



# Principal Adverse Impact Statement

## June 2023

## VidaCaixa, S.A.U.

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### 1. Summary

VidaCaixa, S.A.U. de Seguros y Reaseguros, (hereinafter “VidaCaixa” or “the Entity”) considers the principal adverse sustainability impacts of investment decisions. This statement is VidaCaixa's consolidated statement of the principal adverse sustainability impacts of investment decisions.

This statement relates to the principal adverse sustainability impacts for the reference period from 1 January to 31 December 2022.

The preparation of this statement has followed, to the extent possible, the instructions and format specified in Annex 1 of the regulatory technical standards (“RTS”).

VidaCaixa, as part of the CaixaBank Group, bases its management on responsible action and economic efficiency, with a focus on the sustainable socio-economic development of people and the region. The Entity is aware of the fundamental role played by the financial sector, in relation to both funding and investment, when it comes to channelling resources into the promotion of activities that benefit society as a whole and remains committed to the evolution towards a sustainable economy.

In compliance with the requirements of Regulation (EU) 2019/2088<sup>1</sup> on sustainability-related disclosures in the financial services sector (hereinafter “SFDR”) whose purpose is to promote transparency regarding the way in which financial market participants integrate sustainability risks into investment decision-making and the investment process, VidaCaixa, as a member of the financial market, includes information about the results and plans relating to the due diligence procedures implemented when performing its asset management activity.

VidaCaixa considers the sustainability risks and possible influences of adverse sustainability impacts on its investment processes. The Entity has due diligence processes in place to identify, prevent, mitigate and explain how to address these impacts. For this, it applies the Sustainability Risk Integration Policy and the Engagement Policy.

The Entity systematically analyses and monitors the principal adverse impacts on sustainability factors (hereinafter “PAIS”), adopting the necessary mitigation measures. These measures may include not investing, disinvesting, reducing exposure or observing, initiating the engagement actions that, where appropriate, are considered necessary.

This statement shows the average monthly value of the PAIS indicators for VidaCaixa's positions in basic investment products (BIPS) and pension plans (including bonds and corporate equity, as well as public debt), including both direct investment and third-party vehicles, which had an average capital in 2022 of €85,569 million for the purposes of the SFDR Regulation.

The results of the PAIS indicators in this statement relating to the 2022 financial year are not comparable with the results published in the Principal Adverse Impact Statement <sup>2</sup> for the previous financial year 2021. That is due to developments in the calculation methodologies for the indicators, as well as the change in the scope and perimeter of the data disclosed between this financial year and the previous one.

<sup>1</sup> The Regulation is available at the following link [EUR-Lex - 32019R2088 - EN - EUR-Lex \(europa.eu\)](#)

<sup>2</sup> The previous Statement can be consulted at the following link [VidaCaixa policies | Corporate governance - VidaCaixa](#)

## 2. Description of the Principal Adverse Sustainability Impacts

The results for the indicators have been obtained from the information provided by the supplier of the data, MSCI Inc. Currently, the information used for the indicators includes exposure to both direct investment and third-party vehicles.

The coverage for these indicators is around 80%, unless indicated otherwise in the table below.

### INDICATORS APPLICABLE TO INVESTMENTS IN INVESTEE COMPANIES

#### CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

Adverse sustainability indicator	Metric	2022 Impact	Explanation	Actions taken, and actions planned and targets set for the next reference period
Greenhouse gas emissions <sup>3</sup>	<b>1. Greenhouse gas emissions</b> (GHG emissions)	Scope 1 GHG emissions	1,941,572.8	
		Scope 2 GHG emissions	402,969.8	
		Scope 3 GHG emissions	13,389,481.0	
	Volume of GHG emissions produced by VidaCaixa investee companies. Sum of absolute CO <sub>2</sub> emissions, whether disclosed or estimated, calculated according to the value of the investment in each company. (tCO <sub>2</sub> e)	Total GHG emissions (sum of scopes 1, 2 and 3)	15,727,784.0	
	<b>2. Carbon Footprint</b> (tCO <sub>2</sub> e/million EUR EVIC)	GHG emissions of the investee companies per million euros of value of the company	450.6	
	<b>3. GHG intensity of investee companies</b> (tCO <sub>2</sub> e/million EUR sold)	GHG emissions of the investee companies per million euros of sales	1,003.1	
Biodiversity	<b>4. Exposure to companies active in the fossil fuel sector</b> <sup>4</sup> (%)	Share of investments in companies active in the fossil fuel sector	9.4	
	<b>5. Share of non-renewable energy consumption and production</b> (%)	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources (expressed as a percentage of total energy sources)	66.3	
	<b>6. Energy consumption intensity per high impact climate sector</b> (GWh per million EUR of revenue)	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	1.1	Indicator has low coverage (41%) since data is not available for some of the companies
	<b>7. Activities negatively affecting biodiversity - sensitive areas</b> (%)	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	0.1	
Water	<b>8. Emissions to water</b> (Tonnes of emissions to water/Million EUR invested)	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	53.2	Indicator has low coverage (9%) since data is not available for some of the companies
Waste	<b>9. Hazardous waste and radioactive waste ratio</b> (Tonnes of hazardous waste and radioactive waste/Million EUR invested)	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	8.3	Indicator has low coverage (40%) since data is not available for some of the companies

#### INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS

<sup>3</sup> Scope 1 refers to emissions produced directly by the activity of investee companies; Scope 2 refers to emissions produced indirectly, arising from the energy consumed by investee companies; and Scope 3 refers to the emissions from the investee company's value chain that are not under its control.

<sup>4</sup> Companies active in the fossil fuel sector are understood as companies that derive revenues from the (i) exploration, extraction, distribution or refining of hard coal and lignite; (ii) exploration, extraction, distribution (including transport, storage and selling) or refining of liquid fossil fuels; and (iii) exploration and extraction of gaseous fossil fuels or their specific distribution (including transport, storage and selling). The indicator does not currently take into account the percentage that the investee company devotes to activities related to fossil fuels. A company with a minimum percentage of exposure to this sector will have the same weight for the indicator as a company with a higher percentage of exposure.

Adverse sustainability indicator		Metric	2022 Impact	Explanation	Actions taken, and actions planned and targets set for the next reference period
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation 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	0.5	This corresponds to the perimeter of third-party funds	As indicated in the Sustainability Risk Integration Policy, dialogue is established with managers when these positions are identified.
	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	38.4	The supplier considers that the OECD Guidelines for Multinational Enterprises have been violated when there is no public policy	
	12. Unadjusted gender pay gap (%)	Average unadjusted gender pay gap of investee companies	15.3	Indicator has low coverage (28%) since data is not available for some of the companies	
	13. Board gender diversity (%)	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members <sup>5</sup>	34.7		
	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	0.1	This corresponds to the perimeter of third-party funds	As indicated in the Sustainability Risk Integration Policy, dialogue is established with managers when these positions are identified

INDICATORS APPLICABLE TO INVESTMENTS IN SOVEREIGNS AND SUPRANATIONALS

Adverse sustainability indicator		Metric	2022 Impact	Explanation	Actions taken, and actions planned and targets set for the next reference period
Environmental	15. GHG intensity (tCO <sub>2</sub> e/billion of GDP)	GHG intensity of investee countries	263.1		
Social	16. Investee countries subject to social violations (%)	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	0.0	For this indicator, in this statement the data exclusively refers to direct positions, due to a lack of coverage of this data for third-party funds.	

INDICATORS APPLICABLE TO INVESTMENTS IN REAL ESTATE ASSETS

Adverse sustainability indicator		Metric	2022 Impact	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		
Energy Efficiency	18. Exposure to energy-inefficient real estate assets (%)	Share of investments in energy-inefficient real estate assets	71.7		

<sup>5</sup> Average ratio of females on the boards of investee companies

Other indicators for principal adverse impacts on sustainability factors

ADDITIONAL CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

Adverse sustainability indicator		Metric	2022 Impact	Explanation	Actions taken, and actions planned and targets set for the next reference period
Emissions	4. Investments in companies without carbon emission reduction initiatives (%)	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	27.9		

ADDITIONAL INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS

Adverse sustainability indicator		Metric	2022 Impact	Explanation	Actions taken, and actions planned and targets set for the next reference period
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	0.0		

### 3. Description of policies to identify and prioritise the influence of the Principal Adverse Sustainability Impacts

VidaCaixa has developed a holistic framework for sustainable investment that applies in the investment process.

