribute to at least one of the six environmental objectives, irrespective of whether the activity meets the technical criteria set out in those delegated acts.
- TAXONOMY ALIGNED: the second of these concepts is alignment, which confirms the significant
  contribution of this eligible economic activity to at least one of the six environmental objectives
  on the basis of technical criteria specified through a delegated regulation.

<sup>&</sup>lt;sup>1</sup> Regulation (EU) 2020/852: <u>EUR-Lex - 32020R0852 - EN - EUR-Lex (europa.eu)</u>

<sup>&</sup>lt;sup>2</sup> Commission Delegated Regulation (EU) 2023/2486: <a href="https://eur-lex.europa.eu/legal">https://eur-lex.europa.eu/legal</a> <a href="mailto:content/EN/TXT/?uri=CELEX:32023R2486">content/EN/TXT/?uri=CELEX:32023R2486</a>

#### 2. Focus on non-Life insurance economic activities

#### 2.1 EU Taxonomy assessment

The EU Taxonomy assessment has been designed with the purpose of reviewing certain economic activities undertaken in the reporting period by AIG, classified as insurance services (other than life insurance) as defined in Annex I of Commission Delegated Regulation (EU) 2015/35<sup>3</sup> of 10 October 2014 related to the underwriting of climate related perils set out in Appendix A to the Annex II to the Commission Delegated Regulation 2021/2139<sup>4</sup>, assessed against:

Delegated Regulation (EU) 2021/2139<sup>5</sup> of the European Commission of 4 June 2021 and Delegated Regulation (EU) 2023/2485<sup>6</sup> of 27 June 2023 amending Delegated Regulation (EU) 2021/2139 establishing additional technical screening criteria for determining the conditions under which certain economic activities qualify as contributing substantially to climate change mitigation or climate change adaptation and for determining whether those activities cause no significant harm to any of the other environmental objectives.

The assessment performed was focused on the activities connected to AIG's business model dealing with non-Life insurance services related to the underwriting of climate related perils as per Annex A mentioned above. Moreover, the assessment excluded reinsurance activities due to the complexity of the related analysis and a lack of data to support the completion of the assessment. Given that the coverage is set out in an agreement between insurer and reinsurer specifying the insurers' products from which the ceded risks originate, additional contractual agreements would have been necessary to review. Furthermore, the decision to omit reinsurance activities from the assessment was influenced by the fact that, in certain cases, a reinsurance intermediary was involved in the preparation or conclusion of the contractual agreement between the insurer and reinsurer.<sup>7</sup>

AIG relied on the NACE classification below for the identification, respectively, of the non-Life insurance:

- NACE code K65.12
- NACE code K65.20

<sup>&</sup>lt;sup>3</sup> Commission Delegated Regulation (EU) 2015/35: <u>EUR-Lex - 02015R0035-20220802 - EN - EUR-Lex (europa.eu)</u>

<sup>&</sup>lt;sup>4</sup> Commission Delegated Regulation 2021/2139: <u>taxonomy-regulation-delegated-act-2021-2800-annex-2 en.pdf</u> (europa.eu)

<sup>&</sup>lt;sup>5</sup> Commission Delegated Regulation (EU) 2021/2139: EUR-Lex - 02021R2139-20230101 - EN - EUR-Lex (europa.eu)

<sup>&</sup>lt;sup>6</sup> Commission Delegated Regulation (EU) 2023/2485: <u>Delegated regulation - EU - 2023/2485 - EN - EUR-Lex</u> (europa.eu)

<sup>&</sup>lt;sup>7</sup> AIG conducted discussions and determined that information for reinsurance activities was not available on account of reinsurance activity data being considered insufficient in depth and/or granularity. The disclosures have been prepared including information on data sources and limitations, in accordance with the recommendations of the Draft Commission Notice from December 2023: "Draft Commission Notice on the interpretation and implementation of certain legal provisions of the Disclosures Delegated Act under Article 8 of the EU taxonomy Regulation on the reporting of taxonomy-eligible and Taxonomy-aligned economic activities and assets" (europa.eu)

