



Sustainable investments
and insurance



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RELEVANT ISSUES

Sustainability-conscious investments	158
Sustainable insurance	165

RELEVANCE OF ISSUES AND MAIN IMPACTS

The global financial system has established among its objectives to channel necessary resources towards an economy that fully respects the climate and the environment, by directing capital flows towards sustainability-conscious activities and thus decisively influencing the future of the planet.

The European Union, also with a view to long-term competitiveness, has adopted a series of measures to direct capital flows towards sustainability-conscious investments, to integrate ESG aspects in risk management and to promote transparency and long-term vision in economic and financial activity; to this end, the reference regulatory framework has been expanded by the European legislator through a series of provisions⁽¹⁾ that regulate the activity in investment processes and customer information and that guide the Group's commitment in tracing an increasingly incisive path towards global common objectives, also through an increasingly wide range of investments that include sustainability and of insurance solutions for customer protection, and thanks to enhanced advisory services from an ESG perspective to promote greater customer awareness about the issue.

The Intesa Sanpaolo Group is conscious of the change in progress and has integrated ESG factors into its investment process, aiming to promote economically and socially sustainable development and to contribute positively to the financial results of customer portfolios, while at the same time reducing their risks. This commitment also intends to avoid potential negative impacts on the environment, economy and people, including human rights, caused by a failure to consider the principles of sustainability in connection with insurance and investment services.

PERFORMANCE INDICATORS, RESULTS ACHIEVED AND OBJECTIVE

Macro-issue	Projects/Indicators	2023 Actions/Results	Plan Objectives for 2025 2022-2025 cumulative value
Sustainability-conscious investments	Funds pursuant to SFDR	<ul style="list-style-type: none"> ■ Eurizon offers a diverse range of 306 products in all the asset classes⁽²⁾ that include a focus on environmental and/or social issues, or have sustainable investment objectives, classified according to Articles 8 and 9 of the Sustainable Finance Disclosure Regulation - SFDR, with ~149.0 billion euro of assets representing around 73.3%⁽³⁾ of the total assets of the Funds managed. ■ Fideuram offers 97 funds classified pursuant to Articles 8 and 9 of the SFDR for a total of 33.3 billion euro of assets (71% of total assets under management). 	Strengthening of the ESG offering in Asset management ⁽⁴⁾ ; growth of assets under management invested in ESG products to 156 billion euro in 2025 from 110 billion euro in 2021, increasing their level as a proportion of total assets under management from 46% to 60%

⁽¹⁾ Regulation (EU) 2019/2088 (Sustainable Finance Disclosure Regulation) which governs disclosure in the field of sustainable finance, Regulation (EU) 2020/852 (so-called Taxonomy Regulation) on the establishment of a framework for the classification of activities considered sustainable, the Delegated Regulation (EU) 2021/1253 relating to the integration of customers' sustainability preferences by investment firms, Delegated Directive (EU) 2021/1269 referring to the integration of sustainability factors into the product governance obligations and Delegated Regulation (EU) 2022/1288 concerning the content and presentation of investment sustainability information.

⁽²⁾ UCITS (Undertaking for the Collective Investment in Transferable Securities).

⁽³⁾ About 74% including Portfolio Management (GP) pursuant to Articles 8 and 9 of the SFDR.

⁽⁴⁾ Eurizon perimeter – UCITS and Portfolio Management pursuant to Articles 8 and 9 SFDR 2008.

PERFORMANCE INDICATORS, RESULTS ACHIEVED AND OBJECTIVE

Macro-issue	Projects/Indicators	2023 Actions/Results	Plan Objectives for 2025 2022-2025 cumulative value
Sustainability-conscious investments		<ul style="list-style-type: none"> ■ The figure of “ESG Ambassador” was established: for the first phase, 34 Private Bankers were selected from among the approximately 6,000 members of the Fideuram and Intesa Sanpaolo Private Banking Networks based on their attention to ESG issues – with the aim of promoting the culture of sustainability in the areas they belong to. 	Development of dedicated ESG advisory services for Fideuram, including through the provision of specific training to financial advisors
	Engagement activities with issuers ⁽⁶⁾	<ul style="list-style-type: none"> ■ Eurizon conducted 592 engagement activities⁽⁶⁾ (with 343 companies), of which 228 on ESG issues (approximately 40% of the total engagements carried out in the period) ■ In Fideuram Asset Management SGR (FAM) and Fideuram Asset Management (Ireland) (FAMI), engagement activities were carried out respectively on 106 and 94 companies; among these, 78 (around 74%) for FAM and 82 (about 87%) for FAMI were engaged on ESG issues ■ During the year, the Private Banking Division held 16 events aimed at customers with around 14,000 participants, of which 4,000 were customers 	Enhancement of engagement activities in line with the Stewardship Principles
Sustainable insurance	Unit-linked policies	<ul style="list-style-type: none"> ■ 80.4%⁽⁷⁾ of unit-linked investment options associated with products open to new subscriptions (excluding pension plans) are classified according to Articles 8 and 9 SFDR (in 2022 it was 72%) 	Strengthening of the unit-linked/multi-line offering with ESG investment options
	Earthquake and/or Flooding insurance cover	<ul style="list-style-type: none"> ■ Earthquake and/or Flooding insurance cover provided to customers who insure their house: 38.5 billion euro of insurance value 	Strengthening of the positioning in the non-motor damage insurance segment, including the protection of real estate assets

⁽⁶⁾ For further information on the activities of the Group Companies in this area and in relation to the commitments made following their adherence to the Net-Zero initiatives, including the results achieved in 2023, see the 2023 Climate Report of the Intesa Sanpaolo Group [1].

⁽⁶⁾ Eurizon defined Engagement as the sharing of views/holding dialogues with the companies it invests in with a view to involvement and medium/long-term relationships, with the aim of monitoring and determining their commitments on specific issues, as well as taking part in the related shareholders' meetings.

⁽⁷⁾ Referred to the number of funds.

COMPANY POLICIES

Asset management and the insurance coverage of customers are central to the activities of the Intesa Sanpaolo Group, and are ensured through organisational structures in business areas specialising in asset management, private banking and protection requirements with financial and insurance products and services. Focusing on the customers' portfolio diversification requests on the basis of their needs (expenses, reserves, investments, pensions and protection) and specific goals in terms of the effective allocation of resources, increasingly related to assessments on sustainability, the product and service range offered has been expanded from financial management and consultancy to the area of protection which concerns all customers, from small to large asset holders, and from SMEs to large companies, with due adjustment of the guarantees. The activity is therefore aimed at the development of financial and insurance products and customer advisory services to meet the welfare and protection needs of households and businesses, including in the long term, facilitating informed choices also thanks to increasingly specialised advisory services from an ESG perspective. The internal regulations together with the Guidelines and Rules for the marketing of financial and insurance products also clearly explain the obligation of operators to act in a transparent, fair and diligent way in the provision of investment services, as required by applicable legislation as well.

In the Group Code of Ethics, within the framework of the principles of conduct towards customers, it is stated that ESG criteria are increasingly important in the valuation of investments and in the definition of insurance products, with the ultimate goal of promoting fair and sustainable development. For this reason, the Group aims, where possible, to offer its customers the opportunity to choose products that also meet their preferences in terms of sustainability, in order to activate a virtuous circle between companies' commitment towards sustainable behaviour and progressive customer awareness. With this in mind, the range in the portfolio includes funds that apply selection criteria in compliance with the Principles for Responsible Investment (PRI) with the aim of stimulating dynamics geared to long-term sustainability in the businesses invested in and to offer customers products that are sustainability-conscious. Eurizon Capital and Fideuram Asset Management SGR have also signed up to the Italian Stewardship Principles, defined from Assogestioni and that are inspired to the Stewardship Code promoted from the European Fund and Asset Management Association (EFAMA), in order to stimulate discussion and cooperation about social and environmental sustainability issues with listed issuers that the company invests in. As part of a more general process of integration of sustainability into business logic and strategies, the Intesa Sanpaolo Vita Insurance Group has subscribed to the Principles for Sustainable Insurance (PSI) promoted by the United Nations.

