

Environmental and/or social characteristics

This product: Promotes environmental or social characteristics, but does not have as its objective a sustainable investment

It does not invest in sustainable investments

It invests partially in sustainable investments

Has sustainable investment as its objective. Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

Has a reference benchmark been designated for the purpose of attaining the environmental or social characteristics promoted by the financial product?

Yes

No



1 What environmental and/or social characteristics are promoted by this financial product?

This financial product is an insurance-based investment product. It invests in one or more NOVIS' internal insurance funds under Slovakian law, according to the selection of the policyholder. One of those funds is the NOVIS Sustainability Insurance Fund ("Fund"), which promotes environmental and social characteristics. When this document refers to "this financial product", it means NOVIS Wealth Insuring (GTC-90160801) with selected investment option NOVIS Sustainability Insurance Fund.

Fund invests directly or indirectly into stocks or bonds of companies which comply with strict corporate governance, environmental and social criteria. However, the Fund is generally oriented and does not promote specific environmental or social characteristics. Another aim is to invest into companies which fulfill criteria for impact investments, but such underlying assets are currently not used.

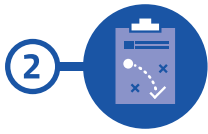
- **What sustainability indicators are used to measure the attainment of the environmental or social characteristics promoted by this financial product?**

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

The Fund uses the United Nations' criteria for ESG investments as a sustainability indicator. In respect of impact investments, the Fund uses the publicly available definitions of impact investments, such as definition by The Global Impact Investing Network¹, when deciding about the selection of investments.

The Fund is not aligned specifically with indicators for adverse impact or OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights, although its underlying financial instruments may reflect these objectives partially as they have to be aligned with principles of responsible investments and UN criteria for ESG investments.

1) Investments made into companies, organizations, and funds with the intention to generate a measurable, beneficial social or environmental impact alongside a financial return - https://thegiin.org/assets/GIIN_AnnualImpactInvestorSurvey_2017_Web_Final.pdf



What investment strategy does this financial product follow

Fund only invests into financial instruments issued by organizations which are signatories of Principles for Responsible Investments (see: www.unpri.org).

- **What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?**

Every issuer of financial instrument must be a signatory of Principles for Responsible Investments.

If the Fund invest indirectly, then in addition the underlying fund must promote environmental or social characteristics or sustainable investments – although sustainable investments are currently not used.

- **How is that strategy implemented in the investment process on a continuous basis?**

This strategy is implemented in the investment process on a continuous basis as part of the quarterly regular review of composition of Fund. Should the regular review show discrepancy between the investment strategy of the Fund and the parameters of financial instruments used in the Fund, NOVIS will apply appropriate remedial measures to make sure the investment strategy is complied with. As an example NOVIS may change the share or financial instruments used in the Fund or replace some or all of them or remove some of them.

- **What is the policy to assess good governance practices of the investee companies?**

To assess good governance practices of the investee companies NOVIS works closely with management of investee companies or, in case of indirect investment via investment fund, monitors the documentation provided by asset manager related to good governance practices of the investee companies.

- **Where can I find further details on the investment strategy?**

More information and further details on the investment strategy can be found on <https://www.novis.eu/en/novis-sustainability-related-information>.

Investment strategies guide investment decisions based on factors such as investment objectives and risk tolerance.

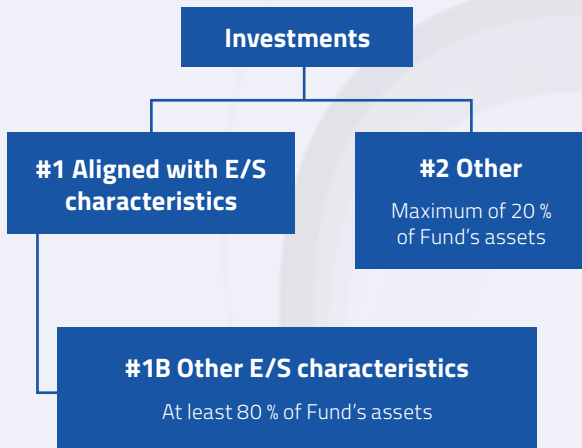
Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



What is the asset allocation planned for this financial product?

Fund invests predominantly indirectly into investment funds compliant with UCITS regulation. Fund's statute defines that share of such indirect investment has to be at least 80 % of Funds assets. Remaining part of Fund's assets can be invested directly into financial instruments such as shares or bonds or into bank deposits.

Asset allocation describes the share of investments in specific assets.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

• **What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Although the basic precondition used in selection of underlying funds is the focus on ESG criteria, the underlying funds may also use investments that do not contribute to the specific environmental or social characteristics promoted by the underlying fund. Examples of these investments are hedging instruments, derivatives used for risk mitigation purposes or bank deposits held as ancillary liquidity. The proportion of these investments usually does not exceed 10 % of Fund’s assets.

Some proportion of the Fund is usually (up to 20% of Fund’s assets) allocated in bank deposits, in order to maintain an adequate level of liquidity. The selection of banks is made without consideration to ESG criteria.

Principal adverse impacts are the most significant negative impact of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.



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Does this financial product take into account principal adverse impacts on sustainability factors?

Yes

No



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Can I find I find more product specific information online?

More product-specific information can be found on the website:

<https://www.novis.eu/en/novis-sustainability-related-information>