Principal Adverse Impact Statement (PAI)

June 2025

A. Summary

Aviva Life & Pensions Ireland DAC, (“Aviva Life & Pensions,“we” or “us”) Legal Entity Identifier 635400YD7OOB4VLZJC20, considers principal adverse impacts of its investment decisions on sustainability factors. The present statement is the consolidated statement on principal adverse impacts on sustainability factors for assets managed by Aviva Life & Pensions.

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

Note on coverage of this statement:

This statement covers circa 95% of Aviva Life & Pensions total assets (the “Covered Assets”). The Covered Assets include assets associated with the business in Ireland under the management of Aviva Life & Pensions Ireland DAC (ALPI DAC) and also the overseas life assurance business of Aviva Life & Pensions UK Limited which was transferred to ALPI DAC. The Covered Assets are managed on behalf of Aviva Life & Pensions by a selection of investment managers, (the “investment managers”). A schedule of these investment managers is provided at the end of this document.

The remainder of our assets are not included in the 2024 data.

Examples of these are:

- Cash, including Fixed Deposits and derivatives are not included in the assets which are considered under this statement because, by their nature, they do not have associated PAIs.
- Gold is held as an exchange traded commodity (ETC). The commodity (Gold) is tracked by the ETC and serves as collateral for a debt instrument and does not generate a PAI.
- Equities where the data available for a particular holding was insufficient in detail.

We consider the mandatory principal adverse impact indicators and two voluntary indicators defined by the EU Sustainable Finance Disclosure Regulation (“SFDR”), subject to data availability and quality. The Aviva Life & Pensions Sustainability Policy sets out our approach to corporate engagement via our appointed investment managers in relation to, proxy voting, exclusions, and stewardship.

B. Description of the principal adverse impacts on sustainability factors

Economic activities may cause or contribute to negative effects on sustainability factors. In the context of SFDR, the most significant negative effects on sustainability factors that are material or likely to be material are referred to as principal adverse impacts ("PAI"). We believe that companies and sovereigns conducting themselves in a responsible manner with good governance practices, high standards of integrity and a sustainable business model should be better positioned to deliver long-term risk adjusted returns to investors, while creating value for wider stakeholders and society. As such, adverse impacts on sustainability factors increase the risk to the long-term value (or volatility) of investments. Understanding the environmental, social and governance ("ESG") risks and opportunities, and the adverse sustainability impacts of our investments helps us to make better investment decisions, leading to better investment outcomes for our customers. Our ESG philosophy is to invest in the transition to a more sustainable future and, in particular, promote the relative merits of engagement over divestment. Our fund managers often choose to invest in "transitioning" companies (companies transitioning to reduced carbon intensity in their operations and products) and sovereigns that are demonstrating positive change or where they see potential to influence their transition through our stewardship and engagement activities. They, therefore, do not choose to systematically screen out investments that may have caused adverse sustainability impacts. They may, however, exclude certain sectors and activities that they believe have significant adverse impacts on sustainability factors and have no place in a sustainable future. Currently, fund manager exclusions may include companies deriving a prescribed proportion of their revenue from the manufacture & maintenance of controversial weapons, thermal coal, unconventional fossil fuels and both the manufacture & distribution of tobacco.

SFDR provides 14 mandatory PAI indicators and a smaller selection of mandatory indicators for government debt and real estate assets. These mandatory indicators range from carbon emissions, fossil fuel exposure, waste levels to gender diversity, due diligence on human rights and exposure to controversial weapons. In addition, SFDR also proposes a large number of "voluntary" environmental and social indicators from which asset managers must select two as a minimum. The SFDR PAI indicators and metrics are set out in Tables 1-3, including the voluntary SFDR indicators that Aviva Life & Pensions has selected, which are also described below.

The mandatory indicators under SFDR, in relation to the principal adverse impacts of our investment decisions on sustainability factors, are set out in Table 1 below. For each of these indicators we have outlined the actions taken thus far and our intended plans to avoid or reduce the principal adverse impacts identified. This information covers the reference period of 1 January to 31 December 2024.

Details on the impacts compared to the previous year are published in this report. A new report will be published at least annually.