In line with the Group's policies geared to mitigating climate change, at the end of 2021, Eurizon Capital SGR, Fideuram Asset Management SGR and Fideuram Asset Management Ireland signed up to the Net Zero Asset Managers Initiative (NZAMI) and the Intesa Sanpaolo Vita Insurance Group signed up to the two Net Zero alliances regarding the insurance core business Net-Zero Insurance Alliance (NZIA) and Net-Zero Asset Owner Alliance (NZAOA); these initiatives promoted by the United Nations have the aim of achieving climate neutrality by 2050. After signing up, in 2022 the Intesa Sanpaolo companies active in assets and wealth management determined their respective targets for the Net Zero Asset Managers Initiative (NZAMI) and the Net-Zero Asset Owner Alliance (NZAOA). Eurizon and Fideuram are also part of the Institutional Investors Group on Climate Change (IIGCC), a European body for collaboration among investors on climate change, which acts to promote the reduction of carbon emissions.

This commitment continued in 2023 with Eurizon Capital SGR, Fideuram Asset Management SGR and Fideuram Asset Management Ireland also joining the Net-Zero Engagement Initiative (NZIE) and the Climate Action 100+ and Nature Action 100 initiatives, which focus on engagement activities with the aim of mitigating climate change and conserving natural capital and biodiversity. Eurizon also participates in Advance, a collective engagement initiative to promote respect for human rights, in particular with respect to companies operating in geographical regions most at risk.

In line with its active participation and public commitments within the scope of the most important European initiatives on ESG and climate, the Intesa Sanpaolo Group intends in the 2022-2025 Business Plan to become leader in Wealth Management, Protection & Advisory, with a strong commitment to ESG. In particular, it stated among its objectives an expansion of its sustainability-conscious range of products in asset management and life insurance, the further development of Eurizon's proprietary ESG scoring with the extension of its model to government issuers and the development by Fideuram of advisory services with an ESG focus. In the insurance sector, the Intesa Sanpaolo Group is committed to the development of a dedicated non-life ESG offer and the enrichment of the ESG/climate offer within the Life range of the Intesa Sanpaolo Vita Insurance Group.

In 2023, the Group Companies continued with the activities specified in the SFDR legislation (Regulation EU 2019/2088) in the area of sustainable finance, in terms of policies, roles, responsibilities, processes and reporting.

SUSTAINABILITY-CONSCIOUS INVESTMENTS

The European Union has consolidated its commitment to climate change mitigation and natural resource management with a series of regulatory provisions that have come into force in particular in the last three years. In view of the complexity of new legislation, it is essential to identify, monitor and manage risks and opportunities related to ESG factors with the ultimate aim of attracting capital and promoting sustainable growth in the European market.

In such a complex context, the Intesa Sanpaolo Group also confirmed its leadership in sustainability-conscious investments in 2023. The Group has reached a total of over 400 funds that promote environmental and/or social characteristics (among others) or that have sustainable investment objectives, classified pursuant to Articles 8 and 9 of the SFDR, amounting to assets of over 182 billion euro (310 funds with assets amounting to over 136 billion in 2022).

MEMBERSHIP OF THE NET ZERO ASSET MANAGERS INITIATIVE

After joining the Net-Zero initiatives at the end of 2021, in 2022 Eurizon Capital SGR, Fideuram Asset Management SGR and Fideuram Asset Management Ireland DAC determined their respective targets, approved by the individual Boards of Directors, following the publication - in the 2022-2025 Business Plan - of the 2030 targets for the reduction in financed emissions relating to the main emission-intensive sectors, resulting from their membership of the Net-Zero Banking Alliance. The year 2023 was an important year as regards membership of NZAMI, with the preparation of internal monitoring activities and external reporting of progress in the pursuit of the objectives (using the UNPRI platform) and with the start of engagement activities on the Net-Zero theme with respect to the investee issuers. The results achieved and all the activities performed by the Group Companies in the Net-Zero area were presented in the 2023 Climate Report of the Intesa Sanpaolo Group [1].

EURIZON

Eurizon Capital SGR SpA offers investors a wide and diverse range of funds that integrate sustainability risks into the investment process and at the end of 2023 boasted assets of about 149 billion euro in sustainability-conscious products⁽⁸⁾ that, in compliance with good governance practices, promote environmental and/or social characteristics, or that have sustainable investment objectives, classified pursuant to Articles 8 and 9 of EU Regulation 2019/2088 (SFDR). These products represent about 73.3% of the assets managed in UCITS (Undertaking for the Collective Investment in Transferable Securities) by the company⁽⁹⁾.

THE INTEGRATION OF ESG FACTORS INTO THE INVESTMENT PROCESS

The vision and mission of Eurizon Capital SGR S.p.A. underline the fiduciary commitment to its customers and investors and, more generally, to its stakeholders that requires the Company to effectively address sustainability issues, with particular reference to the returns of its financial products and to the issuers in which it invests on behalf of the assets under management. In line with its Commitment Policy, the asset management company also considers collaboration and dialogue with investee companies to be essential for promoting rules and behaviours geared to pursuing sustainable growth over time. In fact, Eurizon believes that issuers that implement high standards in terms of environmental, social and corporate governance issues are able to generate sustainable performance in the long term.

During 2023, Eurizon updated its Sustainability Policy by refining the ESG / SRI strategies adopted by the products and providing specific negative and positive screening criteria and engagement strategies; the Eurizon Sustainability Policy provides, in particular, for:

⁽⁸⁾ UCITS pursuant to Articles 8 and 9 of Regulation (EU) 2019/2088 (SFDR).

⁽⁹⁾ About 74% including Portfolio Management (GP) pursuant to Articles 8 and 9 of the SFDR.

- Negative screening
 - “SRI exclusions and restrictions” applied to issuers operating in sectors that are not considered “responsible”, that is, characterised by an evident direct involvement in the manufacture of unconventional weapons, deriving at least 25% of turnover from mining or electricity production related to thermal coal or at least 10% of turnover from oil & gas extraction through the exploitation of oil sands; the restrictions are applied to Limited Tracking Error products that do not include ESG factors in their investment process.
 - “ESG exclusions and restrictions” applied to issuers deemed “critical”, that is, characterised by a higher exposure to environmental, social and corporate governance risks, since they have a lower ESG rating provided by the provider MSCI ESG Research within the universe of equity and bond investment. The restrictions apply to Limited Tracking Error products that do not include ESG factors in their investment process.
- Positive screening
 - In compliance with good governance practices, “ESG Integration” in the analysis, selection and composition of assets under management, pursuant to Article 8 of the SFDR Regulation (in particular “ESG Score Integration”, “Thematic Integration”, “Sustainable Integration”, “Manager Selection Integration”, “Index Integration”, “Sovereign Integration” and “Carbon Footprint”⁽¹⁰⁾);
 - In compliance with good governance practices, pursuit of “Sustainable Investment Objectives”, pursuant to Article 9 of the SFDR Regulation, through investment screening methods aimed at (i) contributing to Sustainable Development Goals promoted by the United Nations (so-called “SDG Investing”); (ii) generating a social or environmental impact together with a measurable financial return (so-called “Impact Investing”).
- “Engagement” (so-called Stewardship or Active Ownership - Engagement)
 - Fostering proactive interaction with the investee issuers both through the exercise of intervention and voting rights, and through discussions i.e. “engagement” in order to establish effective communication with the management of the companies gearing to the pursuit of sustainable growth.

In particular, the main innovations implemented during 2023 in the context of the Sustainability Policy concerned:

- Enhancement of the methods for verifying the adoption of good governance practices by investee companies, in particular with regard to sound management structures, staff relations, staff remuneration and compliance with tax obligations, in accordance with the provisions in the SFDR Regulation⁽¹¹⁾;
- The extension of the proprietary score known as the Eurizon ESG Score to include government issuers as well. In particular, this score weighs up the degree of sustainability of each country with respect to the E, S and G pillars and assesses the evolution of risk management policies and ESG opportunities over time by government issuers.