- **Delegated Regulation (EU) 2021/2178**<sup>8</sup> of the European Commission of 6 July 2021 and its annexes, namely **Annex IX, Annex X and Annex XI**, supplementing Regulation (EU) 2020/852 specifying respectively how to calculate the KPIs, the narrative information to be published and the qualitative disclosures to include for insurance undertakings.
- Delegated Regulation (EU) 2023/2486<sup>9</sup> of 27 June 2023 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to the sustainable use and protection of water and marine resources, to the transition to a circular economy, to pollution prevention and control, or to the protection and restoration of biodiversity and ecosystems and for determining whether that economic activity causes no significant harm to any of the other environmental objectives and amending Commission Delegated Regulation (EU) 2021/2178 as regards specific public disclosures for those economic activities.
- Delegated Regulation (EU) 2022/1214<sup>10</sup> of 9 March 2022 amending Delegated Regulation (EU) 2021/2139 and Delegated Regulation (EU) 2021/2178 and its Annex XII specifying the exposures to nuclear and fossil gas related activities.

Because of the above-mentioned regulations, AIG Europe SA applied an analytical methodology which involved definitions, assumptions, and specific calculations. A top-down assessment has been conducted in order to identify the EU Taxonomy eligible and aligned, non-eligible and non-aligned activities for FY23. Indeed, based on the EU Taxonomy categorization, AIG has identified the economic activities that matched the regulation's eligibility requirements first. Subsequently, the activities classified as eligible have been assessed as per the corresponding Technical Screening Criteria detailed in the Delegated Regulation (EU) 2021/2139 (commonly "Climate Delegated Act") to verify alignment. This second assessment verified, based on specific information and documentation for each eligible activity, the substantial contribution to one or more of the Climate objectives as per the above-mentioned Delegated Act. The eligible activities that passed the substantial contribution assessment underwent a Do No Significant Harm (DNSH) analysis to verify their eventual harm to one of more Climate or Environmental objectives. The DNSH assessment ensured that the insurance does not cover the extraction, storage, transport or manufacture of fossil fuels or insurance of vehicles, property or other assets dedicated to such purposes. Finally, to ensure compliance of the activities that passed all the above assessments with the Minimum Social Safeguards (MSS), policies and guidelines adopted by the Group were verified to comply with the requirements of the regulatory frameworks. This was done to maintain the alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organization on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

<sup>&</sup>lt;sup>8</sup> Commission Delegated Regulation (EU) 2021/2178 and its annexes, namely Annex IX, Annex X and Annex XI: <u>EUR-Lex - 02021R2178-20230101 - EN - EUR-Lex (europa.eu)</u>

<sup>9</sup> Commission Delegated Regulation (EU) 2023/2486: EU - 2023/2486 - EN - EUR-Lex (europa.eu)

<sup>&</sup>lt;sup>10</sup> Commission Delegated Regulation (EU) 2022/1214: <u>Delegated regulation - 2022/1214 - EN - EUR-Lex (europa.eu)</u>

#### 2.2 Non-life insurance EU Taxonomy-eligibility

The EU Taxonomy identifies eight (8) categories of non-Life insurance lines of business, which could potentially to contribute to climate change adaptation making them eligible under the Regulation, in case they include specific policy terms related to the underwriting of climate-related perils<sup>11</sup>: (a) medical expense insurance; (b) income protection insurance; (c) workers' compensation insurance; (d) motor vehicle liability insurance; (e) other motor insurance; (f) marine, aviation and transport insurance; (g) fire and other damage to property insurance; (h) assistance.

AIG Europe SA conducted the analysis on direct lines of business (LoBs) of non-life insurance. AIG Europe SA has identified 5 LoBs which are eligible under the EU Taxonomy<sup>12</sup>:

- 1. Medical expense insurance
- 2. Motor vehicle liability insurance
- 3. Other motor insurance
- 4. Marine, aviation and transport insurance
- 5. Fire and other damage to property insurance

The gross written premiums reported in relation to these lines of business have been classified as "EU Taxonomy Eligible".

