

# Sustainability Investment Policy of the Sava Insurance Group



**SAVA**  
INSURANCE  
GROUP

**Contents**

- 1 Purpose and scope ..... 3**
  - 1.1 Purpose..... 3
  - 1.2 Scope ..... 3
- 2 Sustainability goals ..... 4**
- 3 Sustainability risks ..... 5**
- 4 Criteria for the investment exclusion list ..... 5**
- 5 Compliance with legislation, global initiatives and principles promoting sustainability in the investment process ..... 7**
  - 5.1 Legislation..... 7
  - 5.2 Global initiatives and associations ..... 7
- 6 Consideration of principal adverse impacts of investment decisions on sustainability factors ..... 8**
  - 6.1 Methodology for identifying and prioritising principal adverse impacts..... 8
- 7 Active ownership ..... 9**
- 8 Data sources ..... 9**
- 9 Reporting..... 9**
- 10 Transitional and final provisions..... 9**
- 11 Appendices ..... 11**

On the basis of Article 2 of the Rules of Procedure of the Management Board of Sava Re d.d., the Sava Re management board adopted the following document at its session no. 4, held on 28 January 2025:

## Sustainability Investment Policy of the Sava Insurance Group

### 1 Purpose and scope

#### 1.1 Purpose

The Sustainability Investment Policy of the Sava Insurance Group (hereinafter: the policy) sets out a framework for incorporating sustainability factors into investment decisions. The aim is to generate sustainable returns over the long term while minimising negative social and environmental impacts. The Sava Insurance Group (hereinafter: the Group) aims to act as a socially responsible asset and equity manager, acting for the benefit of its customers, stakeholders and the wider community.

The **purpose** of the policy is to govern the Group's approach to the sustainability aspects of investing funds and to embed sustainability risks in the investment process. The policy reflects how the Group pursues sustainable investments, including how it influences the principal adverse impacts of the Group's investment decisions.

The approach is based on:

- consideration of the criteria for not investing in companies involved in business operations that do not promote sustainability aspects (i.e. controversial industries), including consideration of violations of the UN Global Compact (UNGC) principles and the Organisation for Economic Cooperation and Development (OECD) guidelines;
- compliance with regulatory standards, global initiatives and principles promoting sustainability in the investment process;
- consideration of the principal adverse impacts of investment decisions on sustainability factors; and
- the Group's strategic goals.

#### 1.2 Scope

The document refers to the parent company Sava Re d.d. (hereinafter: Sava Re, the parent company or the Company) and serves as a reference document for subsidiaries that together with the parent company constitute the Sava Insurance Group.

The following investment portfolios are **excluded** from the policy:

- portfolios of undertakings for collective investment in transferable securities (hereinafter: investment funds) managed by Sava Infond;
- investments covering unit-linked life insurance liabilities where policyholders' benefits are linked to movements in the net asset value per unit (NAVPU) of the investment funds of the policyholders' choice; and
- investments covering liabilities under investment contracts of Sava Pokojninska Družba (investments supporting the liability funds "My Life-Cycle Funds" for voluntary pension insurance transactions) and pension funds of Sava Penzisko Društvo.

Notwithstanding the above exceptions, the policy may be used as a reference document when developing policies or policy guidelines for investment in mutual funds and/or pension funds and for the creation of sustainable products.

## 2 Sustainability goals

The Group primarily focuses on achieving environmental goals and thereby mitigating climate change, as set out in Regulation (EU) 2020/852 (hereinafter: the EU Taxonomy Regulation). The policy aims to reduce the carbon footprint and greenhouse gas emissions of investments, thus supporting the Group's strategic goal of reducing its carbon footprint. In pursuing this goal, the Group also aims to contribute to the conservation and protection of natural resources, the prevention and control of pollution, the protection of biodiversity and ecosystems, and the promotion of a circular economy.