This sustainable investment framework is based on the three essential pillars:

1. The explicit and systematic inclusion of environmental, social and governance (“ESG”) considerations when analysing investments and making investment decisions, together with the traditional financial criteria. As a result, managers will consider the sustainability risks in the investment processes, as well as the impact of the corresponding adverse impacts. The ESG factors can be defined as:
  - **Environmental.** Factors related to the quality and functioning of the environment and natural systems, such as air, water and soil quality, carbon and climate, ecology and biodiversity, CO<sub>2</sub> emissions and climate change, energy efficiency, natural resource scarcity and waste management.
  - **Social.** Factors related to the rights, welfare and interests of individuals and communities, such as human rights, working conditions and labour standards, education, gender equality and the prohibition of child and forced labour.
  - **Governance.** Factors related to good governance in companies and other entities it invests in, such as board independence and oversight, best practices and transparency, executive remuneration, shareholder rights, management structure, or anti-corruption and anti-insider trading measures.
2. The Entity's engagement with the investee companies, promoting greater involvement in the corporate governance decisions, through active voting.
3. Open dialogue with the listed companies or issuers of financial products, public or private, in material or controversial ESG-related topics.

#### 3.1 Details on ESG integration in investment analysis

ESG integration is the explicit and systematic inclusion of ESG considerations in the analysis of investments and in investment decision making. In line with that indicated in point 1 of the previous section, when it comes to analysing investment and/or making an investment decision, managers will take into consideration both the sustainability risks and the principal adverse impacts (to the extent that they apply), as defined below:

- **Sustainability risks** are the risks of an event related to sustainability occurring, which could cause a significant negative impact on portfolio performance if it were to occur.
- **Principal adverse sustainability impacts** are negative non-financial ESG impacts that could be caused by the companies or organisations in the investment portfolios.

The ESG integration process seeks to, in short, reduce the effects of sustainability risks and the principal adverse impacts, without losing sight of profit generation.

#### 3.2 The due diligence process

VidaCaixa has risk-based due diligence processes in place to identify, prevent, mitigate and explain how to address these actual and potential negative impacts on its own activities, its supply chain and other business relationships.

In addition, the Entity voluntarily actively participates when it comes to facilitating and channelling changes through its dialogue and active voting policies, wherever this is applicable. As a result, due diligence in its business conduct is also enhanced in the area of investment decisions through specific due diligence measures. In some cases, due diligence can help in deciding whether to continue the activities or investments or discontinue them as a last resort, either because the risk of a negative impact is too high or because mitigation efforts have been unsuccessful.

Bearing in mind that due diligence should be proportionate to the risk and tailored to the circumstances and context of the specific company, the following principles are used in the VidaCaixa investment decision-making processes:

- Identify the actual or potential principal negative impacts.
- Adopt measures to stop, prevent or mitigate these negative impacts.
- Monitor the implementation and results of these measures.
- Report on how to address the principal adverse impacts.

The Entity has introduced a specific procedure designed to perform the appropriate monitoring of compliance with these principles on a regular basis. In practice, the due diligence process is ongoing, iterative and not necessarily sequential, as several steps may be carried out simultaneously with results feeding into each other.

### 3.3 Methodology for the identification of Principal Adverse Impacts

The process for identifying the PAIS forms part of VidaCaixa's investment decision-making process.

Using its own methodology, VidaCaixa analyses, evaluates and monitors adverse sustainability incidents generated by the investments made.

To determine the existence of potential adverse impacts, VidaCaixa assesses the evolution of the PAIS indicators, comparing these to those obtained in the immediately preceding year. An adverse incident on sustainability factors can be said to have taken place when there is evidence of a significant decline in the results for these indicators, or alternatively, for some indicators when certain thresholds established through the CaixaBank Group's policies or procedures are breached, including restrictions on investment under certain criteria or in certain sectors. Specifically, there are policies that ban investment in companies identified as having failed to follow the principles of the United Nations Global Compact (after a process of analysing the cases and assessing the measures to remedy the situation), as well as companies that fail to meet the OECD Guidelines for Multinational Enterprises or that have exposure to controversial weapons.

In any event, if an adverse impact is identified, VidaCaixa will evaluate it on the basis of criteria such as: the reasons why it has taken place, any recurrence and the probability of success in relation to managing it, among others. Similarly, the management and mitigation actions to perform will be assessed and defined, wherever necessary.

Such measures may consist in not investing, disinvesting, reducing exposure or observing. These measures may be supplemented, if necessary, with the exercise of active ownership through engagement actions, such as dialogue and/or exercising voting rights held by the Entity given its stake in the investee company<sup>6</sup>.

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<sup>6</sup> For more information about this type of engagement action, see section "4. Engagement policies" of this document.