The premiums of products for which climate-related perils are explicitly excluded from the insurance policy terms or for which climate-related perils cannot trigger any claims have not been considered in the current eligibility assessment.

In addition, please consider that AIG Europe SA currently excludes reinsurance LoBs from the current eligibility assessment due to the complexity of the related analysis and a lack of data to support the completion of the assessment. Hence, the reported eligibility percentage for FY23 is equal to 0% for such reinsurance activities.

#### 2.3 Non-life insurance EU Taxonomy-alignment

In the process of generating indicators for the financial year 2023, AIG Europe SA conducted an EU Taxonomy alignment assessment for its non-life insurance business. The purpose of this assessment is to identify non-life insurance activities substantially contributing to climate change adaptation without doing significant harm to the objective of climate change mitigation and complying with minimum safeguards. To obtain the proportion of Premiums associated with activities aligned with the EU Taxonomy, a comprehensive alignment evaluation was conducted on the total amount of eligible gross written premiums, drawing upon the EU Taxonomy Technical Screening Criteria for non-life insurance activities set out in Delegated Regulation (EU) 2021/2139 as follows:

- 1. Leadership in modelling and pricing of climate risks
- 2. Product design

<sup>11</sup> Ref. to Appendix A to the Annex to the Commission Delegated Regulation 2021/2139.

<sup>&</sup>lt;sup>12</sup> AIG screened all the eight categories of non-life insurance lines of business defined in the EU Taxonomy Regulation and identified five material lines of business. AIG conducted the EU Taxonomy alignment assessment based on these five lines of business.

- 3. Innovative insurance coverage solutions
- 4. Data sharing
- 5. High level of service in post disaster situation

AIG further screened the eligible premiums to ensure compliance with the Do No Significant Harm and Minimum Social Safeguards.

The assessments in this report are based on the Delegated Regulation (EU) 2021/2139, which defines a DNSH criteria for non-life insurance activities related to the EU Taxonomy climate change mitigation objective.

AIG verified that eligible non-life insurance activities did not include the insurance of extraction, storage, transport, or manufacture of fossil fuels, nor the insurance of vehicles, property, or other assets dedicated to such purposes.

Additionally, AIG ensured compliance with Minimum Social Safeguards to adhere to international minimum human and labor rights and standards, which are necessary for eligible non-life insurance activities to qualify as aligned according to the EU Taxonomy.

#### 2.4 Overall results of Non-life insurance EU Taxonomy Assessment

For the financial year 2023, we are reporting 0% of Taxonomy aligned revenues for non-life insurance activities. In our assessment, we have identified several gaps preventing us to conclude on the alignment for the eligible non-life insurance activities. Quality improvements, both in the data reported and in data collection, is expected over time related to improved taxonomy regulation interpretation, aligned usage of taxonomy tables.

#### 2.5 Non-life insurance Simplified Table

The table below simplifies the key percentages of exposures to EU Taxonomy eligible / aligned and EU Taxonomy non-eligible / non-aligned activities for non-life insurance business:

	Gross premium written (EUR)	% to Total non-life premiums
Climate Change Adaptation:		
Non-Life insurance activities eligible to EU Taxonomy	1 253 503,33	27,1%
Non-Life insurance activities not eligible to EU Taxonomy	3 372 994 154,29	72,91%
Non-Life insurance activities aligned to EU Taxonomy	0,00	0%
Non-Life insurance activities not aligned to EU Taxonomy	4 626 494 657,61	100%

#### 3. Focus on FY23 Investments

#### 3.1 Investments EU Taxonomy-eligibility

For FY23 investments covered by the KPI, AIG has performed an eligibility assessment across the 6 EU Taxonomy Environmental Objectives. For this evaluation, we have applied reasonable assumptions by categorizing as non-eligible issuers displaying no percentage of revenue substantially contributing to EU Taxonomy Environmental Objectives or having a workforce of fewer than 500 employees.

