

Information pursuant to Article 4 of Regulation (EU) 2019/2088 on sustainability disclosures in the financial services sector

Statement on principal adverse impacts of investment decisions on sustainability factors

Financial market participant – Interamerican Hellenic Insurance Company S.A.

Summary

INTERAMERICAN Hellenic Insurance Company S.A. (hereinafter "INTERAMERICAN" or "Company") considers principal adverse impacts of its investment decisions on sustainability factors.

This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January to 31 December 2024.

These factors cover issues related to the environment, society, labor, human rights, as well as action against corruption and bribery. In the context of its investment actions and in alignment with the legislative provisions, the Company seeks to limit the principal adverse impacts caused by its investment decisions. The degree and manner in which principal adverse impacts are incorporated into the investment process depends on various factors, including the type of fund or strategy, the asset class and the availability of reliable data.

INTERAMERICAN, as a member of the Achmea Group, does not simply focus on the aforementioned impacts on sustainability factors, but has established sustainability as a central element in its management and operational initiatives. The Company supports the Group's ambition for a climate-neutral business operation by 2030, climate-neutral investments by 2040 and climate-neutral products by 2050.

Regarding its investment activities, INTERAMERICAN follows the guidelines of Achmea Group, the Asset Liability Management (ALM) study, the Investment Policy as well as other related policies of the Group. At the same time, INTERAMERICAN's asset management is mainly carried out in-house, with only a small portion being placed through mutual funds with external asset managers.

INTERAMERICAN manages a portfolio of direct investments, mainly in bonds (government and corporate), stocks, mutual funds and cash. In addition, life insurance products linked to investments (Unit-Linked) refer to products that allow the policyholder to choose, through a list of mutual funds of asset management companies, those that correspond to his preferences and needs.

INTERAMERICAN takes sustainability risks into account when making investment decisions, mainly through its investment policy and its socially responsible investment policy, which include various qualitative and quantitative criteria with the aim of more effective risk management, and therefore the safeguarding of capital of customers.

These criteria include the harmonization of bond issuers with environmental, social and corporate governance criteria (hereinafter "ESG criteria"). As most of the portfolio is placed in highly rated government bonds based in the European Union, several credit rating agencies take ESG criteria into account extensively; therefore INTERAMERICAN's investment decisions already include the evaluation of these criteria. Additionally, when selecting issuers of securities, the Company excludes those who belong to specific professional activities or countries that are not in line with its corporate policy and philosophy. In particular, in the selection of corporate bonds, the majority of which are also of high credit rating, the activities that will be financed from the capital raised by each issuer (use of proceeds) are taken into account.

In order to assess the sustainability risks of mutual funds originating from external asset managers, INTERAMERICAN includes in the investment selection process a quality ranking system for sustainability factors. Specifically, the process includes a review of each external asset manager's ESG philosophy and sustainability report, if available, to determine a score, which is then included in the model's weighted average to determine the final list of investments.

This report presents indicators that measure adverse sustainability impacts. Of these indicators, the first fourteen refer to investments in corporate entities and are mandatory for financial market participants, who are required to submit relevant reports. In addition, they should choose at least two more indicators from a list included in the annex to Article 4 of the Sustainability Regulation. The fourteen mandatory indicators are presented in Table 1.

The first category refers to "Indicators applicable to investments in companies", which includes climatic and other environmental indicators, as well as indicators related to social and personnel issues, respect for human rights and the fight against corruption and bribery. The second category refers to "Indicators applicable to investments in sovereigns and supranationals" and the third to "Indicators applicable to investments in real estate assets". Also, regarding the optional indicators, INTERAMERICAN has chosen four of them. Specifically, as shown in Tables 2 and 3, the indicators fall under the following categories: "Additional climate and other environment-related indicators" and "Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters".

It is noted that due to the limited availability and quality of data, the determination of quantitative targets is a challenge. In order to achieve the goals and comply with the investment frameworks mentioned above, it is necessary to constantly monitor and examine the indicators, as well as to analyze possible measures to improve them.

In its endeavor to compile in a more accurate manner the following information, INTERAMERICAN relies on the current interpretation of the Regulation, the available technical standards ("RTS") as well as the clarifications and guidelines published by the competent

authorities at the time of publication of this statement. The available guidelines naturally carry a relative margin of interpretation and are continually adapted to the needs of this framework. Considering the above facts, the Company pays special attention to the relevant developments and undertakes to adjust its approach accordingly, based on the applicable assumptions and methodology.

It is noted that the Greek version of this statement is the original. In case of any inconsistencies between the two versions, the Greek version is to be followed.