Indicators applicable in investee companies

Adverse Sustainability Indicator	Metric	Metric	Impact (Year 2024)	Impact (Year 2023)	Impact (Year 2022)	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 tC02eq[1]	86,001.80	195,989.76	141,805.25	Sum of portfolio companies' Carbon Emissions - Scope 1 (tCO2e) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value	To date, our primary focus has been on increasing new investment flows and assets into SFDR Article 8 funds. In December 2024, over 90% of unit linked assets under management were in Article 8 funds. Improved impact scores in 2024 but one of our larger fund managers observed that coverage for the majority of GHG-related indicators has fallen by c. 10% since 2023. We will monitor this trend going forward. That said engagement activity has continued and fund managers have not supported management resolutions where they fall short of climate expectations.
		Scope 2 GHG Emissions tCO2eq1	20,493.90	48,194.22	35,286.31		
		Scope 3 GHG Emissions tCO2eq1	641,491.28	1,340,306.47	1,029,162.52		
		Scope 1+2+3 GHG Emissions tCO2eq1	742,950.17	1,583,564.28	1,206,254.08		
	2.Carbon Footprint tC02eq[1]	Carbon Footprint tCO2eq[1]/EURm	227.58	169.12	175.30	Sum of portfolio companies' Carbon Emissions - Scope 2 (tCO2e) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value Deeper coverage and larger AUM in 2024 report	
	3. Greenhouse Gas Intensity of	Greenhouse Gas Intensity of	674.89	666.44	774.83	The portfolio's weighted average of its holding issuers' GHG Intensity	

Adverse Sustainability Indicator	Metric	Metric	Impact (Year 2024)	Impact (Year 2023)	Impact (Year 2022)	Explanation	Actions taken and actions planned, and targets set for the next reference period
	Investee Company	Investee Company tCO2eq1/EURm				(Scope 1, Scope 2 and estimated Scope 3 GHG emissions/ EUR million revenue).Sustained effort by all managers to reduce this indicator	
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	6.9%	6.1%	4.7%	The percentage of the portfolio's market value exposed to issuers with fossil fuels related activities, including extraction, processing, storage and transportation of petroleum products, natural gas, and thermal and metallurgical coal.	
	5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and production	53%	64.1%	65.6%	The portfolio's weighted average of issuers' energy consumption and/or production from nonrenewable sources as a percentage of total energy used and/or generated. Despite increased coverage, average scores have improved	

	6. Energy consumption ntensity per high impact climate sector	NACE Code A (Agriculture, Forestry and Fishing) GWh/ EURm	Not reliable	0.12	0.09	The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within NACE Code A – NACE Code L). Many fams small and off grid and energy use is often indirect via fertilisers and machinery	
		NACE Code B (Mining and Quarrying) GWh/ EURm	1.30	1.30	1.06		
		NACE Code C (Manufacturing) GWh/EURm	0.28	0.41	0.50		
		NACE Code D (Electric, Gas, Steam, Electricity and Air Conditioning Supply GWh/ EURm	2.21	3.00	4.02		
		NACE Code E (Water Supply; Sewerage, Waste Management and Remediation Activities) GWh/ EURm	0.46	1.15	1.32	Much improved attention to waste management	

		NACE Code F (Construction) GWh/EURm	0.10	0.15	0.13		
		NACE Code G (Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles) GWh/EURm	0.35	0.18	0.53		
		NACE Code H (Transportation and Storage) GWh/EURm	1.40	2.11	1.59		
		NACE Code L (Real Estate Activities) GWh/ EURm	0.32	0.40	0.39		
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	5.95%	3.2%	0.48%	The percentage of the portfolio's market value exposed to issuers' that reported having operations in or near biodiversity sensitive areas and have been implicated in controversies with severe or very severe impacts on the environment.	One of our larger managers has developed analytics capabilities under the theme of nature risk solutions for the investment teams to build and monitor their funds under management. In terms of activities a number of management resolutions were not supported where they fell short of biodiversity expectations. We note that biodiversity related metrics are still not reported on widely and with high-quality data and this will be focussed on. Biodiversity and nature themes will continue to be considered in integration and stewardship activity over the next reference period. 2023 data has been restated and the calculation methodology has been change by a significant asset manager.

Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average (t/ EURm)	0.27%	0.65%	0.48%	The total annual wastewater discharged (metric tons reported) into surface waters as a result of industrial or manufacturing activities associated with 1 million EUR invested in the portfolio. Companies' water emissions are apportioned across all outstanding shares and bonds Poor coverage data from 2022 skews the 2022 base number	Water is currently not a material consideration for our investment funds.
Waste	9. Hazardous Waste Ratio	Tonnes of hazardous waste generated by investee companies per million EUR invested, expressed as a weighted average (t/ EURm)	0.72	0.86	0.69	The total annual hazardous waste (metric tons reported) associated with 1 million EUR invested in June 2025 7 expressed as a weighted average the portfolio. Companies' hazardous waste is apportioned across all outstanding shares and bonds based on the most recently available enterprise value	One of our larger managers has developed analytics capabilities under the theme of nature risk solutions for the investment teams to build and monitor their funds under management. In terms of activities a number of management resolutions were not supported where they fell short of biodiversity expectations. We note that biodiversity related metrics are still not reported on widely and with high-quality data and this will be focussed on. Biodiversity and nature themes will continue to be considered in integration and stewardship activity over the next reference period and the calcul;ation methodology has been change by a significant asset manager.
	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 Cooperation	Share of investments in investee companies that have been involved in violations of the UNGC principles		0.3%	1.1%	The percentage of the portfolio's market value exposed to issuers with very severe controversies related to the company's operations and/or products. Managers have continued to pay close attention to this area.	Our largest asset manager iis a signatory to the UNPRI, this demonstrates a strong commitment to responsible investment including adhering to restrictions set out in the UN Global Compact.

	and Development (OECD) Guidelines for Multi-National Enterprises	or OECD Guidelines for Multinational Enterprises	0.23%				We support adherence to international standards and norms. During 2024, our data provider changed the methodology for PAI 11, effectively amending what constitutes effective monitoring of compliance, which lowers the standard for companies. This has affected the 2024 values.
	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	18.1%	27.0%	8.6%	The percentage of the portfolio's market value exposed to issuers that do not provide evidence that they monitor their compliance with the UNGC. Very poor reporting coverage of this metric in 2022.	Our largest asset manager is a signatory to the UNPRI, this demonstrates a strong commitment to responsible investment including adhering to restrictions set out in the UN Global Compact.
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	12.3%	11.9%	14.3%	The portfolio holdings' weighted average of the difference between the average gross hourly earnings of male and female employees, as a percentage of male gross earnings.	Coverage for PAI 12 increased in 2024, which has affected the 2024 values. We consider fair remuneration including gender pay gap within our integration and stewardship activities where material differences are identified. We will continue to consider this theme in our

							integration and stewardship activity over the next reference period.
	13. Board gender diversity	Average ratio of female to male board members in investee companies	33.6%	35.9%	35.6%	The portfolio holdings' weighted average of the ratio of female to male board members.	We have noted that a number of our fund managers voted against some companies in 2024 due to insufficient gender diversity at board level, as well as senior management level. We will continue to consider this theme in our integration and stewardship activity over the next reference period.
	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	0.15%	0.05%	0.63%	The percentage of the portfolio's market value exposed to issuers with an industry tie to landmines, cluster munitions, chemical weapons or biological weapons.	A number of our fund managers, offering Article 8 funds, will automatically exclude companies involved in the production and sale of Controversial Weapons (nuclear, cluster, anti-personnel mines, laser-blinding weapons and biological weapons) are excluded from investment. This approach reduces our exposure to companies involved in the manufacture or selling of controversial weapons.
Indicators applicable to investments in sovereigns and supranationals							
	15. GHG intensity	GHG intensity of investee countries tCO2eq/EURm	201.34	165.53	180.38	The portfolio's weighted average of sovereign issuers' GHG Emissions Intensity (Scope 1, 2 and 3 emissions/EUR M GDP)	In 2024 our largest fund manager communicated with sovereigns (where we are materially invested) regarding their national climate plans, initially via tailored letters then through proactive outreach, collaborative initiatives and participation at events.