The Group promotes sustainability through sustainable investment, limiting high carbon activities, actively engaging in and promoting change through active ownership, and reporting and disclosure in accordance with Regulation (EU) 2019/2088 (hereinafter: the SFDR Regulation) and the EU Taxonomy Regulation, as well as through various memberships in international organisations that promote sustainability in investment.

When making investment decisions, the Group considers the principal adverse impacts of investment decisions on sustainability factors in accordance with Article 4 of the SFDR Regulation, which is described in more detail below.

At the same time, the Group also promotes the social dimension and is committed to human rights by excluding activities that harm people, such as tobacco, controversial weapons production, gambling, and similar.

The Group also pays attention to corporate governance by monitoring potential breaches of the UNGC principles and the OECD guidelines, which, among other things, pursue compliance in areas such as bribery and corruption, controversial investments and money laundering.

In the 2023–2027 strategy period, the Group has set two key goals in the area of sustainability in investments, as defined in the applicable Sustainable Development Strategy of the Sava Insurance Group:

- As the first strategic goal, the Group has set a target of increasing sustainable investments in the consolidated portfolio, namely that ESG investments should exceed 20% by 2027. In the case of bonds, the Group considers an investment sustainable\* if it is a green or other ESG bond and the data are obtained from the Bloomberg information system. For mutual funds and ETFs, the Group considers investments as sustainable if the fund manager defines them as investments that operate in accordance with Articles 8 and/or 9 of the SFDR Regulation. In the case of alternative investments, these are considered sustainable if they have a sustainability focus or if the alternative fund manager is a signatory to sustainability initiatives, such as the United Nations Principles for Responsible Investment (UN PRI).

\* The definition of sustainable investment in this policy is not fully consistent with the definition set out in Article 2(17) of the SFDR Regulation.

- As the second strategic goal, the Group has set a target of reducing its carbon footprint by 55% by 2030. This target is also pursued by investing funds with the aim of reducing the carbon footprint by 10% per year. A more detailed method of reducing the carbon footprint is set out in section 4 of this policy.

### 3 Sustainability risks

The Group actively integrates sustainability risks into investment processes in accordance with Delegated Regulation (EU) 2021/1256. This is done by adapting investment processes to effectively identify, assess and manage sustainability risks.

A key part of the sustainable investing approach is to seek to reduce, where possible and feasible, the negative impacts on sustainability factors caused by the investments in which the Group companies engage. These negative impacts are also referred to as principal adverse impacts and can occur in various environmental, social and societal areas (employee rights, human rights, corruption and bribery).

The Group's approach to sustainable investing with the aim of reducing principal adverse impacts and limiting the impact of sustainability risks is based on the following pillars:

- exclusion of companies involved in controversial activities,
- exclusion of companies that violate the UNGC principles and the OECD guidelines,
- the Group's participation in global initiatives and alliances to promote sustainability in the investment process, and
- consideration of the principal adverse impacts of investment decisions on sustainability factors.

When investing in government bonds, the principal adverse impacts are mitigated by monitoring the country's sustainability rating (i.e. ESG rating) provided by MSCI Inc. (MSCI ESG Government Ratings score). If MSCI Inc. rates a country lower than BB, the country will be placed on the investment exclusion list and will not be invested in as an issuer.

When investing in mutual funds, it is preferable to increase the share of investment funds that comply with Articles 8 and/or 9 of the SFDR Regulation or that are defined by the issuer as ESG funds or sustainability funds, but this is not an exclusion criterion.

In the case of alternative funds, compliance with the definition of sustainable investment as set out in section 2 of this policy is considered at the time of acquisition, but this is not an exclusion criterion.

For existing investments that do not have data from the ESG data provider, MSCI Inc., sustainability screening is not possible. In the case of new investments, the necessary data or information to comply with the guidelines of this policy are obtained as part of the due diligence process.

### 4 Criteria for the investment exclusion list

The Group excludes from its potential investment portfolio certain sectors that it does not support or wish to finance and monitors the aspect of human rights violations in accordance with the UNGC principles and the OECD guidelines. In addition, the ESG ratings of countries are followed, taking into account the E, S and G criteria. The criteria for the investment exclusion list are shown in the table below.