Description of the principal adverse impacts on sustainability factors

Table 1						
Indicators applicable to investments in investee companies						
Adverse sustainability indicator	Metric	Impact 2024	Impact 2023	Explanation	Actions taken, and actions planned and targets set for the next reference period	
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS						
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	48.664,54 tCO ₂	24.307,42 tCO ₂	The overall exposure of the portfolio increased in 2024. Due to its composition of well-established companies with strong fundamental value, it demonstrates a reduction in greenhouse gas (GHG) emissions intensity per EVIC. The final outcome is higher (mainly due to the removal of EVIC).	INTERAMERICAN will monitor the progress of this indicator and will consider possible measures to improve it.
		Scope 2 GHG emissions	9.827,39 tCO ₂	3.018,02 tCO ₂	The disclosed data of the investee companies have increased. Furthermore, our exposure to specific energy companies has also slightly increased, further contributing to the overall impact.	INTERAMERICAN will monitor the progress of this indicator and will consider possible measures to improve it.
		Scope 3 GHG emissions	416.668,59 tCO ₂	606.432,11 tCO ₂	Certain companies (e.g., in the energy sector, etc.) were replaced within the portfolio, which contributed to the reduction of greenhouse gas emissions.	INTERAMERICAN will monitor the progress of this indicator and will consider possible measures to improve it.
		Total GHG emissions	475.111,80 tCO ₂	633.757,58 tCO ₂	The composition of the overall portfolio has led to a reduction in the overall indicator.	INTERAMERICAN will monitor the progress of this indicator and will consider possible measures to improve it.
	2. Carbon footprint	Carbon footprint	674,07 tCO ₂ e /M€ of EVIC	1.065,29 tCO ₂ e /M€ of EVIC	The portfolio has been restructured through the	INTERAMERICAN will monitor the progress of this indicator and

					replacement of specific energy companies, resulting in a reduction of the indicator.	will consider possible measures to improve it.
	3. GHG intensity of investee companies	GHG intensity of investee companies	836,29 tCO ₂ /M€ revenue	2.097,35 tCO ₂ /M€ revenue	The portfolio has been restructured through the replacement of specific energy companies, resulting in a reduction of the indicator.	INTERAMERICAN will monitor the progress of this indicator and will consider possible measures to improve it.
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	9,96%	8,68%	The portfolio's exposure to a specific energy company increased, slightly affecting the indicator.	INTERAMERICAN will monitor the progress of this indicator and will consider possible measures to improve it.
	5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources	83,87%	67,48%	The composition of the portfolio, combined with the increase in disclosed data, impacted the metric.	INTERAMERICAN will monitor the progress of this indicator and will consider possible measures to improve it.
	6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	0,00 GWh/M€	0,00 GWh/M€	The portfolio's composition ensures investments in sectors and companies with low energy consumption relative to their revenues, without significant changes during 2024.	INTERAMERICAN will continuously monitor the indicator's progress and assess potential improvement actions as needed.
Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	0,00%	0,00%	Based on the disclosed data, the portfolio does not include companies that negatively impact biodiversity.	INTERAMERICAN will continuously monitor the indicator's progress and assess potential improvement actions as needed.

Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	110,42 t/M€ of EVIC	662,13 t/M€ of EVIC	While the overall disclosed data of the investee companies increased, a specific company in the energy sector significantly reduced its emissions, positively impacting the metric overall.	INTERAMERICAN will monitor the progress of this indicator and will consider possible measures to improve it.
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	6,65 t/M€ of EVIC	1,20 t/M€ of EVIC	The disclosed data of the investee companies increased significantly (mainly from a single issuer). Additionally, the inclusion of a domestic equity slightly contributed to the indicator's increase.	INTERAMERICAN will monitor the progress of this indicator and will consider possible measures to improve it.
INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS						
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	10,54%	9,95%	In 2024, the portfolio gradually replaced 3 out of the 5 companies that had reported violations in 2023. However, the increased exposure to the remaining companies slightly affected the indicator.	INTERAMERICAN will monitor the progress of this indicator and will consider possible measures to improve it.
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance/complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	2,00%	0,00%	The portfolio restructuring, following the sale of a large number of equities in 2023 reduced the total companies with established monitoring processes, thereby impacting in the metric.	INTERAMERICAN will monitor the progress of this indicator and will consider possible measures to improve it.