							We will continue to monitor this theme in our integration and stewardship activity over the next reference period.
	16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	3	1	3	The portfolio's number of unique sovereign issuers with European External Action Service (EEAS) restrictive measures (sanctions) on imports and exports	We follow specified sanctions of the EU and follow any associated mandatory investment restrictions to which the firm is subject. We verify that our managers have considered social factors in their sovereign ESG integration process. This can be achieved both quantitatively through our sovereign ESG score, as well as through qualitative analysis conducted by their investment and ESG teams. We will continue to consider this theme in our integration and stewardship activity over the next reference period
	16. Investee countries subject to social violations	Number of investee countries subject to social violations (relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and,	2.0%	1.0%	3.0%		as above

		where applicable, national law					
	Indicators applicable to investments in real estate assets						
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	0.87%	0.64%	0.00%	Due to limited availability of data some of the information related to investments in real estate assets is collected and reported on an annual basis. This is the best available at the time of publication of this document. We are working with our managers to address and enhance the current situation.	We do not hold any direct property that has an exposure to real estate assets involved in the extraction, storage, transport, or manufacture of fossil fuels.
Energy Efficiency	18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets	0.6%	1.10%	2.80%	Due to limited availability of data some of the information related to investments in real estate assets is collected and reported on an annual basis. This is the best available at the time of publication of this document. We are working with our managers to address and enhance the current situation.	This is a material consideration in our investment funds. Where within scope, our property managers are expected to continue improving energy ratings in buildings over time.

An indicator which is considered when investing in companies is where there are no expressed carbon emission reduction initiatives. Our approach to this indicator is to monitor the share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement. This indicator is part of the set of additional indicators that relate to climate and the environment, as defined in the SFDR (indicator 4).

Voluntary environmental PAIs		
Additional climate and other environment-related indicators		
Other indicators for principal adverse impacts on sustainability factors		
Adverse Sustainability Impact	Adverse sustainability impact (qualitative or quantitative)	Metric
Indicators applicable to investments in investee companies		
Climate and other environment-related indicators		
Emissions	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

We also consider an indicator that relates to lack of anti-corruption and anti-bribery policies. Our approach is that we monitor the share of investments in entities without policies on anti-corruption and anti-bribery consistent with the United Nations Convention against Corruption. This indicator is part of the set of additional indicators that relate to social and employee, respect for human rights, anti-corruption, and anti-bribery matters, as defined in the SFDR (indicator 15). We will consider these indicators subject to data availability and quality.

Voluntary social PAIs		
Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matter		
Additional indicators for social and employee, respect for human rights, anti-corruption, and anti-bribery matter		
Other indicators for principal adverse impacts on sustainability factors		
Adverse Sustainability Impact	Adverse sustainability impact (qualitative or quantitative)	Metric
Indicators for social and employee, respect for human rights, anti-corruption, and anti-bribery matters		
Anti-Corruption and Anti-Bribery	15. Lack of Anti-Corruption and Anti- Bribery policies	Share of investments in entities without policies on anti-corruption and anti-bribery consistent with the United Nations Convention against Corruption

C. Description of the policies to identify and prioritise principal adverse impacts on sustainability factors

Aviva Group comprises asset owners, including insurance companies, and an inhouse asset manager, Aviva Investors, acting as long-term stewards of customers', clients', and shareholder assets. Climate-related considerations are integrated into investment decision making, products, and services we offer, asset manager mandates, and asset manager oversight. We seek to increase the alignment of our investment portfolios to the goals of the Paris Agreement and in line with Aviva's climate, nature, and social action ambitions.

Sustainability and environment, social, and governance issues ("ESG") are a core pillar of Aviva Life & Pensions strategy and business plan. Climate change is widely recognised as a critical systemic risk experienced globally. Aviva plc, including Aviva Life and pensions, recognise the role we have to play in the global response, whilst helping to secure the futures of our customers, shareholders, and our wider stakeholder community. As a leading Irish insurer, Aviva Life & Pensions has a responsibility to ensure that how it does business has little, if any, adverse impact on the environment. Our Sustainability Policy sets out our approach to sustainability integration in the investment process and is available at: 1.604.03.21-Our-Sustainability-Policy.pdf (avivabroker.ie).