Our investment portfolio remained largely unchanged from FY22 to FY23. In FY22 we disclosed 1% eligibility. In FY23, after redefining our top-down assessment and due to data limitations related to our current MSCI license, we concluded that the eligible amount was below 1%. Consequently, we decided not to disclose an eligibility percentage for FY23.

#### 3.2 Investments EU Taxonomy-alignment

For FY23 investments, the focus of EU Taxonomy reporting is alignment for Climate Objectives. An investment is considered aligned when it substantially contributes to one or more environmental objectives in line with the Technical Screening Criteria, meets the Do No Significant Harm criterion and respects the minimum social safeguards defined by the Taxonomy.

For the calculation of Taxonomy alignment, the December 2023 Draft Commission Notice clarifies that in the absence of sufficient data and adequate evidence, financial undertakings are encouraged to leverage on estimates of Taxonomy-alignment, but adequate evidence should be used to prove Taxonomy-alignment.<sup>13</sup>

We executed an EU Taxonomy alignment assessment to obtain the proportion of investments associated with activities aligned with the EU Taxonomy Climate Objectives. We conducted the analysis of alignment with the EU Taxonomy on investments under our direct control. For this evaluation, we leveraged on estimated data from MSCI on issuers that corresponded with AESA investments. AIG further considered aligned all investments that were eligible and that passed the Do No Significant Harm and Minimum Safeguards assessment based on MSCI ESG Controversies Methodology. This allowed us to distinguish exposures to specific aligned, non-aligned yet eligible, and non-eligible economic activities, which we will further elaborate on in the subsequent Annex.

#### 3.3 Overall results of Investments EU Taxonomy Assessment

AIG has screened its investment portfolio and has obtained a 0% alignment for 2023. To perform the alignment assessment, AIG used a third-party provider (MSCI) that reports Sustainable Impact Metrics Subcategories designed to identify companies deriving revenues linked with one or more environmental objectives within the EU Taxonomy. AIG leveraged on estimated data and on the EU Taxonomy Alignment Methodology provided by MSCI to perform the alignment assessment of its investment portfolio.

Draft Commission Notice on the interpretation and implementation of certain legal provisions of the Disclosures

Delegated Act under Article; 8 of the EU taxonomy Regulation on the reporting of taxonomy-eligible and

Taxonomy-aligned economic activities and assets (europa.eu)

However, the outcome for the reported percentage of financial year 2023 is due to the lack of estimated data to which AIG had access to. AIG faced limitations as the MSCI estimated data for revenues linked with one or more environmental objectives does not offer a breakdown for each EU Taxonomy Objective. We continue to monitor the evolution of the EU Taxonomy regulation and we will consider using reported data at issuer level to improve the representation of alignment for FY24.

#### 3.4 Investments Simplified Table

The table below simplifies the key percentages of exposures to EU Taxonomy eligible / aligned and EU Taxonomy non-eligible / non-aligned investments directed at funding, or associated with, EU Taxonomy eligible or aligned/non-eligible or non-aligned economic activities relative to the value of total invested assets included for the purpose of the calculation of the KPI.

The Covered Assets correspond to all assets invested on the balance sheet (including cash), excluding exposures to central governments, central banks, and supranational issuers, in accordance with article 7.1 of the Commission Delegated Regulation (EU) 2021/2178<sup>14</sup>. The covered Assets thus include exposures to investments in, equity securities, debt instruments (excluding sovereign exposures), non-consolidated investment funds, derivatives, loans, cash, and cash equivalents. Assets backing contracts where the financial risk is borne by policyholders are also included.

Exposures to undertakings not subject to articles 19a and 29a of Directive 2013/34/EU<sup>15</sup> and derivatives cannot be assessed for Taxonomy eligibility so far.