**Table 1: Overview and description of excluded industries and practices**

Industry	Criterion for exclusion
Adult entertainment	5% of the issuer's revenue
Tobacco total	5% of the issuer's revenue
Gambling	5% of the issuer's revenue
Controversial weapons	0% of the issuer's revenue
Weapons	5% of the issuer's revenue
Conventional oil and gas	10% of the issuer's revenue
Thermal coal-based power generation	10% of the issuer's revenue
Thermal coal mining	10% of the issuer's revenue
Shale gas	0% of the issuer's revenue
Shale oil	0% of the issuer's revenue
UN Global Compact alignment*	Fail
OECD alignment*	Fail
ESG rating**	Rating below BB

\* A detailed explanation of the criteria reviewed and taken into account by the OECD and the UNGC is provided in appendix 2 to this policy.

\*\* A detailed description of what is covered by the ESG rating can be found in appendix 3 to this policy.

The Group uses data from MSCI Inc. to make calculations and prepare a review of the investment portfolio exclusion list. The assessment of companies' operations in controversial areas is carried out by MSCI ESG Research LLC using its MSCI Business Involvement Screening Research (BISR) service, which provides data on the extent of companies' involvement in products, services, processes or operations that may cause, contribute to or be associated with negative social or environmental impacts. Their approach is based on disclosed activities, disclosed revenue and estimated revenue extrapolated from company disclosures. A more detailed description of each sector and the factors considered by the data provider is provided in appendix 1.

Potential investments are screened for compliance with the sustainability investment policy and the exclusion list prior to acquisition.

Sava Re monitors the investment portfolios of the Group companies at least quarterly and prepares a list of exclusions, which is also communicated to the risk and asset-liability management department, which is responsible for compliance reporting to the asset-liability management subcommittee. The findings are also communicated to the Group companies.

Investments and issuers found to be in breach of the above criteria are added to the list of investments and issuers in which no further investment is permitted (i.e. the exclusion list). If an issuer on the exclusion list issues a sustainability (ESG) bond, as defined in section 2 of this policy, this investment is not placed on the exclusion list. In this way, the Group supports the issuers' efforts towards more sustainable operations and restructuring.

Existing investments on the exclusion list may be held to maturity, but they may be sold early.

## 5 Compliance with legislation, global initiatives and principles promoting sustainability in the investment process

### 5.1 Legislation

The Group is required to ensure compliance with applicable legislation, including:

- Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (SFDR Regulation) and Delegated Regulation (EU) 2022/1288 (SFDR Delegated Regulation),
- Delegated Regulation (EU) 2021/1256 as regards the integration of sustainability risks in the governance of insurance and reinsurance undertakings,
- Regulation (EU) 2020/852 (EU Taxonomy Regulation) and its delegated regulations,
- Directive (EU) 2022/2464 (CSRD Directive) and Delegated Regulation (EU) 2023/2772 (ESRS Regulation), and
- other European and national legislation.

### 5.2 Global initiatives and associations

The Group supports the collective efforts of the global investment community to form common standards for integrating ESG considerations into investment decision-making.

To this end, the Group is a signatory to the international principles for responsible investment and also follows the OECD guidelines for multinational enterprises. It has also joined the UN Global Compact, which promotes responsible business practices in the areas of human rights, labour, environment and anti-corruption, and the PCAF. The Group has incorporated these incentives and principles into its investment process based on excluded industries and practices.

**UN Global Compact (UNGC):** This is a non-binding agreement that encourages companies to align their operations with universal principles in the areas of human rights, labour, environment and anti-corruption. It also encourages companies to follow the 17 UN sustainable development goals (SDGs). The agreement was signed in 2000 and has since become the standard for promoting sustainable business practices.

