

# OCTIUM

## SUSTAINABLE FINANCE DISCLOSURE REGULATION

The following disclosure statement relates to Octium Life DAC

Octium Life DAC (Octium) is required to provide specific disclosures under Regulation (EU) 2019/2088 of the European Parliament and of the Council (the "SFDR") regarding how it incorporates sustainability risks into its investment decision-making process and how it takes into account adverse impacts of its investment decisions on sustainability-related factors. An environmental, social, or governance occurrence or circumstance is referred to as a sustainability risk if it has the potential to have a materially negative impact on the investment's value. Sustainability aspects include issues relating to the environment, society, and employees, respect for human rights, and efforts to combat corruption and bribery.

Octium does not take an active role in policyholder investments with regard to its investment-based insurance products; it neither makes investment choices on behalf of policyholders nor recommends or provides advice on the choice of assets.

**Accordingly, Octium does not consider any adverse impacts of its investment decisions on sustainability factors.**

The policyholder, or their adviser, is responsible for making the investment decision and formulating the best investment strategy in cases where Octium gives the policyholder the option to direct the investment choice on a product, either through a list of funds approved by Octium or on an "open architecture" basis. Corresponding to this investment decision, Octium makes investments in the underlying securities.

A variety of licensed discretionary asset managers may be chosen to handle Octium's investments, when those investments are managed on a discretionary basis. Rarely, Octium may employ an investment adviser to provide advice on selecting investments in line with a policyholder's desired investment plan; who make sure that investment decisions or recommendations are in line with the risk profiles and investment objectives of Octium's policyholders.

As a result, Octium relies on its designated asset managers to actively interact with the investee firms in its portfolios.

A "standard" investment strategy that policyholders may choose may be established by Octium or described by it. However, Octium will assign its designated discretionary asset manager to manage the portfolio for that strategy or, in a select few instances, employ an investment adviser to provide portfolio management advice.

Therefore, Octium does not take sustainability risk into account when making investment decisions or take into account the negative effects of investment decisions on sustainability factors.

To learn how sustainability risk and sustainability factors may be incorporated into their investing selections, clients should speak with their professional advisers.

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