	Value (EUR)	Percentage
Covered Assets	5 487 863 776,40	70,05%
Of which: Eligible	0	0%
Of which: Aligned	0	0%
Of which: Non-Aligned	0	0%
Of which: Non-Eligible	5 487 863 776,40	70,05%
Non-Covered Assets	2 346 051 854,30	29,95%
Total Investment	7 833 915 630,70	100%

<sup>&</sup>lt;sup>14</sup> Commission Delegated Regulation (EU) 2021/2178: EUR-Lex - 02021R2178-20230101 - EN - EUR-Lex (europa.eu)

<sup>&</sup>lt;sup>15</sup> Directive 2013/34/EU: EUR-Lex - 02013L0034-20230105 - EN - EUR-Lex (europa.eu)

# 4. Taxonomy eligibility and alignment of nuclear and fossil gas related activities

AIG has considered the additional requirements of **Delegated Regulation (EU) 2022/1214** with regards to the disclosures on nuclear and fossil gas related activities in Annex XII and the guidance from the **Draft Commission Notice of December 2023** to report on Taxonomy-eligible and Taxonomy-aligned economic activities and assets.

AIG has considered to be exposed through its investments to all activities related to fossil gas and nuclear energy. In the subsequent annexes on exposure to fossil gas and nuclear energy, we are pointing out that the current data limitations prevented us to report the detailed share of exposures to economic activities in energy sectors including fossil gas and nuclear according to Annex XII of the aforementioned Regulation. We will re assess our exposure to nuclear and fossil gas economic activities reported as either Taxonomy-aligned or Taxonomy-eligible in FY24 once we have improved the data coverage of our counterparties.

## Annex 1: Template for KPIs of Insurance and Reinsurance Undertakings (Annex X Disclosures Delegated Act)

	Sub	estantial contrib	oution to climate change adaptation		DNSH (Do No Significant Harm)					
Economic activities (1)	Absolute premiums, year t (2)	Proportion of premiums, year t (3)	Proportion of premiums, year t-1 (4)	Climate change mitigation (5)	Water and marine resources (6)	Circular economy (7)	Pollution (8)	Biodiversity and ecosystems (9)	Minimum safeguards (10)	
	EUR	%	%	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	
A.1. Non-life insurance and reinsurance underwriting Taxonomy-aligned activities (environmentally sustainable)	0	0	0	N	N	N	N	N	N	
A.1.1 Of which reinsured	0	0	0	N	N	N	N	N	N	
A.1.2 Of which stemming from reinsurance activity	0	0	0	N	N	N	N	N	N	
A.1.2.1 Of which reinsured (retrocession)	0	0	0	N	N	N	N	N	N	
A.2. Non-life insurance and reinsurance underwriting Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)	1 253 500 503,33	27,1%	26,9%	N	N	N	N	N	N	
B. Non-life insurance and reinsurance underwriting Taxonomy-non-eligible activities	3 372 994 154,29	72,9%	73,1%	N	N	N	N	N	N	
Total (A.1 + A.2 + B)	4 626 494 657,61	100%	100%	N	N	N	N	N	N	

# Annex 2: The proportion of the insurance or reinsurance undertaking's investments that are directed at funding, or are associated with, Taxonomy-aligned in relation to total investments (Annex X Disclosures Delegated Act)