**OECD Guidelines for Multinational Enterprises:** These are recommendations from governments to multinational enterprises operating in or from adhering countries. In accordance with applicable laws and internationally recognised standards, they provide non-binding principles and standards for responsible business conduct at the global level. The guidelines are the only multilaterally agreed and comprehensive code of responsible business conduct, and governments are committed to promoting them. They include guidelines on human rights, employment, environmental management, anti-corruption, consumer protection, science and technology, competition and taxation. Each section sets out key principles and guidelines for companies to follow in their international operations to promote responsible, ethical and sustainable practices.

**UN Principles for Responsible Investment (UN PRI):** Through its six principles for responsible investment, the PRI encourages its signatories to incorporate environmental, social and governance aspects into their investment processes.

**Partnership for Carbon Accounting Financials (PCAF):** PCAF reporting covers the measurement and reporting of greenhouse gas emissions associated with credit and investment portfolios.

## **6 Consideration of principal adverse impacts of investment decisions on sustainability factors**

Consideration of the principal adverse impacts of investment decisions on sustainability factors refers to addressing, identifying and managing the negative impacts that investments may have on the environment, society and the economy. Sustainable investing requires these impacts to be clearly identified and taken into account so that they can contribute to long-term sustainable solutions.

The Group considers the principal adverse impacts of investment decisions on sustainability factors based on the investment exclusion list that forms part of this policy. Group companies that are required to report at the level of the individual entity under the SFDR Regulation prepare appropriate reports, disclosures or explanations by 30 June each year and publish them on their websites in a clearly visible and easily accessible place.

In accordance with the requirements of the SFDR Regulation, Group companies disclose the principal adverse impacts at both the entity and financial product level. Transparent reporting is an important part of the sustainable investment approach. This is reflected in appropriate pre-contractual disclosures, remuneration policies, website disclosures and periodic disclosures.

### **6.1 Methodology for identifying and prioritising principal adverse impacts**

As a result of the Group's primary objective – to meet its environmental goals and thereby mitigate climate change, the monitoring and improvement of the principal adverse impacts (PAI) indicators in the area of climate and other environmental factors is defined as a primary objective in the prioritisation of principal adverse impacts of investment decisions. In particular, the reduction of scope 1 and scope 2 greenhouse gas emissions, as measured by PAI indicator 1.1, and the reduction of the carbon footprint of investments, as measured by PAI indicator 1.2 (see table in appendix 4).

In addition to environmental goals, the Group also monitors social, governance and employee-related issues, which are reflected in the measurement of PAI indicator 1.10 (violations of UNGC principles and OECD guidelines for multinational enterprises). The creation of the exclusion list, which includes the criterion of monitoring violations of the UNGC principles and the OECD guidelines, has enabled us to monitor indicators related to social issues, respect for human rights and corporate governance.

The governance criterion promotes transparent and fair operations and does not allow, for example, embezzlement, corruption and bribery. Criteria such as the production, distribution and sale of tobacco products, gambling and the like reduce the adverse impacts on the population. By taking these into account, the Group monitors the social aspects of its investing activities.

The key approach to achieving the goals of classifying the principal adverse impacts of investment decisions is to exclude controversial activities and practices from the sustainable development perspective. In this way, the Group indirectly influences and mitigates the principal adverse impacts of investment decisions on environmental and social sustainability factors.



## 7 Active ownership

The Group acts as an active owner on its direct investments in Slovenia, where the Group has assessed it has a material impact. The Group's active ownership activities include monitoring investments, reviewing all agenda items of shareholder meetings, attending shareholder meetings and voting.

On the Group's non-Slovenian holdings, where its impact is low, the Group has so far decided to actively monitor its investments and issuers but not to attend shareholder meetings.

## 8 Data sources

The Group obtains data for sustainability purposes from the ESG data provider, MSCI Inc.

MSCI Inc. collects information directly from companies or assesses it if the company has not yet disclosed exact figures. The Group believes that MSCI Inc.'s data collection methodologies and index assessment processes are reliable, credible and accurate.

## 9 Reporting

Sava Re reports on the implementation of this policy at the Group level annually in the Group's annual report. The Group carries out periodic monitoring and reporting in accordance with sustainability regulations and legislation.