In addition, Eurizon Capital SGR has defined specific methods for the selection and monitoring of financial instruments aimed at integrating sustainability risks and ESG factors also within the Investment Process for financial instruments in the so-called Private Markets managed by Eurizon Capital Real Asset SGR S.p.A.

For each ESG/SRI strategy, Eurizon maintains specific decision-making processes and operational limits aimed at containing the risks (including reputational risks) of the managed portfolios, whose compliance is monitored by the Risk Management Function with the support of the Compliance & AML Function.

It should also be noted that, in 2023, in line with the provisions of the SFDR Regulation, a quantitative disclosure was made on the principal adverse impacts of investment choices on sustainability factors (so-called PAI) with reference to Eurizon Capital SGR SpA and its subsidiaries.

In 2023, Eurizon followed its practice from previous years and voluntarily published its Sustainability Report for the year 2022 referred to the Asset Management Division. In line with what was done for the previous year and in compliance with the reporting standards adopted for the definition and prioritization of material issues, the Company involved various external and internal stakeholders, including numerous corporate bodies and structures, which contribute to the definition and implementation of the Sustainability Policy as evidence of the transverse nature of corporate commitments.

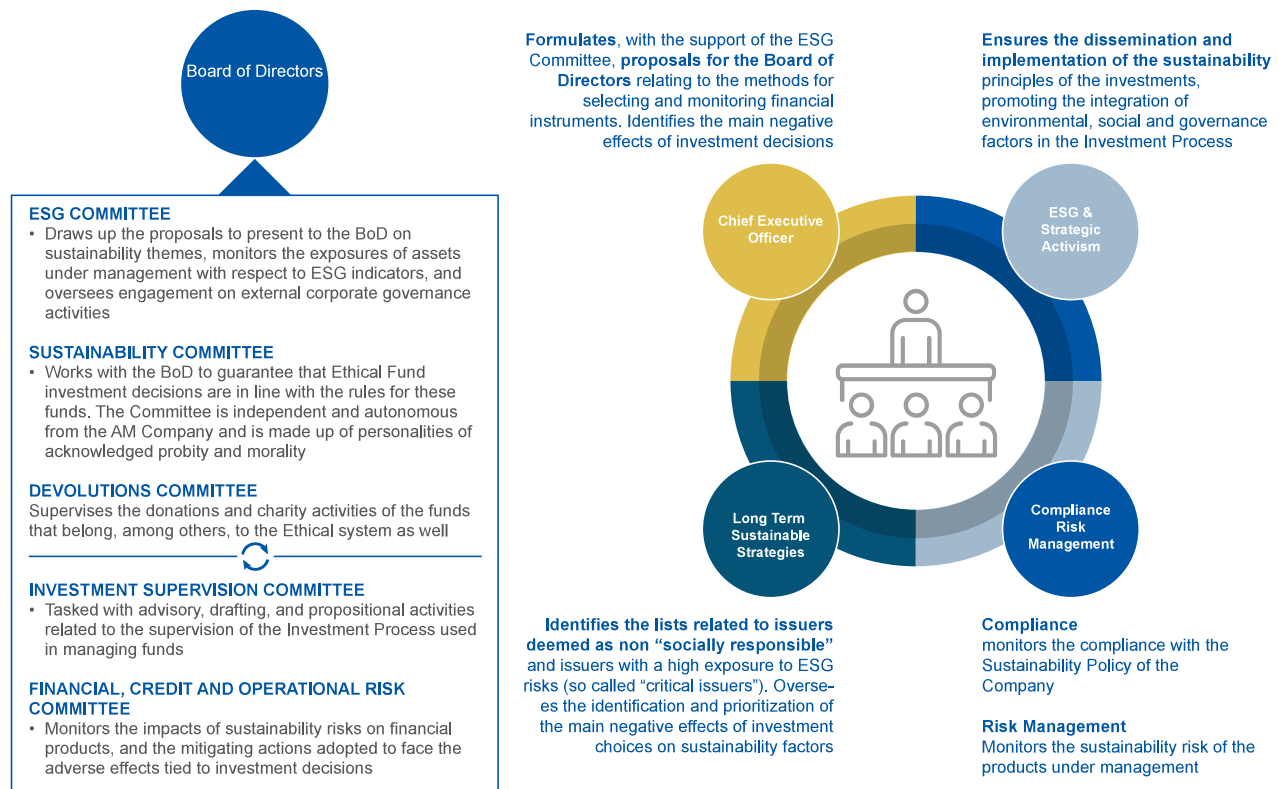
⁽¹⁰⁾ For further information on the ESG/SRI strategies adopted by Eurizon Capital SGR, see the Sustainability Policy [\[i\]](#).

⁽¹¹⁾ The asset management company has defined an internal screening model that evaluates corporate issuers for the purpose of investing in Article 8 and Article 9 products based on 6 indicators, giving a positive assessment to those companies that (i) have solid management structures i.e. have independent directors in the administrative body, have not received negative opinions from the external auditor and have no disputes in relation to Principle 10 of the United Nations Global Compact (“UNGC”) regarding their commitment against corruption in all its forms; (ii) as regards relations with staff, they have no disputes in relation to Principle 3 UNGC on freedom of association and the recognition of the right to collective bargaining; (iii) as regards staff remuneration, they have no disputes in relation to Principle 6 UNGC on the elimination of discrimination in employment and occupation; (iv) they have no disputes regarding tax compliance i.e. proceedings on matters of taxation involving the company that have not yet been resolved.

During the year, Eurizon also updated its Commitment Policy, which sets out the methods of dialogue with investee companies and the issues considered a priority by the asset management company as part of the Stewardship activities conducted by the Company. In particular, four macro-themes were identified for 2023: (i) mitigation and adaptation to climate change, (ii) mitigation of biodiversity loss and combating deforestation, (iii) respect for human rights and combating the production of unconventional weapons and (iv) the adoption of good governance practices.

Lastly, for the year 2023 the Donations Committee of Eurizon - the body that oversees the donations and charitable activities of the Asset Management Division - approved the donation of an amount of 733,000⁽¹²⁾ euro in favour of 56 charitable initiatives, as part of the donations envisaged by the legal documentation of certain managed products. In particular, priority was given to initiatives in support of social and humanitarian activities, medical research and support for the needy.

EURIZON'S GOVERNANCE OF SUSTAINABILITY



Eurizon has adopted an operating model that provides for the involvement of corporate bodies and structures that are assigned specific roles and responsibilities for the monitoring and management of sustainability risks. In particular, within the Investment Department, the ESG & Strategic Activism structure takes care of the dissemination and implementation of the principles of investment sustainability, oversees the Stewardship activity and has specific responsibilities in the field of:

- Corporate Governance, i.e. regarding (i) the monitoring and management of shareholders' meetings in relation to the exercise of voting rights for investments held by the Company's assets under management, (ii) as well as engagement activities with issuers related to environmental, social and corporate governance issues, collaborating and discussing, where necessary, with the Sustainability unit and with the colleagues in the Investment Department;
- Sustainability, i.e. regarding Sustainability issues and SRI Investments, for which it provides support to Senior Management in relation to the integration of environmental, social and governance factors in the Company's Investment Process.

⁽¹²⁾ In addition to this amount, 11,000 euro was donated during the year in favour of another 2 initiatives considered worthy by the Committee

ACTIVE OWNERSHIP ENGAGEMENT

As an adherent to the Stewardship Principles for the exercise of administrative and voting rights in listed companies, the asset management company pays particular attention to the policies implemented by issuers, encouraging exchanges of views with the companies it invests in. The Stewardship Principles are defined by Assogestioni and draw inspiration from the Stewardship Code promoted by the European Fund and Asset Management Association (EFAMA), of which Eurizon Capital SGR is a member, and which aim to encourage, at a European level, the development of good corporate governance practices.

In 2023, Eurizon conducted a total of 1,165 meetings with issuing companies; of these, 592 were considered engagement activities⁽¹³⁾ and involved 343 issuers. The engagements that covered ESG issues in the period numbered 228 and represented about 40% of the total engagements held in the period, confirming Eurizon's strong commitment to sustainability issues and active ownership engagement.