## 4. Engagement Policies

In its investment advisory, analysis and management processes, VidaCaixa takes into consideration different ESG policies, its own and those adopted by the CaixaBank Group. These policies constitute a control framework to try to avoid, anticipate or mitigate events that could lead to adverse sustainability impacts. The most relevant Policies are:

### 4.1 Engagement policy (January 2023)

Generally speaking, VidaCaixa is committed to long-term investment. Because of this, it will seek to encourage dialogue with companies or providers of financial products as the primary mechanism to improve the sustainability of the companies it invests in.

This strategy of engagement with listed companies will be implemented with the aim of protecting the exclusive interests of clients and participants at most, with complete independence and objectivity as regards the interests of the CaixaBank Group. This strategy is focused on environmental, social and governance (ESG) aspects, due to the potential to create long-term value for shareholders, and will be implemented according to the provisions of this Engagement Policy, which applies to the group.

In line with its fiduciary duty, and with the aim of being an active owner of the investments it makes, VidaCaixa lays down mechanisms to initiate dialogue actions with companies and providers of investment products, in order to modify identified conduct that could potentially:

- Go against the values of VidaCaixa or its clients and Pension Fund participants.
- Allow for alignment with the strategic opportunities and risks identified by VidaCaixa and the CaixaBank Group, such as climate change and support for the recommendations of the *Task-Force on Climate-Related Financial Disclosures* (TCFD), as expressed in the statement on climate change, as well as the opportunities and risks expressed by the CaixaBank through the Sustainable Development Goals (SDGs).
- Have a negative impact on society, the environment, as well as VidaCaixa's reputation and solvency. In these cases, a dialogue action would also be initiated with the providers of the investment funds affected.
- Involve holding, through investment funds managed by other entities, positions in companies excluded by VidaCaixa or by funds for occupational retirement provision.
- Allow the representation of interests expressed by clients and participants, provided they do not contradict any of the general principle above.

- **Dialogue actions:**

VidaCaixa may establish dialogue actions directly with the providers of the investment products and the companies, or collaboratively with other investors, or through a third-party representative. In this regard, priority will be placed on collaborative actions with other investors as these are considered to have a greater impact on modifying the conduct of companies. If dialogue with the company is chosen, it will always be done while preserving the independence of VidaCaixa and the interests it represents to the extent possible.

For third-party products such as investment funds, aside from the dialogue processes, due diligence will be regularly carried out to assess the ESG integration procedures at the manager level and the investments it makes. Among the aspects analysed, particular attention will be paid to engagement, dialogue and voting mechanisms.

If dialogue with a company does not lead to a favourable outcome, voting will be used as a strategy to continue dialogue actions with the companies according to the progress made (escalation), adopting measures such as supporting proposals by shareholders in favour of greater transparency or better ESG performance or voting against the election (or reelection) of a board member responsible for ESG matters, in case of an adverse impact.

- **Exercise of voting rights:**

VidaCaixa will exercise the voting rights inherent to the listed securities comprising the portfolios managed by it, always for the exclusive benefit of the participants/clients. In any case, the way it will cast its vote will be decided with complete independence and objectivity as regards the interests of the CaixaBank Group.

Attendance and voting rights granted by the listed securities will be exercised directly or delegated to another shareholder or the chairperson of the Board of Directors in whose companies it holds a stake. In any case, when voting, the way the proxy will vote as decided by VidaCaixa beforehand will be binding.

Voting rights will be exercised or delegated as it sees fit in the clients' best interest, taking into account the nature of each corporate resolution under consideration by the General Meeting of Shareholders, based on publicly available information or information that has been made available to shareholders for the General Meeting of Shareholders. The exercising of the right to vote is intended to increase transparency and improve sustainability performance.

## 4.2 Sustainability policies

In addition to the engagement policies, VidaCaixa has its own policies and corporate policies to identify, assess and manage the actual or potential negative impacts. These are set out below:

### Policy on the integration of sustainability risks (January 2023)

In investment management, sustainability risk is defined as any environmental, social or governance (ESG) event or condition that could lead to a material negative impact on the value of the investment if it were to occur. In line with its commitments and values, VidaCaixa integrates ESG aspects in the management of its investments in the insurance business, as well as in the management of the investments of its clients in relation to its activities as a pension fund management company. This Policy is designed to optimise the relationship between risk and return and to avoid, minimise and remedy as far as possible those factors that may result in a significant risk for the environment or the community.