As the parent company, Sava Re checks and updates the compliance of the companies' investments on a quarterly basis and regularly informs the companies about the compliance or possible non-compliance with the exclusion list of investments in order to inform each company and take action if necessary. Compliance with the sustainability investment policy is also reported to the asset-liability management subcommittee at least quarterly.

## 10 Transitional and final provisions

This policy constitutes a reference document for implementing policy guidelines in the Group's subsidiaries.

Adjustments and deviations are documented and reported in accordance with the Corporate Governance Policy of the Sava Insurance Group. The area administrator informs the relevant business function holder of the parent company and the Group governance function of the implementation of individual policy guidelines in subsidiaries.

This policy becomes effective upon adoption by the management board and applies from 1 February 2025. Upon adoption of this policy, the Sustainability Investment Policy of the Sava Insurance Group, dated 31 January 2023, ceases to apply.

The administrator reviews this policy annually and, if necessary, proposes amendments to the Company's management board.

This document is to be posted on the Company's website ([www.sava-re.si](http://www.sava-re.si)) in both Slovenian and English.

Ljubljana, 28 January 2025

The Management Board of Sava Re d.d.

---

Marko Jazbec, Chairman

---

David Benedek, Member

---

Polona Pirš, Member

---

Peter Skvarča, Member

## 11 Appendices

### Appendix 1: Overview and description of excluded industries and practices

Industry	MSCI index header	MSCI index description (activities)	Criterion for exclusion
Adult entertainment – maximum percentage of revenue	AE_MAX_REV_PCT	The company's revenue (or, if not disclosed, the maximum estimated revenue) from the production, distribution or sale of adult products or services, expressed as a percentage of total revenue in the last full financial year. Expressed as a percentage where 1.0 is represented as 1%.	5% of the issuer's revenue
Tobacco total – maximum percentage of revenue	TOB_MAX_REV_PCT	The company's revenue (or, if not disclosed, the maximum estimated revenue) from the manufacture, distribution or sale of tobacco products as a tobacco brand licence holder or as a supplier of tobacco products, expressed as a percentage of total revenue in the last full financial year. Expressed as a percentage where 1.0 is represented as 1%. Tobacco products include nicotine-containing products, including traditional and alternative smoking tobacco products.	5% of the issuer's revenue
Gambling – maximum percentage of revenue	GAM_MAX_REV_PCT	The company's revenue (or, if not disclosed, the maximum estimated revenue) from gambling, including online or mobile gambling and supporting activities, expressed as a percentage of total revenue in the last full financial year. Expressed as a percentage where 1.0 is represented as 1%.	5% of the issuer's revenue
Controversial weapons – any tie	CWEAP_TIE	The index shows whether the company is involved in the production of complete weapon systems, delivery platforms or components for cluster munitions; the production of complete weapon systems or components for anti-personnel mines and biological or chemical weapons; the production of depleted uranium weapons, blinding laser weapons, incendiary weapons or weapons with non-detectable fragments; or is indirectly involved through ownership links with companies involved in such products. Nuclear weapons are not included in this overview. A value is "true" if one or more basic inclusion factors have a value of "true" (yes). If the result is "true", it means that more than 0% of the issuer's revenue comes from the controversial weapons industry.	0% of the issuer's revenue
Weapons – maximum percentage of revenue	WEAP_MAX_REV_PCT	The company's revenue (or, if not disclosed, the maximum estimated revenue) from the production of conventional weapons, components for such products, or support systems and services for such products; the production of biological or chemical weapons and components for such products; the production of nuclear weapons, exclusive and dual-purpose delivery platforms capable of delivering such products, intended and dual-purpose components for such products, and services provided for such products; and the production of blinding weapons, incendiary weapons, or weapons with non-detectable fragments in the last full financial year. Expressed as a percentage where 1.0 is represented as 1%.	5% of the issuer's revenue