In this context, it should be noted that as part of the Net Zero Asset Managers Initiative (NZAMI)⁽¹⁴⁾, in July 2022, the engagement activities began with the aim of contacting 155 companies by 2030, selected by taking into consideration various factors, including the current level of carbon emissions, the estimated level for the future, the jurisdiction and the progress made to date with reference to the set objectives of decarbonisation.

In addition, in view of the asset management company's constant commitment to promoting the adoption of high corporate governance standards and a conduct geared towards the sustainable growth of the companies in which it invests, in 2023 Eurizon updated the Voting Procedure relating to the financial instruments pertaining to the assets under management of Eurizon Capital SGR S.p.A., defined in implementation of the Strategy for the exercise of intervention and voting rights regarding the financial instruments pertaining to the assets under management of Eurizon Capital SGR S.p.A., which was also updated.

In this regard, Eurizon adopts differentiated processes for the exercise of voting rights, depending on whether the decision is attributable to the meetings of the companies deemed most relevant on the basis of quantitative and qualitative criteria⁽¹⁵⁾ or of the companies for which the asset management company uses electronic voting (proxy voting).

Following these changes, in 2023, Eurizon took part in 1,413 shareholders' meetings of 100 selected companies listed on Borsa Italiana (7% of the total) and 1,313 companies listed on the international markets (93%), voting on 18,641 resolutions on the agenda.

In 2023, Eurizon published its Stewardship Report on engagement activities and the exercise of voting rights, reporting not only statistics on the activities carried out, but also in detail about the most significant issues that the asset management company had to address.

NEW SUSTAINABILITY-CONSCIOUS PRODUCTS

Under Regulation (EU) 2019/2088 (SFDR), at the end of 2023, the assets of the UCITS (Undertakings for Collective Investment in Transferable Securities) offered pursuant to Articles 8 and 9 amounted to approximately 149 billion euro, representing a total of about 73.3% of the assets managed in UCITS by Eurizon⁽¹⁶⁾; in particular, the assets of the products pursuant to Article 8 amounted to approximately 145.6 billion euro and the assets of the products pursuant to Article 9 to approximately 3.4 billion euro.

The number of products managed⁽¹⁷⁾ according to these criteria was 306 (60 of which were launched in 2023) - considering the individual placement windows - referring to all the main asset classes (equity, balanced, flexible, bond, money-market and alternative). In particular, in line with the company mission, in 2023, the asset management company launched several UCITS that integrate ESG factors in the selection process and envisage capital protection, "step-in" strategies for gradual investment in the equity markets or "buy&watch" methods for managing bond portfolios with decreasing duration.

It should be noted that in response to the continuous commitment to the Net-Zero targets signed and published by the asset management company in 2022, the Company launched the third edition of the "Eurizon Step 50 Net-Zero Objective" fund which, like the previous two launched in 2022, invests in global companies committed to achieving the Net-Zero objective by 2050.

Within the scope of the International Subsidiary Banks Division, the range of sustainability-conscious products

⁽¹³⁾ Eurizon defined Engagement as the sharing of views/holding dialogues with the companies it invests in with a view to involvement and medium/long-term relationships, with the aim of monitoring and determining their commitments on specific issues, as well as taking part in the related shareholders' meetings.

⁽¹⁴⁾ For further information on the activities of the Group Companies in the area of Engagement and Stewardship and in relation to the commitments made following their adherence to the Net-Zero initiatives, including the results achieved in 2023, see the 2023 Climate Report of the Intesa Sanpaolo Group [\[1\]](#).

⁽¹⁵⁾ For further information on the qualitative and quantitative criteria defined by Eurizon, see the Commitment Policy of Eurizon Capital SGR S.p.A. [\[1\]](#).

⁽¹⁶⁾ About 74% including Portfolio Management (GP) pursuant to Articles 8 and 9 of the SFDR.

⁽¹⁷⁾ UCITS.

offered by VÚB Banka (Slovakia), Intesa Sanpaolo Bank (Slovenia), Privredna Banka Zagreb (Croatia) and CIB Bank (Hungary) was further extended reaching a total of 51 funds in the catalogue. More specifically, the Division offers the Manager Selection range that benefits from the recent revision from Article 6 to Article 8 according to the SFDR regulations and VÚB Banka proposed a new global equity fund during the year pursuant to Article 8.

GREEN BONDS IMPACT REPORT

In May 2023, the asset management company published the Green Bonds Impact Report regarding Eurizon Fund Absolute Green Bonds and Eurizon Fund Green Euro Credit, which details the results of the quantitative impact analysis and the contribution to the UN's SDGs for 2022⁽¹⁸⁾.

More specifically, as regards the Eurizon Fund Absolute Green Bonds, it was calculated that for every million euro invested, the following results are achieved: 837 megawatt/hours of renewable energy produced, 1,478,928 litres of water saved or purified and a reduction of 749 tonnes of CO₂. At the end of December 2023, the fund's assets amounted to over 1.34 billion euro and during 2022 it invested in 457 Green and thematic bonds.

With reference to the Eurizon Fund Green Euro Credit, for every million euro invested, the following results are achieved: 1,056 megawatt/hours of renewable energy produced, 1,600,737 litres of water saved or purified and a reduction of 717 tonnes of CO₂. At the end of 2023, the fund's assets amounted to over 0.73 billion euro.

Also with reference to institutional mandates, the Company's investment process takes into account the integration of ESG criteria in its investment choices in accordance with the provisions of Regulation (EU) 2019/2088. In particular, all mandates comply with exclusion criteria both with regard to SRI issues (with reference to issuers operating in "non-responsible" sectors) and ESG issues ("critical" issuers with low ESG scores). A specific ESG report is regularly produced on a large number of mandates (45 mandates with a value of 11.2 billion euro managed), indicating the positioning of the portfolio with respect to the reference benchmark. In addition, Eurizon manages a total of 31 mandates relating to 17 customers for approximately 7.5 billion euro (of which 8 are attributable to the scope of the subsidiary Eurizon Capital Real Assets SGR S.p.A.) on which specific investment restrictions are implemented and/or support is provided to customers within the engagement and corporate governance activities.

FIDEURAM - INTESA SANPAOLO PRIVATE BANKING

The Private Banking Division considers the integration of environmental, social and governance factors into its business model of fundamental importance, in the belief that these elements, as well as promoting economically and socially sustainable development, can contribute positively to the financial results of customer portfolios, while at the same time reducing the risks.

In line with the regulatory developments introduced at a European and national level regarding sustainability, the internal regulations are constantly updated to incorporate changes in customers' preferences, product governance and management of financial products, investment service delivery processes, advice on financial products and distribution of insurance products.

SUSTAINABILITY POLICIES

With the aim of outlining an approach geared not only towards sustainability-conscious and responsible investments (SRI) but also towards integrating environmental, social and corporate governance factors, the Division's product Companies have adopted Sustainable and Responsible Investment Policies. These policies involve all employees and freelancers and apply to company activities and investment processes. It should be noted that, during 2023, some updates to the Sustainable and Responsible Investment Policies were made by Fideuram Asset Management SGR and Fideuram Asset Management (Ireland) DAC, both through the inclusion of further exclusion criteria in the selection of financial instruments (issuers involved in unconventional oil & gas extraction activities and in armaments as provided for in the "Rules governing transactions with subjects active in the armaments sector" of the Intesa Sanpaolo Group) and through the strengthening of the concept of good governance of investee companies in accordance with the SFDR Regulation, verifying the existence of a minimum set of requirements with reference to the management structure, relations with staff and its

⁽¹⁸⁾ For further information on the important environmental and social impact results deriving from the investments made, one should refer to the Green Bonds Impact Report [\[1\]](#).

remuneration and compliance with tax obligations.

Finally, some additions were made to the Article 8 framework and to the classification of an issuer as a “sustainability-conscious investment”.

Pursuant to Articles 3 and 4 of the SFDR Regulation, Fideuram also publishes on its institutional website the Policy document on the integration of sustainability risks and information on the principal adverse impacts on sustainability factors in providing its investment advisory services and in the field of insurance distribution, through which it illustrates its policy with respect to the integration of ESG sustainability risks in company activities and processes for selecting issuers and defining the catalogue of financial products and delivering advisory services.