	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	17,56%	15,05%	The portfolio increase towards the banking sector versus other sectors impacted the metric.	INTERAMERICAN will monitor the progress of this indicator and will consider possible measures to improve it.
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	40,75%	39,61%	The portfolio increase towards the banking sector, having extended disclosed data versus other sectors, impacted the metric.	INTERAMERICAN will monitor the progress of this indicator and will consider possible measures to improve it.
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0%	0%	INTERAMERICAN follows the Group's investing guidelines regarding the exclusion of certain entities and sectors. The specific sector has been designated as excluded in accordance with the current policies of the Achmea Group.	INTERAMERICAN will continuously monitor the indicator's progress and assess potential improvement actions as needed.
Indicators applicable to investments in sovereigns and supranationals						
Adverse sustainability indicator		Metric	Impact 2024	Impact 2023	Explanation	Actions taken, and actions planned and targets set for the next reference period
Environmental	15. GHG intensity	GHG intensity of investee countries	0,11 tCO ₂ /kUSD	0,10 tCO ₂ /kUSD	The increase in greenhouse gas (GHG) emissions intensity is mainly attributed to the portfolio's higher allocation to government bonds from Southern European countries, with Portugal showing the highest rate of increase in CO ₂ emissions per GDP in 2024. Additionally, Greece is a main contributor due to the increased portfolio exposure.	INTERAMERICAN will monitor the progress of this indicator and will consider possible measures to improve it.

Social	16. Investee countries subject to social violations	Absolute number of investee countries subject to social violations, as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	0	0	No investment in countries subject to social violations, as referred to in international treaties and conventions, United Nations principles and, where applicable, national law.	INTERAMERICAN will continuously monitor the indicator's progress and assess potential improvement actions as needed.
		Relative number of investee countries subject to social violations, as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	0%	0%	No investment in countries subject to social violations, as referred to in international treaties and conventions, United Nations principles and, where applicable, national law.	INTERAMERICAN will continuously monitor the indicator's progress and assess potential improvement actions as needed.

Indicators applicable to investments in real estate assets

Adverse sustainability indicator		Metric	Impact 2024	Impact 2023	Explanation	Actions taken, and actions planned and targets set for the next reference period
Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	0%	0%	No real estate investment involved in the extraction, storage, transport or manufacture of fossil fuels as per applicable Group guidelines.	INTERAMERICAN will continuously monitor the indicator's progress and assess potential improvement actions as needed.
Energy efficiency	18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets	100%	100%	All real estate assets of IAG are in this category.	INTERAMERICAN will continuously monitor the indicator's progress and assess potential improvement actions as needed.

Other indicators for principal adverse impacts on sustainability factors

Table 2

Additional climate and other environment-related indicators

Adverse sustainability impact	Adverse impact on sustainability factors (qualitative or quantitative)	Metric	Impact 2024	Impact 2023	Explanation	Actions taken, and actions planned and targets set for the next reference period
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Indicators applicable to investments in investee companies

CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS						
Water, waste and material emissions	9. Investments in companies producing chemicals	Share of investments in investee companies the activities of which fall under Division 20.2 of Annex I to Regulation (EC) No 1893/2006	0%	0%	No investments in chemical producing companies.	INTERAMERICAN will continuously monitor the indicator's progress and assess potential improvement actions as needed.
Table 3 Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters						
INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS						
Adverse sustainability impact	Adverse impact on sustainability factors (qualitative or quantitative)	Metric	Impact 2024	Impact 2023	Explanation	Actions taken, and actions planned and targets set for the next reference period
Indicators applicable to investments in investee companies						
Social and employee matters	7. Incidents of discrimination	1. Number of incidents of discrimination reported in investee companies expressed as a weighted average	0,00	0,00	No results available due to the absence of recorded data from the new provider.	INTERAMERICAN will continuously monitor the indicator's progress and assess potential improvement actions as needed.
Human Rights	14. Number of identified cases of severe human rights issues and incidents	Number of cases of severe human rights issues and incidents connected to investee companies on a weighted average basis	0,00%	0,00	No results available due to the absence of recorded data from the new provider.	INTERAMERICAN will continuously monitor the indicator's progress and assess potential improvement actions as needed.
Anti-corruption and anti-bribery	16. Cases of insufficient action taken to address breaches of standards of anti-corruption and anti-bribery	Share of investments in investee companies with identified insufficiencies in actions taken to address breaches in	0,00%	0,00%	No results available due to the absence of recorded data from the new provider.	INTERAMERICAN will continuously monitor the indicator's progress and assess potential improvement actions as needed.

		procedures and standards of anti-corruption and anti-bribery					
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Description of policies to identify and prioritise principal adverse impacts on sustainability factors

Achmea Group, and by extension the Company, applies a due diligence policy to identify, prioritize and evaluate the principal adverse impacts of investment decisions on sustainability factors. In addition, INTERAMERICAN checks whether the activities comply with international standards, such as the "Global Compact" initiative of the United Nations Organization (UN Global Compact), the guidelines of the Organization for Economic Cooperation and Development for multinational enterprises (OECD Guidelines for MNEs) as well as the guiding principles of the United Nations Organization for business and human rights (UN Guiding Principles on Business and Human Rights). In particular, it checks whether human rights, labor and environmental standards and anti-corruption and anti-bribery rules are being violated.