For that, general principles have been established for the introduction of a management framework for environmental and social risk. This will also include those arising from climate change such as physical risks (chronic or acute) and transition risks (technological, market and reputational) and also the detail of its lines of action, which among others include the following issues:

- Monitoring to ensure that the companies in which the group's portfolios invest follow high standards in sustainability policies.
- Encourage sustainability risk mitigation practices in investee companies, directing our voting policy and engagement activities with companies to reduce their ESG risks.

This Policy is corporate in nature, and as a result, the principles of action defined in it are applicable to all the insurance subsidiaries of VidaCaixa that are exposed to sustainability risks.

### VidaCaixa's Code of Ethics and Principles of Action (July 2021)

In line with CaixaBank's Code of Ethics, this Code applies to VidaCaixa and all its employees and executives, as well as the members of its Governing Bodies. This Code reflects VidaCaixa's commitment to carry out its activities in accordance with the strictest legal and ethical standards, and with exemplary standards of professional behaviour, both in the interest of its clients and the community at large.

In this regard, VidaCaixa, as a subsidiary of CaixaBank, supports the latter's mission, which consists in satisfying the financial needs of clients by offering a complete range of suitable products and excellent service quality, with the commitment to bring value to clients, shareholders, employees and society as a whole.

VidaCaixa's principles of action are:

- Compliance with the laws and regulations in force at all times
- Respect
- Integrity
- Transparency
- Excellence and Professional Confidentiality
- Confidentiality
- Corporate Social Responsibility

## Statement on Climate Change (January 2023)

VidaCaixa systematically works with the aim of contributing towards the transition to a carbon-neutral economy by reducing the direct impact of its operations, as well as financing and investing in sustainable projects. In line with this, it has developed the following courses of action:

- Support viable projects compatible with a low-carbon economy and solutions to climate change
- Manage risks that arise from climate change
- Minimise and offset our carbon footprint
- Collaborate with other organisations to move forward together
- Report on our progress in a transparent manner

## VidaCaixa Principles of Action for Sustainability (January 2023)

The Principles of Action for Sustainability define and set out the general principles of action and the main commitments to stakeholders that the CaixaBank Group must follow with regard to sustainability. These principles fall within the scope of the corporate mission and values.

## VidaCaixa's Human Rights Principles (January 2023)

VidaCaixa understands respect for Human Rights as an integral part of its values, and takes on the responsibility of promoting and respecting these rights within its sphere of action. Under this premise, and in keeping with its Code of Ethics and Principles of Action, VidaCaixa operates within a culture of respect for Human Rights, and promotes this way of working among its employees, collaborators, partners and other parties directly related to its operations and products<sup>7</sup>

VidaCaixa's Human Rights Principles sets out the principles of action that the company must follow in this regard, and which must be followed for all relationships it establishes with its employees, clients, shareholders, providers and other business partners, as well as the communities where it does business and carries out activities. This Policy applies to the group, and is aligned with CaixaBank's Human Rights Principles. It applies to VidaCaixa's employees and executives, as well as the members of its Governing Bodies.

The CaixaBank Group is firmly committed to evolving towards a sustainable economy. To this end, it has policies, principles and statements to which all the entities comprising it are committed.

## Corporate Anti-Corruption Policy (September 2021)

VidaCaixa adheres to CaixaBank's Corporate Anti-Corruption Policy, which is mandatory for all the Group companies. The key objective of this Policy consists in preventing the Entity, the Group companies and any external collaborators from engaging in conduct that may be against the law or CaixaBank's basic principles of action, whether directly or through intermediaries. To this end, it seeks to:

- Convey to all members and companies of the Group the commitment to carry out all activities based on respect for the laws and regulations in force, as well as the promotion and defence of the corporate values and principles of action set out in the Code of Ethics.
- Establish standards of conduct that must govern the activities of CaixaBank and the rest of the companies, employees and executives of the Group.
- Assure shareholders, clients, suppliers, judicial bodies and society in general that the CaixaBank Group fulfils its duties of oversight and control over its activities.

<sup>7</sup> For more information on VidaCaixa's commitments to Human Rights, ethical standards and professional behaviour at the international level, please go to Section "5. References to international standards" in this document

## 5. References to international standards

VidaCaixa considers the following international standards as part of its control framework to prevent events that may lead to adverse sustainability impacts, and has signed up to various initiatives in this area that reinforce its management of ESG risks and factors.