Commitment Policies have also been adopted to describe the forms of behaviour that Division companies should adopt to stimulate the sharing of views with issuers and to encourage long-term commitment in the companies they invest in. In addition, both Companies (Fideuram Asset Management SGR and Fideuram Asset Management Ireland DAC) perform activities related to the exercise of administrative and voting rights, through the ISS proxy voting platform for securities held by the managed Funds. In accordance with the SRD II Directive, Fideuram Asset Management SGR has also adhered to the Italian Principles of Stewardship promoted by Assogestioni for the exercise of administrative and voting rights in listed companies, thus ensuring full transparency regarding the issuer’s performance and strategy, governance, corporate social responsibility and risk management.

SUSTAINABILITY GOVERNANCE

Fideuram - Intesa Sanpaolo Private Banking, through a Governance system based on important organisational safeguards, builds and pursues an integrated company strategy that focuses on business results but also on human, social, relational and environmental capital. In particular:

- the Sustainability Manager has a role of integrated and comprehensive oversight of the ESG initiatives, also in liaison with the Intesa Sanpaolo Group initiatives;
- the “Sustainability (ESG)” session, within the Division’s Steering Committee, identifies sustainability issues at least once every quarter and defines strategic initiatives, assessing their financial feasibility and impact;
- Fideuram Asset Management’s ESG & Strategic Activism team ensures proper management of ESG issues also in the Division’s asset management companies. Its main tasks include: integrating ESG metrics into the financial analysis of the products managed, assessing the sustainability profiles of products distributed and managed by third parties, managing products focused on sustainability and overseeing corporate governance and engagement activities with respect to issuers; the structure also deals with the implementation of the Net-Zero Asset Management Initiative project and initiatives in favour of combating climate change; in particular, in 2023 Fideuram Asset Management SGR and Fideuram Asset Management Ireland signed up to the Climate Action 100+ and Nature Action 100 initiatives⁽¹⁹⁾.

In 2023, the ESG Program launched in 2021 by the Division was continued, aiming at integrating sustainability into all aspects of business management and operations with the across-the-board involvement of all company functions. The main objectives worth highlighting include the definition of strategic positioning with respect to ESG issues, the integration of sustainability into the service model, the inclusion of sustainability factors and risks both in the investment process and in financial advisory activities and the development of corporate culture and sensitivity towards ESG issues.

PRODUCTS THAT INTEGRATE ESG FACTORS

The development and selection of new investment solutions specify that the process of selecting issuers and Product Companies should include analyses aimed at assessing their positioning with respect to parameters referring to ESG factors and sustainability risk management; furthermore, in compliance with Regulation (EU) 2019/2088 (SFDR), the criteria for classifying sustainable products (Articles 8 and 9) were adopted at a Group level, as applicable, and also the presence of sustainability-conscious/eco-sustainable investments (Article 2 paragraph 17 of Regulation (EU) 2020/852) and the consideration of PAIs (Article 7 of the SFDR). This approach strengthens the assessment of product sustainability during the selection phase and when monitoring the offered range of products over time.

In response to a customer-base with a strong appetite for sustainability, as emerges from the analysis of the responses to the MiFID questionnaires, and in line with the Group’s objectives, the Division continues its dialogue with its product factories and with its third-party partners with a view to expanding the offer of sustainability-conscious investment solutions available to the advisors in the Networks.

⁽¹⁹⁾ For further information on their membership, see the 2023 Climate Report of the Intesa Sanpaolo Group on the Group’s institutional website [\[1\]](#).

As part of the Company's products and services, already in the range, it is worth noting the activity carried out by Fideuram Asset Management SGR, which has brought 16 asset management lines back into line with Article 8 SFDR (11 Fogli Fideuram, 1 Fideuram Omnia and 4 Wealth Collections).

Also in 2023, the new offer was strongly directed to solutions that reflected the criteria adopted by the Division in terms of ESG with an incidence of over 80% of the products pursuant to Articles 8 and 9 SFDR on the total of new products. The new aspects concerning the various product families (traditional and alternative funds, portfolio management, insurance investment products and placements of asset management products), included the following:

- Willerfunds Private Suite, 5 new sub-funds of the vehicle of Fideuram Asset Management Ireland dedicated to the Intesa Sanpaolo Private Banking (ISPB) Network, created with leading international asset managers, of which 4 that promote environmental and/or social characteristics (Article 8 SFDR) and 1 with sustainable investment objectives (Article 9 SFDR);
- FAI Progetto Italia II, created by Fideuram Asset Management SGR in collaboration with Eurizon Capital Real Asset SGR S.p.A. (ECRA), which allows investment in selected Italian companies and benefiting from the tax incentives provided for by the legislation on Alternative Individual Savings Plans, with a strategy that integrates sustainability criteria and risks in the investment policy and is classified pursuant to Article 8 SFDR.

Within the scope of Portfolio Management, the Fogli Fideuram range has been extended with new ESG lines, including the Foglio Net-Zero Transition (Article 8 SFDR), and the investment universe of Il Mio Foglio ESG (Article 8 SFDR) has also been enriched; the latter allows the customer to construct their own portfolio starting from a specific list of strategies that have strong ESG characteristics (all classified under Articles 8 or 9 SFDR) or to use predefined model portfolios ("guided pathways") broken down by level of risk and built according to a "High Conviction" approach, linked to the tactical selection of specific ESG topics.

As at 31 December 2023, Fideuram Asset Management SGR and Fideuram Asset Management (Ireland) had a range of 240 products pursuant to Articles 8 and 9 of the SFDR, for a total of assets under management of 60.5 billion euro, divided as follows: 33.3 billion in investment funds, 21.2 billion in portfolio management and the remaining portion in insurance products. More specifically, the ESG offer in funds included 92 funds classified pursuant to Article 8 and 5 classified pursuant to Article 9 of the SFDR Regulation out of a total of 191 funds (33.3 billion euro equal to 71% of the total assets of the Funds).

As an addition to the Group's product offering according to the Guided Open Architecture Approach to meet even the most sophisticated needs, customers can also find third-party ESG products on offer in the catalogue in collaboration with leading international investment houses. As at 31 December 2023, it should be noted that approximately 70% of customers' assets under management are invested in products classified pursuant to Articles 8 and 9 of the SFDR (57% in 2022).

ESG ADVISORY AND ENGAGEMENT

In line with the objective stated in the 2022-2025 Business Plan relating to the Development of dedicated ESG advisory services, also during 2023 Fideuram supplemented its service model based on customised advice to manage the sustainability preferences of its customers, which from July 2021 are collected by using the MiFID profiling questionnaire. During the year, a question was included in the MIFID questionnaire regarding the minimum percentage of sustainable products that the customer wishes to hold in their portfolio, consequently modifying the ESG consistency check at the time of the proposal. In addition, during the year, there was enhanced provision of regulatory information for financial products and investment services (for example, percentages of alignment to taxonomy and of sustainability-conscious investments and Principal Adverse Impacts - PAI) and these were made available on the platforms and in the reports of Fideuram and Intesa Sanpaolo Private Banking.

As regards engagement, in 2023 Fideuram Asset Management SGR and Fideuram Asset Management (Ireland) DAC carried out 112 and 98 activities respectively, of which 78 and 82 on ESG issues (69.6% and 83.7%).

With a view to awareness raising⁽²⁰⁾ and engagement with customers on sustainability issues, 16 events were held in 2023 with around 14,000 participants, of which 4,000 were customers.

⁽²⁰⁾ One should refer to the 2023 Climate Report of the Intesa Sanpaolo Group [\[i\]](#) for further information on the Group Companies' activities in the field of engagement and stewardship and in relation to the commitments made following their signing up to the Net-Zero initiatives, including the results achieved in 2023.

ESG AMBASSADOR

Customers' interest in sustainability-conscious investments is constantly growing: in this evolutionary process, Private Bankers play a fundamental role, being ready to listen and to address customers' needs by making them understand the logic of an ESG investment and its points of value.