As far as corporate bonds are concerned, the choice is based on the examination of the reason for issuing the bonds and the way in which the funds are used by the respective issuer. Priority is given to bonds characterized as "green" and aimed at the implementation of projects concerning renewable energy sources, energy efficiency, green buildings, prevention and e-control of pollution, environmentally sustainable management of natural resources and land use, as well as the efficient management of water resources. In addition, considering the selection of new bond securities to be included in the portfolio, INTERAMERICAN implements an exclusion policy for issuers or financing projects that contradict its corporate policy and philosophy.

Based on the 10 Principles of the UN Global Compact, INTERAMERICAN excludes indicative industries or investment characteristics related to munitions, chemical, biological and nuclear weapons, mines, tobacco industries, alcohol production, thermal coal release, sand construction tar or other environmentally unfriendly practices, as well as lack of respect for human rights and corruption.

Information regarding the above sustainability indicators is collected with the assistance of Bloomberg for investments in companies, as well as investments in government and supranational entities. For INTERAMERICAN's portfolio, Bloomberg provides information based on disclosures for all listed securities. Regarding investments in real estate assets, the necessary data is supplied by INTERAMERICAN.

Engagement policies

The majority of INTERAMERICAN's portfolio is placed in highly rated government bonds based in the European Union. For this reason, common actions such as the open dialogue with companies to try to shift to more sustainable practices, do not have extensive application for the Company. However, INTERAMERICAN, as part of Achmea Group abides by the engagement approach implemented by the Group as a whole. Specifically, Engagement in Achmea is divided into two separate programmes: i) Normative engagement and ii) Thematic engagement.

Normative engagement

The aim of the normative engagement programme is to stop or prevent structural violations of international standards. It is not hard to foresee direct and indirect financial impacts deriving from such violations, and as such, Achmea is engaged in open dialogue with subject companies to attempt to mitigate any potential cases. If the company fails to stop violating standards and is no longer open to dialogue, it may be excluded from investment and placed on the exclusion list, which is applicable to all Group entities, including INTERAMERICAN.

Thematic engagement

The focus of the thematic engagement is not on companies that violate standards (as above) but on companies that can improve their financial and social performance on specific themes. Engagement is conducted in those themes that are aligned with Achmea's key themes. The current engagements vary from good and accessible medicine, climate and biodiversity to healthy food. The basis for conducting such engagements is found in Achmea's Engagement Guidelines which take into account international treaties and initiatives to formulate a suitable approach. Achmea applies an escalation strategy in the event that an engagement with a company from the engagement programmes makes insufficient progress. Once some time has elapsed and after several escalation steps have failed to yield sufficient results, the company may be excluded from investment (at Group level).

References to international standards

INTERAMERICAN's commitment to sustainability is enhanced by the Company's long-standing commitment to key industry initiatives.

Since 2008, as a founding member of the competent body in Greece, INTERAMERICAN is committed to incorporating the 10 Principles of the UN Global Compact in its policies and procedures, while since 2019 it is also a founding member of the representative body of Compact in Greece, Global Compact Network Hellas.

Committed to running a responsible organization, the Company participates in the UN Environment Program Finance Initiative, having also signed the Principles for Sustainable Insurance (PSI UNEPFI). At the same time, it participates in the Greek Code of Sustainability, which is a structured reference system in terms of the transparency and self-commitment of organizations in matters of sustainable development and responsible entrepreneurship. Based on this system, the Company is ranked among the "most sustainable companies".

Finally, it is noted that the sustainability practices implemented in the Company are guided (directly or indirectly) by the 17 UN Sustainable Development Goals (UN SDGs).

Historical comparison

This document, as mentioned above, constitutes the Statement on the principal adverse impacts of investment decisions on sustainability factors and examines the period from January 1 to December 31, 2024. The portfolio composition as well as the changes regarding the disclose data affected the final shape of the indicators, as explained in the tables above. For comparison reasons and following the data provider replacement the 2023 metrics are recalculated.

Regarding the Unit Linked products and Mutual Funds, INTERAMERICAN, remaining faithful to its commitment to provide accurate and meaningful information, makes every effort to gather more data on the principal adverse impacts of investment decisions on sustainability factors and to reassess the situation. The limitations of data are attributed both to the absence of relevant data from the managers of the portfolios in scope and to their limited availability, despite our efforts to collect the necessary data and negotiations with the relevant mutual fund management companies as a no look through approach is applied. As the availability of information provided by mutual fund management companies increases and the quality of the information made available improves, it is expected that the indicators in this statement will gradually be more influenced by the investment decisions and strategies of the owners of life insurance products. linked to investments (Unit-Linked).