The Corporate Human Rights Policy sets out the Group's commitment to abide by the following international declarations:

- The International Bill of Human Rights by the United Nations, which comprises:
  - The Universal Declaration of Human Rights
  - The International Covenant on Civil and Political Rights
  - The International Covenant on Economic, Social and Cultural Rights
  - The European Union Action Plan on Human Rights and Democracy 2020-2024
- The International Labor Organization Declaration on Fundamental Principles and Rights at Work.
- The United Nations Global Compact, incorporating both its Ten Principles and the 17 Sustainable Development Goals ("SDGs").
- The Charter of Fundamental Rights of the European Union.
- The United Nations Guiding Principles on Business and Human Rights
- The OECD Guidelines for Multinational Enterprises.

VidaCaixa also endorses the achievement of the goals of the Paris Agreement through its support of the *Task Force on Climate-Related Financial Disclosures* ("TCFD") and its adherence to *Climate Action 100+*.

Aside from adherence to international standards and codes of business conduct, the Entity made the following sustainability commitments as a sign of its desire to avoid and address the negative impacts associated with investment decision-making.

- **Adherence to the United Nations Global Compact (the "Global Compact"):** It adhered to the Global Compact in 2011. This is the largest voluntary corporate social responsibility initiative in the world, and has two main aims:
  - Incorporate the ten universal principles related to human rights, labour, the environment and the fight against corruption into its strategies and operations.
  - Channel actions in favour of a plan in support of the broadest objectives of the United Nations, including the 17 Sustainable Development Goals ("SDGs"). In this regard, although VidaCaixa integrates the 17 SDGs into its sustainability strategy, contributing to all of them through its activity, social action and strategic alliances, it concentrates its action in four priority goals:
    - SDG 3 - Good health and well-being
    - SDG 5 - Gender equality
    - SDG 8 - Decent work and economic growth, and
    - SDG 13 - Climate Action
- **Adherence to the United Nations Principles for Responsible Investment (PRI):** Compliance with the following principles: incorporating ESG criteria in investment analysis and decision-making processes, incorporating ESG criteria in practices and policies, encouraging the transparency of ESG information among entities, as well as promoting the principles in the investment community, collaboration and improvement in the application of the principles and transparency in the communication of the activities and progress in the application of these principles.
- **Adherence to the Advance initiative promoted by the Principles for Responsible Investment:** It seeks to strengthen the implementation of the United Nations Guiding Principles on Business and Human Rights, through the collective influence of institutional investors.
- **Adherence to the Principles for Sustainable Insurance (PSI):** These principles were developed by the United Nations Environment Programme Finance Initiative (UNEP FI) and constitute a framework of reference for the global insurance sector as it seeks to address environmental, social and governance risks and opportunities and its commitment to adopt four main guiding principles.
- **UN-Convened Net-Zero Asset Owner Alliance:** Commitment to achieve net-zero emissions in the risk-balanced investment portfolio by 2050 (public target), promote dialogue to drive change among the biggest sources of emissions and encourage investment in solutions that contribute towards the transition, among others.

Through the CaixaBank Group's commitments to the different international guidelines, the criteria for business conduct have been set out. These standards cover responsibilities in its actions and the applicable regulations for

its operations in certain sectors, with the aim of mitigating the risk of events that could lead to adverse sustainability impacts.

VidaCaixa regularly carries out the following actions in order to monitor compliance with the policies and commitments:

- Periodic review of the policies/adherence by the governing bodies.
- Supervision of compliance by the relevant bodies.
- Setting of targets and actions plans, where applicable.
- Inclusion of control measures to ensure compliance.
- Reporting on the degree of progress.

## 6. *Historical comparison*

As indicated in point 1 of this Statement, the results of the PAIS indicators provided for the 2022 financial year are not comparable with the results published in the “Statement of Principal Adverse Impacts of investment decisions on sustainability factors”<sup>8</sup> for the previous financial year 2021.

This situation is the result of the following factors:

- The development of the legislation and the methodology for calculating the PAIS indicators.
- Changes in the coverage and quality of the data provided by the data suppliers.
- Finally, changes in the reporting scope and perimeter for the measurement of the PAIS indicators, given that in the previous financial year they were only disclosed for direct investment (corporate bonds, public debt and equity) at the close of 2021.

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<sup>8</sup> The previous Statement can be consulted at the following link [VidaCaixa policies | Corporate governance - VidaCaixa](#)