The Private Banking Division trains highly qualified professionals, who consciously reflect ESG values, spreading a financial culture attentive to sustainability criteria and offering a quality service. For this reason, several training courses have been run on the subject, in partnership with prestigious Italian universities, and some ad hoc training sessions, taking advantage of the experience of important international Asset Manager companies.

The establishment of the role of ESG Ambassador becomes a part of this context. This role is currently covered by a group of 34 Private Bankers, selected for a first pilot phase from the approximately 6,000 Private Bankers of the Fideuram and Intesa Sanpaolo Private Banking Networks on the basis of their attention to ESG issues.

The remit of the ESG Ambassadors is to promote, in their respective areas, the culture of sustainability with a dual purpose: to disseminate ESG issues and sustainable behaviours and to act as a listener to the needs of customers and Private Bankers.

With the introduction of the figure of the ESG Ambassador, the Division aims to further accelerate the process of disseminating sustainable guidelines and policies not only within the Division, but also with respect to customers and the country in general.

SUSTAINABLE INSURANCE

Intesa Sanpaolo Vita S.p.A., as Parent Company of the Intesa Sanpaolo Vita Insurance Group (hereinafter the Insurance Group), continued its development of environmental and social sustainability issues in 2023, performing actions in various business areas (products, investments, claims management) and specific initiatives aimed at generating a concrete impact on society.

The Intesa Sanpaolo Vita Insurance Group integrates ESG factors in the various business areas in which it operates in line with the requirements of the legislation and with the commitments assumed with its membership of the Net-Zero Asset Owner Alliance, the Net-Zero Insurance Alliance, the UN's PSIs (Principles for Sustainable Insurance) and with the principles defined by other international initiatives, including the United Nations Global Compact and the Equator Principles, to which the parent company Intesa Sanpaolo has signed up to and which are part of the aims to achieve the UN's Sustainable Development Goals.

SUSTAINABILITY GOVERNANCE

Intesa Sanpaolo Vita S.p.A. has prepared tools for the monitoring of Governance and risk management in the field of sustainability through the attribution of roles and responsibilities, the definition of policies, processes and dedicated project initiatives, also in line with the evolution of national and international legislation.

In 2023, the organisational unit continued its activities dedicated to sustainability, in line with its aim to coordinate the ESG projects of the Companies in the Insurance Group, promote internal and external initiatives to spread the culture of sustainability and facilitate its implementation together with the relevant functions. In addition, it has the task of coordinating the transverse positioning initiatives of the Insurance Group in the ESG field, promoting those related to the insurance culture and acting as a point of contact with the bank's Parent Company and external stakeholders.

During the year, the Insurance Group continued along the roadmap of ESG objectives that are strategic and compliant with regulations, and the short- and medium-term action plans as defined in the 2022-25 Business Plan. The working groups maintain engagement with the main structures of the Division and constant coordination with the bank's Parent company and the other divisions of Intesa Sanpaolo (in particular the Private Banking and Asset Management Divisions).

In 2023, the Insurance Group updated its Sustainability Policy which summarises the Group's values and commitments, attributable to the objective of promoting a responsible and sustainable business model by increasingly integrating sustainability principles into company decisions and processes. The Policy also assigns roles and responsibilities to the Board of Directors and company structures with respect to the integration of ESG principles, as well as describing the sustainability pillars by arranging them into concrete commitments in the environmental, social and governance fields.

The Policy of the Insurance Group for the integration of ESG sustainability factors in the investment process was also updated, strengthening the effectiveness of ex-ante monitoring of the investment strategy and providing for a further extension of the exclusion lists towards critical issuers and those operating in sectors considered not to be socially responsible. In line with the changes to the Policy, the management mandates were also updated to include the new ESG rules and safeguards. The Due Diligence process on third-party investment houses and the process of engagement of the counterparties in the portfolio were also reinforced.

In terms of disclosure, at the beginning of 2023 Intesa Sanpaolo Vita published the Report on progress for the year 2022 on its Principles for Sustainable Insurance (PSI) [\[i\]](#) website. The document, based on the strategic approach identified by the Insurance Group to address ESG risks and opportunities, illustrates the actions taken along the insurance value chain to provide an increasingly positive response to the PSI principles both on the business and risk management model, and in the engagement of internal and external stakeholders in order to disseminate these principles and promote initiatives for society and the environment.

In June 2023, in compliance with regulatory requirements, the first Statement on the principal adverse impacts of investment decisions with respect to sustainability factors (PAI Statement) was published on the websites of the Life Insurance companies, taking into account all mandatory indicators and two additional indicators contained in Annex I of Delegated Regulation (EU) 2022/1288. In addition, the Policy on Principal Adverse Impacts on Sustainability (PAI) was updated in December 2023, which defines the procedures for considering the principal adverse impacts of investment decisions on the identified sustainability factors, the identification of priority PAIs and a review of the monitoring system. This policy is applicable to all life companies in the Insurance Group. In addition, the Risk Management Framework was updated, with a view to integrating ESG factors into the Insurance Group Risk Map and the Risk Appetite Framework (RAF) and the review of the risk policy framework was also completed.

In this context, the Own Risk and Solvency Assessment (ORSA) Report was also enriched to include prospective analyses of the risks deriving from climate change, both in the field of non-life and life insurance, also through the running of stress tests.

During 2023, the first Opinion on the sustainability risks of the Actuarial Function was also prepared, in compliance with Delegated Regulation (EU) 2015/35, which requires the Actuarial Function to make comments about sustainability risks with respect to the underwriting policy.

Remuneration and Incentive Policies have also been updated, consistent and in line with the provisions on the integration of sustainability risks pursuant to Regulation (EU) 2019/2088. Also for 2023, following the procedure from the previous year, managers were assigned one KPI, among the strategic action objectives, with a 15% weight called "Environmental, Social and Governance (ESG)". The objectives related to the ESG KPI are based on results at Parent Company level, recognizing the Group's commitment to sustainability as a whole, and at Insurance Group level, in order to enhance the areas of action of the individual structures.

Furthermore, in keeping with 2018, a KPI for the Key Functions was confirmed for 2023 with a weight of 10% with the name "Risk Culture – Promoting awareness at all levels of the organisation regarding emerging risks, with a particular focus on the risks related to climate change and technological innovation, by means of educational, awareness raising and training initiatives".

Summaries of the Remuneration Policies mentioned above have been published on the Companies' websites.

Finally, also to meet the requirements of IVASS Regulation no. 38/2018, a training plan was prepared for the Boards of Directors of the Companies in the Insurance Group - in order to guarantee an adequate set of technical skills to perform their role in compliance with the nature, scope and complexity of the tasks assigned - which also envisaged a specific meeting on ESG issues and the impacts they generate in the insurance context. The meeting was entitled "ESG OnLive Event: Sustainable Lending and Investments" and focused on the fundamental role of investments within the "ESG revolution".

In line with the developments in the international regulatory environment, in 2023 activities continued in order

to comply with regulatory requirements with reference to Regulation EU 2019/2088 (SFDR) and Delegated Regulation EU 2022/1288 (SFDR) relating to disclosures on sustainability in the financial services sector, and Regulation EU 2020/852 (Green Taxonomy) which defines a regulatory framework that favours sustainability-conscious investments.

In particular, during the year, the periodic reports were improved and the pre-contractual product information sheets for Insurance Based Investment Products (IBIPs) and pension products were updated, also in light of the requirements of the COVIP Circular⁽²¹⁾.

At a project level, the activities planned for the creation of a first data infrastructure and processes to manage new ESG needs were completed during the year, and a specific Dashboard was created to monitor ESG objectives.

In response to the entry into force of new regulations⁽²²⁾, impact analyses were carried out and, where necessary, some new projects were started. Following the introduction of Directive (EU) 2022/2464 Corporate Sustainability Reporting Directive (CSRD), during the second half of 2023 the Insurance Group launched a series of preparatory activities for the preparation of sustainability reporting by undertaking a first double-relevant analysis exercise to identify the impacts, risks and opportunities applicable to the Insurance Group.