The weighted average value of all the investments of insurance or reinsurance undertakings that are directed at	The weighted average value of all the investments of insurance or reinsurance undertakings that are
funding, or are associated with Taxonomy-aligned economic activities <b>relative to the value of total assets covered</b>	directed at funding, or are associated with Taxonomy-aligned economic activities, with following
by the KPI, with following weights for investments in undertakings per below:	weights for investments in undertakings per below:
Turnover-based: 0%	Turnover-based: 0,00
Capital expenditures-based: 0%	Capital expenditures-based: 0,00
The percentage of assets covered by the KPI relative to total investments of insurance or reinsurance undertakings	The monetary value of assets covered by the KPI. Excluding investments in sovereign entities.
(total AuM). Excluding investments in sovereign entities.	Coverage: 5 487 863 776 EUR
Coverage ratio: 70,05%	
Additional, complementary disclosures: breakdown of <b>denominator</b> of the KPI	
The percentage of derivatives relative to total assets covered by the KPI.	The value in monetary amounts of derivatives.
N/A	N/A
The proportion of exposures to financial and non-financial undertakings not subject to Articles 19a and 29a of	Value of exposures to financial and non-financial undertakings not subject to Articles 19a and 29a of
Directive 2013/34/EU over total assets covered by the KPI:	Directive 2013/34/EU:
For non-financial undertakings: N/A	For non-financial undertakings: N/A
For financial undertakings: N/A	For financial undertakings: N/A
The proportion of exposures to financial and non-financial undertakings from non-EU countries not subject to	Value of exposures to financial and non-financial undertakings from non-EU countries not subject to
Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:	Articles 19a and 29a of Directive 2013/34/EU:
For non-financial undertakings: N/A	For non-financial undertakings: N/A
For financial undertakings: N/A	For financial undertakings: N/A
The proportion of exposures to financial and non-financial undertakings subject to Articles 19a and 29a of	Value of exposures to financial and non-financial undertakings subject to Articles 19a and 29a of
Directive 2013/34/EU over total assets covered by the KPI:	Directive 2013/34/EU:
For non-financial undertakings: N/A	For non-financial undertakings: N/A

For financial undertakings: N/A	For financial undertakings: N/A
The proportion of <b>exposures to other counterparties over</b> total assets covered by the KPI:	Value of exposures to other counterparties:
N/A	N/A
The proportion of the insurance or reinsurance undertaking's investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policy holders, that are directed at funding, or are associated with, Taxonomy-aligned economic activities: N/A	Value of insurance or reinsurance undertaking's investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policy holders, that are directed at funding, or are associated with, Taxonomy-aligned economic activities: N/A
The value of all the investments that are funding <b>economic activities that are not Taxonomy-eligible</b> relative to the value of total assets covered by the KPI:  100%	Value of all the investments that are funding <b>economic activities that are not Taxonomy-eligible</b> : 5 487 863 776 EUR
The value of all the investments that are funding Taxonomy-eligible economic activities, <b>but not Taxonomy-aligned relative to the value of t</b> otal assets covered by the KPI:  0%	Value of all the investments that are funding Taxonomy-eligible economic activities, <b>but not</b> Taxonomy-aligned:  0 EUR
Additional, complementary disclosures: breakdown of <b>numerator</b> of the KPI	
The proportion of Taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles  19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:	Value of Taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles  19a and 29a of Directive 2013/34/EU:
For non-financial undertakings:	For non-financial undertakings:
Turnover-based: 0%	Turnover-based: 0 EUR
Capital expenditures-based: 0%	Capital expenditures-based: 0 EUR
For financial undertakings:	For financial undertakings:
Turnover-based: 0%	Turnover-based: 0 EUR
Capital expenditures-based: 0%	Capital expenditures-based: 0 EUR
The proportion of the insurance or reinsurance undertaking's investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policy holders, that are directed at funding, or are associated with, Taxonomy-aligned:  Turnover-based: 0%	Value of insurance or reinsurance undertaking's investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policy holders, that are directed at funding, or are associated with, Taxonomy-aligned:  Turnover-based: 0 EUR
Capital expenditures-based: 0%	Capital expenditures-based: 0 EUR
The proportion of <b>Taxonomy-aligned exposures to other counterparties in</b> over total assets covered by the KPI:	Value of <b>Taxonomy-aligned exposures to other counterparties</b> over total assets covered by the KPI:

Turnover-based: 0%		Turnover-based: 0 EUR				
Capital expenditures-based: 0%		Capital expenditures-based: 0 EUR				
Breakdown of the numerator of the KPI per environmental objective						
Taxonomy-aligned activities – provided 'do-not-significant-harm'(DNSH) and social safeguards positive assessment:						
(1) Climate change mitigation	Turnover: 0%	Transitional activities: N/A				
	CapEx: 0%	Enabling activities: N/A				
(2) Climate change adaptation	Turnover: 0%	Transitional activities: N/A				
	CapEx: 0%	Enabling activities: N/A				
(3) The sustainable use and protection of water and marine resources	Turnover: 0%	Transitional activities: N/A				
	CapEx: 0%	Enabling activities: N/A				
(4) The transition to a circular economy	Turnover: 0%	Transitional activities: N/A				
	CapEx: 0%	Enabling activities: N/A				
(5) Pollution prevention and control	Turnover: 0%	Transitional activities: N/A				
	CapEx: 0%	Enabling activities: N/A				
(6) The protection and restoration of biodiversity and ecosystems	Turnover: 0%	Transitional activities: N/A				
	CapEx: 0%	Enabling activities: N/A				

## Annex 3: Nuclear and fossil gas related activities (Annex XII Disclosures Delegated Act)

Row	Nuclear energy related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	YES
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	YES
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	YES
	Fossil gas related activities	•
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	YES
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	YES
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	YES

## Annex 4: Taxonomy-aligned economic activities (denominator) (Annex XII Disclosures Delegated Act)

		Amount and Proportion (the information is to be presented in monetary amounts and as percentages) – Turnover based							
Row	Economic activities	CCM + C	CCM + CCA				te change ation (CCA)		
		Amount (€)	%	Amount (€)	%	Amount (€)	%		
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0, 0.0%	)	0, 0.0%	1	0, 0.0%	<u> </u>		
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0, 0.0%	)	0, 0.0%		0, 0.0%			
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0, 0.0%	, )	0, 0.0%		0, 0.0%			
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0, 0.0%	, )	0, 0.0%		0, 0.0%			
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0, 0.0%	,	0, 0.0%		0, 0.0%			
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0, 0.0%	)	0, 0.0%		0, 0.0%			
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	0, 0.0%	)	0, 0.0%		0, 0.0%			
8.	Total applicable KPI	0	100%	0		0			

## Annex 5: Taxonomy-aligned economic activities (numerator) (Annex XII Disclosures Delegated Act)

		Amount and Proportion (the information is to be presented in monetary amounts and as percentages) – Turnover based							
Row	Economic activities	(CCM+C	(CCM+CCA)			limate change adaptation			
		Amount (€)	%	Amount (€)	%	Amount (€)	%		
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0, 0.0	%	0, 0.0%		0, 0.0%			
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0, 0.0	%	0, 0.0%		0, 0.0%			
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0, 0.0	%	0, 0.0%		0, 0.0%			
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0, 0.0	%	0, 0.0%		0, 0.0%			
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0, 0.0	%	0, 0.0%		0, 0.0%			
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0, 0.0	%	0, 0.0%		0, 0.0%			
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	0, 0.0	%	0, 0.0%		0, 0.0%			
8.	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	0	100 %	0		0			

## Annex 6: Taxonomy-eligible but not taxonomy-aligned economic activities (Annex XII Disclosures Delegated Act)

				the information is a as percentages) –	•		tary
Row	Economic activities	(CCM+CCA)		Climate chang mitigation	Climate change Climate mitigation adapt		_
		Amount (€)	%	Amount (€)	%	Amount (€)	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0, 0.0%		0, 0.0%		0, 0.0%	
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0, 0.0%		0, 0.0%		0, 0.0%	
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0, 0.0%		0, 0.0%		0, 0.0%	
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0, 0.0%		0, 0.0%		0, 0.0%	
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0, 0.0%		0, 0.0%		0, 0.0%	
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0, 0.0%		0, 0.0%		0, 0.0%	
7.	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	0, 0.0%		0, 0.0%		0, 0.0%	
8.	Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	0	100%	0, 0.0%		0, 0.0%	

## Annex 7: Taxonomy non-eligible economic activities (Annex XII Disclosures Delegated Act)

Row	Economic activities	Amount Turnover- based (€)	Percentage Turnover-based
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
2.	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
3.	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
4.	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
5.	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
6.	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
7.	Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	0	0%
8.	Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI	5 487 863 776	100%