Conventional oil and gas – maximum percentage of revenue	CONV_OIL_GAS_MAX_REV_PCT	The index defines the maximum percentage of revenue (either reported or estimated) above 0% that the company derives from conventional oil and gas production. It includes all types of conventional oil and gas production, including Arctic onshore/offshore, deep water, shallow water, and other onshore/offshore production. It does not cover revenue from unconventional oil and gas production (oil sands, shale oil and shale gas).	<b>10% of the issuer's revenue</b>
Thermal coal-based power generation – maximum percentage of revenue	GENERAT_MAX_REV_THERMAL_COAL	The index defines the maximum percentage of revenue (either reported or estimated) that the company derives from thermal coal-based power generation.	<b>10% of the issuer's revenue</b>
Thermal coal mining – maximum percentage of revenue	THERMAL_COAL_MAX_REV_PCT	The index defines the maximum percentage of revenue (either reported or estimated) above 0% that the company derives from the mining of thermal coal (including lignite, bituminous, anthracite and steam coal) and its sale to external parties. It does not cover revenue from metallurgical coal; coal mined for internal power generation (e.g. in the case of vertically integrated power producers); intra-company sales of mined thermal coal; and coal trading.	<b>10% of the issuer's revenue</b>
Shale gas – maximum percentage of revenue	SHALE_GAS_MAX_REV_PCT	The index defines the maximum percentage of revenue (either reported or estimated) above 0% that the company derives from shale gas production. It does not cover revenue from non-extraction activities (e.g. exploration, surveying, processing and refining); ownership of shale gas reserves with no associated extraction revenue; and revenue from intra-company sales.	<b>0% of the issuer's revenue</b>
Shale oil – maximum percentage of revenue	SHALE_OIL_MAX_REV_PCT	The index defines the maximum percentage of revenue (either reported or estimated) above 0% that the company derives from shale oil production. It does not cover revenue from non-extraction activities (e.g. exploration, surveying, processing and refining); ownership of shale gas reserves with no associated extraction revenue; and revenue from intra-company sales.	<b>0% of the issuer's revenue</b>
UN Global Compact alignment	UNGC_COMPLIANCE	The index assesses the company's alignment with the UNGC principles based on the MSCI ESG Research methodology. Possible scores are fail, watch list and pass.	<b>Fail</b>
OECD alignment	OECD_ALIGNMENT	The index assesses the company's alignment with the OECD guidelines for multinational enterprises based on the MSCI ESG Research methodology. Possible scores are fail, watch list and pass.	<b>Fail</b>

<b>ESG rating</b>	ESG_RATING	The ESG rating assesses the overall environmental, social and governance (ESG) performance of each issuing state. Countries with low-risk exposure and effective ESG governance score the highest (AAA), while countries with high-risk exposure and weak ESG governance score the lowest (CCC). The ratings are based on a scale of one to seven, with AAA being the best and CCC being the worst. According to the relevant criteria of this policy, all government bonds are eligible, except those rated B and/or CCC.	<b>Rating below BB</b>
-------------------	------------	--	------------------------

Source: MSCI Inc.

*Appendix 2: Thematic intersection between controversial activities under the OECD guidelines and the UNGC principles*

Scope	Thematic areas	OECD	UNGC
<b>Human rights</b>	Civil liberties	Yes	Yes
	Censorship and surveillance	Yes	Yes
	Controversial regions	Yes	Yes
	Controversial sourcing	Yes	Yes
	Indigenous peoples' rights	Yes	Yes
<b>Labour</b>	Child labour	Yes	Yes
	Forced/slave labour	Yes	Yes
	Kidnapping and attacks	Yes	No
	Working conditions/pay	Yes	No
	Discrimination and harassment	Yes	Yes
	Opposition to trade unions/unionisation	Yes	Yes
	Health and safety	Yes	No
<b>Environment</b>	Land use and logging	Yes	Yes
	Biodiversity and endangered species	Yes	Yes
	Marine biodiversity	Yes	Yes
	Electronic waste	Yes	Yes
	Packaging material and waste	Yes	Yes
	Energy and climate change	Yes	Yes
	Operational waste	Yes	Yes
	Pesticides / persistent organic pollutants	Yes	Yes
	Toxic releases to air/water/land	Yes	Yes
	Supply chain management	Yes	Yes
	Water stress	Yes	Yes
	Oil spill	Yes	Yes
	<b>Economic and business issues</b>	Bribery and corruption	Yes
Controversial investments		Yes	Yes