MEMBERSHIP OF THE NET-ZERO INSURANCE ALLIANCE (NZIA) AND NET-ZERO ASSET OWNER ALLIANCE (NZAOA)

The Intesa Sanpaolo Vita Insurance Group signed up to the Net Zero alliances in December 2021.

In particular, as required by the Net-Zero Asset Owner Alliance (NZAOA), it undertook to reduce greenhouse gas emissions to zero within the investment portfolio of the Group's companies by 2050 through the definition of specific intermediate objectives on the investment portfolio (for example, carbon intensity), engagement activities with the main counterparties to develop and promote pathways to transition and incentives for the financing of climate transition and new green technologies. In October 2022, the Insurance Group published its first interim climate targets for the investment portfolio. All the results achieved and the activities fulfilled in 2023 by the Insurance Group in the Net-Zero field are discussed in the 2023 Climate Report of the Intesa Sanpaolo Group [i].

SUSTAINABILITY-CONSCIOUS INVESTMENTS

The development of the governance system and the offer was accompanied by a continuous evolution of the strategies for integrating ESG factors into investment choices and strengthening the systems for monitoring and controlling them.

The Policy of the Insurance Group for the integration of ESG sustainability factors in the investment process describes the methods for selecting and monitoring financial instruments adopted by the Insurance Group in order to integrate the analysis of sustainability risks into its investment process.

In particular, in order to integrate ESG factors into its investment choices, the Insurance Group adopts the following criteria:

- exclusion of issuers operating in sectors deemed not to be "socially responsible" to which restrictions or exclusions apply with respect to the Investment Universe of the individual assets under management
- exclusions and restrictions with respect to issuers defined as "critical" i.e. those companies with a higher exposure to environmental, social and corporate governance risks, that is companies with a lower ESG sustainability rating
- exclusions, for products classified under Articles 8 and 9 pursuant to SFDR, with respect to issuers that do not comply with sound governance practices assessed with reference to the presence of solid management structures, relations with personnel and their remuneration, and compliance with tax obligations.

The Insurance Group also promotes proactive engagement with issuers by exercising participatory and voting rights, including through Delegated Managers and by engagement with investees, encouraging effective communication with the Management of the companies i.e. "active ownership – engagement".

As part of the selection and monitoring process of UCITS (so-called Manager Selection Integration) - both

⁽²¹⁾ Supervisory Commission on Pension Funds (COVIP)

⁽²²⁾ Remember: the entry into force of Delegated Regulation (EU) 2023/2485 which defines the additional economic activities that contribute substantially to the mitigation and adaptation of climate change, making amendments to some pre-existing activities; the publication of Delegated Regulation EU 2023/2486 (Environmental Delegated Act), which outlines the technical screening criteria for the remaining four environmental objectives set out in the Taxonomy. The latter modifies some rules for calculating the KPIs in the Taxonomy and updates the reporting templates.

promoted and distributed by the Group companies and by third-party fund houses - the Insurance Group, when directly supervising the selection process of the UCITS, includes the financial analysis of the UCITS by analysing the level of integration of SRI and/or ESG factors and the related sustainability risks, through a Due Diligence process.

The Investment Committee, in the quarterly Group Session, oversees and analyses the situation of the portfolio, checks on the application of limits and rules under the Policy of the Insurance Group for the integration of ESG sustainability factors in the investment process, the performance of engagement activities and the results of the checks and monitoring conducted by the Risk Management Function.

The Investment Committee also plays an informative and advisory role in defining the proposals to be submitted to the Board of Directors of Intesa Sanpaolo Vita as part of its remit for the Group regarding sustainable and responsible investment issues aimed at ensuring the innovation of adopted methods and processes, the monitoring of compliance with ESG indicators and of the procedures used to take account of these indicators for the different products and services offered to customers.

Thanks to cross-cutting working groups that also involved the Group's asset management companies, a constant focus was maintained on the evolution of the external context, available data and methods and the possible areas for further development.

The assets under management relating to investment options pursuant to Articles 8 and 9 of the SFDR, regarding IBIPs and Pension Fund products, amounted to 60.6 billion euro as at 31 December 2023 (equal to 34% of the total assets under management), showing an increase compared to 41.7 billion euro at the end of 2022.

INSURANCE PRODUCTS AND SUSTAINABILITY

In 2023, the Life and Non-Life offer was the subject of various changes aimed at developing it in a more ESG style.

As part of the Life Business, in which the Insurance Group operates with the companies Intesa Sanpaolo Vita, Fideuram Vita and, until the end of November 2023, Intesa Sanpaolo Life⁽²³⁾, there was continued commitment towards offering customers an increasingly wide range of investment options under Articles 8 and 9 of Regulation (EU) 2019/2088 (SFDR).

Life Business products include sustainability aspects in the following areas:

- “Savings and Investment” (insurance investment solutions)
- “Supplementary Pensions” (products that use savings to build a supplementary pension in addition to the state pension)

In the “Savings and Investment” category, the enrichment in terms of sustainability covered all types of products (Unit-Linked, multi-class, Class I). For Unit-Linked and multi-class categories, at the Insurance Group level, the percentage of investment options classified under Articles 8 and 9 over the total investment options available in products open to new subscriptions increased from 72% at the end of 2022 to approximately 80% at the end of 2023.

More specifically, Intesa Sanpaolo Vita launched on the market a new Multi-class product (“Patrimonio Profilo”, placed by the Banca dei Territori network) with Article 8 investment options and enriched the Multi-class Synthesis, placed by the Intesa Sanpaolo Private Banking network, with new external and internal funds classified as Article 8.

Fideuram Vita expanded its investment options underlying the Unit Linked products (Fideuram Vita Futura and Fideuram Vita Insieme family products) and Multi-class products (Fideuram Vita Sintonia and Fideuram Vita Gemini), through the inclusion of a wide selection of internal and external funds classified by the respective management companies as Articles 8 and 9. These interventions made it possible to reclassify as Article 8 all the products of the Fideuram Vita Insieme family, the multi-class products and the various internal funds.

With regard to Intesa Sanpaolo Life, the offer distributed throughout Italy includes, as of March 2023, all the products on the market classified as Article 8.

In October, the products placed in Spain were also underwent some changes that allowed them to be reclassified as Article 8.

With regard to its Class I products, Intesa Sanpaolo Vita placed three products connected to a newly established Separate Management, Base Performance, already established in line with the ESG investment policy and therefore classified as Article 8.

⁽²³⁾ On 1 December 2023, Intesa Sanpaolo Life merged into Intesa Sanpaolo Vita with an extraordinary merger transaction

Also in the “Savings and Investment” area, some proposals were made targeting specific customer segments:

- “Tu Dopo di Noi” (You After Us) from Intesa Sanpaolo Vita, an insurance product made for the members of a disabled person’s family who want to protect their loved one with a secure capital for the future or with a certain income in the event of the death of the signatory;
- “Base Sicura Tutelati” (Secure Base for the Protected), an insurance product dedicated exclusively to protected persons such as minors and/or incapacitated persons who wish to invest a capital sum, while protecting it with a typical Class I guarantee and who require the prior authorisation of a Guardianship Judge;
- “Polizza Riservata” (Confidential Policy), a Class I insurance product dedicated to the world of the “third sector”.

With regard to the scope of “Complementary Pension Fund” products, the following are worth of note:

- “Il Mio Domani” (“My Tomorrow” - an open-ended pension fund from Intesa Sanpaolo Vita with individual membership) which presents, among others, three lines of investment with ESG benchmarks, classified as Article 8, and a lifecycle investment profile that provides for the allocation of the most compliant starting sub-fund, based on the time horizon before reaching one’s retirement date;
- “Fondo Pensione Fideuram” (a pension fund open to individual members of Fideuram Vita), classified as Article 8, which provides, in the investment policy, for the maintenance of a minimum level of ESG ratings and certain exclusion criteria (issuers operating in sectors not considered socially responsible, issuers that do not comply with good governance practices).

Within the scope of the Non-Life Business, the Insurance Group is active with the companies Intesa Sanpaolo Assicura, Intesa Sanpaolo RBM Salute, with products covering Mobility (cars and motorcycles), the Home (theft, fire, etc.), Health (accidents, illness) and SME/Corporate sectors.