We recognise the investment managers we have appointed may have their own proprietary policies and procedures in place to manage PAIs within their own investment decision making process, for assets they manage on our behalf. We trust our delegated investment managers to have extensive knowledge of both the governance and the operations of the underlying investee companies, sovereign and supranational or real estate assets which they invest in. We are aware that these delegated investment managers will identify and prioritise principal adverse impacts on sustainability, based on their own policies and procedures and we carry out semi-annual due diligence on our investment managers. We reserve our right to review the voting record of any investment manager is in line with their stated voting policy, while simultaneously recognising that the investment managers we appoint often have extensive knowledge of business and governance practices within companies they invest in which is how they make decisions to vote based on their own proxy voting execution policy. If we think practices can be improved, we will discuss with our investment managers.

Governance

This Principal Adverse Impact Statement on sustainability factors was included as part of our Customer Investment Committee meeting on 26 June 2025. We review the statement on an ongoing basis and proposed changes by relevant teams are reviewed and approved by senior management.

The responsibility for the implementation of our approach to integrating the principal adverse impacts on sustainability is reviewed and approved by senior management. The approach to PAIs is allocated as follows:

- **Ireland Sustainability Council:** The Council includes senior leadership across Aviva Life & Pensions and provides stewardship and strategic oversight of the company's sustainability ambitions which includes its Responsible Investment Strategy.
- **Aviva Life & Pensions' Customer Investment Committee:** This committee is responsible for overseeing and monitoring the investment management activity undertaken on our behalf of by our investment managers.
- **Investment Managers:** These managers are responsible for managing assets on behalf of Aviva Life & Pensions and in accordance with the Sustainability Policy of Aviva Life & Pensions performs semi-annual due diligence on each investment manager.

Methodologies used

i) To select the additional indicators:

Where we decide to voluntarily report against a principal adverse impact (under section B above), we select indicators based on their probability of occurrence and the potential severity of those principal adverse impacts. We make our decision as to which additional indicators we will focus on, based on a number of factors, including the data available and the extent to which the data available is reliable.

ii) To identify and assess the principal adverse impacts:

In addition, Aviva Group has partnered with MSCI, one of the world's largest research and data providers and work with other third-party data providers to analyse the PAIs of our investment portfolio. PAI data and corporate reporting has continued to evolve, however information is not always available and/or may contain inaccuracies and may be subject to restating in future statements. This is particularly the case in the following circumstances:

- Data obtained from companies in jurisdictions where disclosure requirements to report are not as developed and/or where there is a lower level or quality of disclosure or data may not be available. In such circumstances estimation models may be used by data providers which may result in inaccuracies or data having to be amended over time as more detailed information is made available.
- From external managers where a standardised data provision approach is not well established currently.

Margin of error with our methodologies

The methods we use to identify principal adverse impacts is subject to the data available to us and the quality of this data. We may ask our investment managers for additional data, to supplement the information. Where we use additional data, this data will be based on the methodology of the relevant investment manager. If data we report on is not available or it not sufficient quality, we can also use proxy data provided by third-party data providers.

Data sources

As part of our ongoing commitment to transparency and reporting, our investment managers aim to:

- co-operate with third party data providers to expand their existing datasets and product ranges.
- collaborate with international initiatives that are working to improve the availability and quality of relevant company disclosures.
- explore new mechanisms and third-party aggregation solutions for sourcing ESG data from third party managers in which we invest.

All information contained in this PAI Statement (including the PAI impact percentages) are, to the best of our knowledge and belief, true and accurate at the time of publication. Aviva Life & Pensions has relied solely on data obtained from third party data providers ("Third Party Data") to calculate the PAI impact percentages. Aviva Life & Pensions shall not be responsible or liable for any errors, inaccuracies, or inconsistencies in the PAI impact percentages which arise as a result of our reliance on such Third-Party Data.

Coverage and calculation methodology

Under the Sustainable Finance Disclosure Regulation (SFDR) those financial products that do not promote environmental or social characteristics and do not have sustainable investment as an objective fall into a category are known as Article 6. Article 6 funds do not have PAI factors that can be considered and therefore are also excluded from this Statement. In our calculations of coverage, we also exclude assets invested in gold, cash, deposits or other non-eligible assets such as businesses that are not part of our customers' investment portfolio. In aggregate c. 29% of the assets under management are excluded from the Principal Adverse Impact calculation.

