

OCTIUM

SRD2 – Shareholder Rights Directive II

Disclosure in accordance with Directive (EU) 2017/828 of the European Parliament and of the Council of 17 May 2017 amending Directive 2007/36/EC as regards the encouragement of long-term shareholder engagement (SRD2).

Octium Assurance AG is a Liechtenstein domiciled life insurance company, with an Italian branch, which offers unit-linked policies to its clients.

Octium Assurance AG appoints external asset managers for the discretionary management of the assets invested in through the policies. The discretionary management follows the investment strategy chosen by each policy holder, who bears the risk of the investment performance. The management of the investments is made within the limits set out in each specific insurance policy. Therefore, the adoption of an Equity Investment Strategy is not applicable to Octium Assurance AG, since it is not directly involved in the investment decisions taken by the external asset managers, who are following the investment strategy chosen by the policy holders.

Octium Assurance AG enters into Asset Management Agreements (AMAs) with the appointed external asset managers. The AMAs describe the framework for the management of the assets underlying each life insurance policy. Each AMA defines different investment strategies with corresponding risk profiles, which are available to the policy holders and chosen by them to be applicable to their insurance policy assets. As a consequence, external asset managers do not align the management of the assets to Octium Assurance AG's financial structure or governance, as they only manage the policy according to the strategy chosen by the policy holders. Octium Assurance AG is not directly involved in the investment decisions taken by the external asset managers, who discretionary manage the policy according to the strategy chosen by the policy holder. Octium Assurance AG does not monitor the corporate governance or capital structure of listed investee companies. There is no link between the performance of the external asset managers and the profile or duration of the liabilities of Octium Assurance AG as an institutional investor, since external asset managers only manage the unit-linked portfolio of the insurance company. Octium Assurance AG monitors neither turnover costs nor the number of transactions incurred by the external asset managers. The AMAs between Octium Assurance AG and each external asset managers do not have fixed termination dates.

Octium Assurance AG does not monitor investee companies on SRD2 relevant matters, including strategy, financial and non-financial performance and risk, capital structure, social and environmental impact and corporate governance. Also, Octium Assurance AG does neither conduct dialogues with investee companies, nor exercise voting rights and other rights attached to shares, etc..., as the investment decisions are delegated to the appointed external asset managers. Consequently, Octium Assurance AG does not formulate or publish an Engagement policy, as defined in SRD2.