The Motor insurance product called “ViaggiaConMe” (TravelWithMe) is a usage-based solution which encourages policyholders to use their vehicles responsibly, reducing their premiums if they lower their mileage (monitored using a device installed in the car). It also provides for the protection of the vehicle in the event of natural disasters such as tornadoes, hurricanes, floods, storm surges, landslides, landslips, hail or snow and earthquakes. The car-window guarantee during 2023 was extended to cover damage from natural events.

The “XME Protezione” (Protection for Me) product is a policy with a range of insurance covers in the areas of Health, Home and Family that the customer can purchase, also at different times, customising protection according to their needs. In addition to the traditional cover dedicated to the home, XME Protezione includes the possibility of protecting the home in the event of natural disasters such as earthquakes and floods, providing compensation of up to 80% of the reconstruction value.

In line with the objective of the 2022-2025 Business Plan to strengthen its position in non-motor non-life insurance, Intesa Sanpaolo Assicura increased its exposure to Earthquake and Flood coverage reaching 35 billion euro at the end of 2023 (33.5 billion euro at the end of 2022).

The XME Protezione product also provides cover for the payment or reimbursement of medical expenses in the event of an accident or illness, which includes events such as hospitalisation or surgery, but also specialist visits, instrumental diagnostics, physiotherapy or ophthalmology, and built-in prevention programmes aimed at protecting customers’ health prior to the emergence of the most common diseases. The XME Protezione health offer also includes coverage dedicated to senior customers (over 65) who, as a result of certain events, find themselves in temporary difficulty. The attention paid to the senior segment is also confirmed through extending the age for coverage to 90 years for the hospital admittance and operation module. As regards the modules offered as part of XME Protezione, it is also worth mentioning the Caregiver module dedicated to covering risks deriving from unforeseen events (illness, accident or inability to return home from a trip) that prevent a Caregiver from providing his/her non-professional assistance in favour of their over-65 loved ones. In such cases, the Company makes health and social care workers available who assist the Insured to ensure the continuity of services.

For small and medium-sized enterprises, in the current “Tutela Business” offer with policies for Traders, Manufacturing, Agriculture, Offices and Professional Firms, there is cover dedicated to climate risks to protect against non-catastrophic natural events (weather events guarantee) and civil liability for damage to property resulting from air, water and soil pollution.

In November 2023, the two products “Tutela Business Manifattura e Commercio” (Business Trade and Manufacturing Protection) were significantly revised, and the possibility of extending fire and other material events cover was offered through the purchase of the catastrophic events cover that provides for the ever-present earthquake guarantee and the additional flood, inundation, and flooding guarantee. The insured has the right to choose between two different compensation limits of the insured sum: 80% or 50%. One element that characterises these products is the “Anticipo indennizzo” (Compensation Advanced Payment): 30 days after filing a claim, the Insured may request an advance of 50% of the presumed compensation if the damage ascertained

by the Company is greater than 15,000 euro and if there are no disputes about the claim. The Company will pay the compensation advance within 30 days of receipt of the request.

The sale of the “RC Ambientale” (Environmental Civil Liability) product launched at the end of 2022 continued in 2023 with more than 1,700 policies sold. The policy provides cover for civil liability arising from damage to the environment that the company may cause in relation to its business activities, in particular in the event of damage to the environment or an imminent threat thereof. The undersigned undertakes to comply with basic technical requirements that represent best practices in the management of risks of damage to the environment. With this in mind, companies are encouraged to improve the management of their risks.

In the context of health protection to support companies and their corporate welfare, Intesa Sanpaolo Assicura offers the “Collettiva Infortuni” (Collective Accident) Policy that protects one or more categories of workers in the event of an accident while performing professional and extra-professional activities. Traditionally uninsurable categories of workers such as interns, trainees and co-workers with a contract of collaboration are also covered. The range of protection in this area is completed by two insurance solutions offered by Intesa Sanpaolo RBM Salute reserved for companies and aimed at protecting workers and their families: one to cover the risks associated with serious illnesses, and the other takes the form of a health plan which reimburses medical expenses.

SUSTAINABILITY INITIATIVES IN THE FIELD OF CLAIMS

During the year 2023, Intesa Sanpaolo Assicura reviewed its claims processes with a view to greater environmental awareness, favouring less use of paper during the phase of filing a claim (via the Insurance APP, emails and call centre) and its management (the file can be viewed fully on screen). Alternative damage quantification tools (remote video appraisal) have been introduced, reducing environmental impacts. Whenever possible, appraisers use electric vehicles in large urban centres when moving from place to place to carry out damage assessments. Finally, the bodywork-repair networks were the subject of a programme of raising awareness about preferring damage repairs rather than replacing components and on the use of green materials.

SOCIAL AND ENVIRONMENTAL INITIATIVES AND PROMOTION OF AN INSURANCE CULTURE

The Insurance Group continued its constant commitment to social and environmental sustainability issues with the aim of producing a concrete and positive impact on society, implementing initiatives to support ecological transition and categories of individuals in conditions of economic or social hardship in collaboration with partners, foundations and specialised, locally active organisations.

The commitment to promote and disseminate the insurance culture also continued in 2023, with the implementation of initiatives aimed at filling the “protection gap” of Italian Millennials and promoting increasingly responsible and sustainable behaviours, with the aim of disseminating among them a conscious and reasoned approach to risk management and an understanding of the consequent value for the individual and the family unit.

The initiatives were carried out through the In Action ESG programme, divided into three sections (In Action ESG NEET, In Action ESG CLIMATE, In Action ESG POOL).

Through In Action ESG NEET, in collaboration with the Dynamo Foundation, professional-training programmes were offered dedicated to the promotion and inclusion in the world of work of young people living in situations of social, economic or family hardship, with a focus on certain regions in Italy. More specifically, through professional qualification activities relating to professional roles in the field of caring, care and support for the frail, the initiative allows NEETs to resume training and be introduced into the world of work through training placements and job assistance. At the end of the year 2023, the programme saw the start of 8 classes in Tuscany, Campania and Lazio that involved a total of 112 people. According to the first available data, 77% of NEETs find a job and/or resume a course of study within a few months from completing the programme.

“In Action ESG CLIMATE”, on the other hand, is a programme in collaboration with Intesa Sanpaolo Innovation Center S.p.A. started in 2022 in the form of a call for ideas and re-proposed in 2023, which aims to promote the development of new concrete solutions to combat climate change and support ecological transition through assistance to Italian entrepreneurship (e.g. young companies, SMEs, etc.). The programme provides for the allocation of a total financial contribution of 500 thousand euro to the best projects and solutions selected on the basis of the positive impact they may have on ecological transition: candidates must submit a plan outlining the solid detailed use of the awarded resources which is then monitored over the following twelve months. The 2023 edition had a great response with about 140 projects and, given the quality and potential of the solutions analysed,

in addition to the 1st and 2nd prizes, two 3rd prizes were awarded ex aequo, raising the total contribution from the original sum of 500,000 to 600,000 euro and divided up as follows:

- 1st prize 250,000 euro
- 2nd prize 150,000 euro
- 3rd prize ex aequo 100,000 euro each

The monitoring activities, carried out by the Insurance Group in relation to the awarded contributions and, in particular, with reference to the prize-winners in the 2022 edition (who have completed their projects), have highlighted the concrete and tangible effect of the awards on the winning companies' projects, in particular with regard to the growth of their turnover, workforce and research and development. These award-winning companies also enjoyed significant improvements in growth and appreciation among institutional investors and industrial partners.

Finally, through the "In Action ESG POOL", the online community of Life Companies in the Insurance Group, "La Sfida" (The Challenge) was launched at the beginning of 2023, a contest that aimed to disseminate the value of protection and the insurance culture and make it clear that insurance and welfare tools can be valuable allies of the new generations. "La Sida" took the form of ten comic episodes, from January to March 2023, about situations in daily life providing useful suggestions on the insurance world. The game provided an opportunity to understand in an innovative and fun way the importance of certain virtuous behaviours in insurance protection choices.