Disclosure pursuant to articles 3, 4 and 5 of Regulation (EU) 2019/2088 (Disclosure Regulation or Sustainable Finance Disclosure Regulation - "SFDR").

Preliminary remark:

This disclosure applies to swisspartners Versicherung AG (swisspartners) in its role as a financial market participant as well as in its role as a financial advisor.

Disclosure on the handling of sustainability risks (Art. 3 SFDR)

The EU Regulation "sustainability-related disclosure requirements in the financial services sector" entered into force on March 10, 2021. It forms part of the EU action plan with the goal of sustainable finance, which aims, among other things, to achieve the specifications and target values of the Paris Climate Agreement. Sustainability and the transition to a secure, climate-neutral, climate-smart, more resource-efficient and more circular economy are central to ensuring the long-term competitiveness of the EU economy.

The sustainability strategy of swisspartners includes the consideration of legal requirements resulting from ESG issues. This includes, among other things, education regarding the handling of sustainability risks in the context of swisspartners' services.

Sustainability risks and the adverse impact of investment decisions on sustainability factors are not integrated into the advice provided by swisspartners. This is due to the fact that swisspartners only offers advice on the insurance product (unit-linked life insurance). This advice does not contain any information on sustainability risks, as the customer chooses the investment strategy as well as the assets himself.

What is sustainability?

Sustainability risks are defined in Art. 2 (22) SFDR as "an environmental, social or governance event or condition, the occurrence of which could have an actual or potential material adverse effect on the value of the investment."

Sustainability factors are divided into three categories:

- **E**nvironment
- **S**ocial
- Corporate **G**overnance

They can be macroeconomic in nature or directly related to a company's activities.

Macroeconomic sustainability factors include physical climate risks such as global warming and the resulting extreme weather events such as storms or floods. They also include the so-called transition risks associated with the transition to a low-carbon economy. For example, policies such as a carbon tax on fossil fuels may favor manufacturers of alternative propulsion systems. Sustainability factors that relate to a company's activities can include environmentally friendly production, compliance with basic labor rights, or measures to prevent corruption.

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Responsible investment

swisspartners considers sustainable investing to be an important principle. We believe that taking ESG risks into account in the investment process can lead to a better risk-return profile in the long term, as this ensures clients a long-term and efficient strategy.

Responsible products

Under unit-linked life insurance for the account and risk of the policyholder, the policyholder chooses investment funds or standardized investment strategies. The policyholder alone decides whether and to what extent ESG risks should be taken into account. Upon customer request, we consider environmental, social and governance (ESG) criteria in our investments.

Disclosure of adverse sustainability impacts at the company level (Art. 4 SFDR).

Article 4 of the SFDR requires financial market participants to provide transparent information about adverse sustainability impacts at the corporate level.

swisspartners currently does not consider relevant adverse impacts of investment decisions on sustainability factors, i.e. adverse impacts of ESG risks, in particular on environmental, social and employee concerns, respect for human rights and the fight against corruption and bribery (so-called "Principal Adverse Impacts") at the level of the company.

The reason for this is the currently existing considerable legal uncertainties (Regulatory Technical Standards) regarding the concrete requirements for the measurement and disclosure of Principal Adverse Impacts (both at company and product level). Accordingly, swisspartners has decided to wait for further legal developments and to introduce corresponding processes at a later stage.

Disclosure of remuneration policy taking into account sustainability risks (Art. 5 SFDR)

The remuneration policy of swisspartners evaluates the performance of employees taking into account qualitative and quantitative performance targets. The compensation system is designed in such a way that it does not encourage the assumption of excessive risks, avoids conflicts of interest and promotes the sustainable success of the company. In this context, the consideration of sustainability aspects within the framework of the compensation system currently has no influence on managers and employees.

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