	Money laundering	Yes	No
	Import/export violations	Yes	No
<b>Customer issues</b>	Anti-competitive behaviour	Yes	No
	Predatory lending	Yes	No
	Fraud and billing	Yes	No
	Restricted access to products/services	Yes	No
	Misleading claims	Yes	No
	Pesticides, chemical safety	Yes	No
	Product and service safety/quality	Yes	No
	Structural integrity and materials	Yes	No
	Privacy and data security	Yes	No
<b>Community development</b>	Impact on communities	Yes	Yes

Source: MSCI Inc.

*Appendix 3: Description of the ESG rating methodology*

Pillar	Risk factor	Weight (%)	Risk exposure sub-factor	Weight (%)	Risk management sub-factor	Weight (%)
Environmental (E)	Natural resource risk	10%	Energy security	2%	Energy resource management	2%
			Productive land and mineral resources	2%	Resource conservation	2%
			Water resource exposure	2%	Water resource management	2%
			Biodiversity exposure	2%	Biodiversity management	2%
			Pollution and waste exposure	2%	Pollution and waste management	2%
	Climate change and natural hazards	15%	Physical risk exposure	7.50%	Physical risk management	7.50%
			Transition risk exposure	7.50%	Transition risk management	7.50%
Social (S)	Human capital risk	15%	Basic human capital	5%	Basic needs	5%
					Human capital infrastructure	3%
			Higher education and technological readiness	6%	Human capital performance	3%
			Knowledge capital	4%	Knowledge capital management	4%
	Economic environment risk	10%	Economic environment	10%	Wellness	10%
Governance (G)	Financial governance risk	20%	Financial capital and trade vulnerability	20%	Financial management	20%
	Political governance risk	30%	Institutions	10%	Stability and peace	10%
			Judicial and penal system	10%	Corruption control	10%
			Governance effectiveness	10%	Political rights and civil liberties	10%

Source: MSCI Inc.



*Appendix 4: Summary of principal adverse impacts*

Applies to	Scope	Adverse impact indicator	Table	No.	
Indicators applicable to investments in investee companies	Climate and other environment-related indicators	Greenhouse gas emissions	1	1	
		Carbon footprint	1	2	
		Greenhouse gas intensity of investee companies	1	3	
		Exposure to companies active in the fossil fuel sector	1	4	
		Share of non-renewable energy consumption and production	1	5	
		Energy consumption intensity per high impact climate sector	1	6	
		Activities negatively affecting biodiversity-sensitive areas	1	7	
		Emissions to water	1	8	
		Hazardous waste and radioactive waste ratio	1	9	
		Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters	Violations of UNGC principles and OECD guidelines for multinational enterprises	1	10
			Lack of processes and compliance mechanisms to monitor compliance with UNGC principles and OECD guidelines for multinational enterprises	1	11
			Unadjusted gender pay gap	1	12
			Board gender diversity	1	13
			Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	1	14
Additional indicators applicable to investments in investee companies	Climate and other environment-related indicators	Investments in companies without carbon emission reduction initiatives	2	4	

	Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters	Number of identified cases of severe human rights issues and incidents	3	14
Indicators applicable to investments in sovereigns and supranationals	Environmental indicators	Greenhouse gas intensity	1	15
	Social indicators	Investee countries subject to social violations	1	16

Source: SFDR Delegated Regulation.



**Sava Re d.d.**

Dunajska cesta 56, P.O.B. 318

SI-1001 Ljubljana, Slovenia

T +386 1 47 50 200

F +386 1 47 50 264

[info@sava-re.si](mailto:info@sava-re.si)

[www.sava-re.si](http://www.sava-re.si)