In arriving at our PAI calculation for Aviva Life and Pensions Ireland DAC each fund is apportioned a weighting relative to the total assets held for our customers. We aggregate the weighted scores to arrive at an overall indicator score. The coverage ratio therefore is the proportion of funds where PAI data is provided as a proportion of funds which have not been excluded as referred to in the paragraph above.

D. Engagement policies

We consider active ownership and macro stewardship as the use of rights and positions of shareholders in investee companies to influence the activities or behaviours of such companies, through engagement and voting activities.

We describe below how we use our stewardship and engagement activity to support the transition to a more sustainable economy and the mitigation of adverse impacts.

Active Ownership:

Through our close relationship with our investment managers we are committed to being long-term responsible stewards of our clients' assets. Our investment managers are expected to actively exercise their rights as shareholders and utilise their voting power to promote responsible and sustainable practices in companies in which we invest, including ensuring that companies manage and mitigate adverse sustainability impacts. Our investment managers are also expected to engage with issuers, borrowers, sovereigns, and counterparties to encourage the adoption of progressive ESG practices over time.

One of the key tools through which we seek to understand and, where relevant, mitigate sustainability risks and the principal adverse impacts that a company has on sustainability factors is through our stewardship and the engagement activities of our appointed fund managers. We promote sustainable business practices, encouraging companies towards greater transparency, improved corporate governance and more sustainable behaviours which reduces adverse sustainability impacts. This together with our conviction-led and long-term focus helps to reduce risk and can enhance the long-term value of portfolios and our customers' investments.

We challenge our appointed investment managers to continue to identify adverse impacts on sustainability factors and to drive positive change through analysis, engagement and voting decisions. The results of our ongoing Investment Managers' engagement activities are used to inform their investment process and facilitate the integration of long-term sustainability factors into their investment decisions.

We expect our managers to request companies or countries they engage with to take action to mitigate PAI risks. This is then monitored and if insufficient progress is made they may escalate, or divest as a last resort

Macro Stewardship

As responsible investors, we take our duty to act in the best interests of clients and the integrity of the market seriously. We work with our investment managers to identify potential market-wide and systemic risks and seek to mitigate these risks through engagement.

We believe that where Principle Adverse Impacts are not, or not yet, financially material, this can be an indicator that there is a misalignment between short-term incentives and long-term financial and sustainability interests. In other words, the presence of market failure. In such instances, there can be limits to what our fund managers can achieve by engaging as active owners with issuers or companies on PAIs, as acting on their asks where the market is incentivising poor practices of investee companies while failing to reward sustainable ones will hit their bottom line and therefore be a competitive disadvantage.

The only way to correct such market failures is through policy action. But even though market participants are dependent on policymakers and regulators to make these changes, that does not absolve them of the responsibility to highlight issues where they arise and collaboratively engage with policymakers and regulators to promote well-informed and effective policy corrections. For example in addition to the micro stewardship engagement activity through our largest investment manager, Aviva Investors on our assets, part of the way we aim to mitigate PAIs is via the Aviva Investors' macro stewardship programme, whereby we take action to accelerate systemic change with the intention of correcting market failures and mitigating systemic sustainability risks.

E. References to international standards

Alignment with the Paris Agreement (links to PAI 1-6)

Aviva supports the ambition and objectives of the Paris Agreement. Aviva invests across the economy and our investment decision-making prioritises investment outcomes for customers and shareholders. Where possible, we aim to simultaneously decarbonise our portfolios and increase portfolio alignment to the goals of the Paris Agreement. Aviva plc are are signatories to the United Nations Principles for Responsible Investment as part of Aviva commitment to responsible investing.

For over 240 years in Ireland, Aviva Ireland has played a part in the lives of our customers, forming long-standing connections with communities. Aviva Life & Pensions is committed to playing its role in supporting a just transition focused on three core areas:

1. Acting on climate change,
2. Tackling social action, and
3. Embedding sustainability across our businesses.

Aviva's ambition (including Aviva Life and pensions) remains to be a Net Zero company by 2040. Aviva have set near-term science-based ambitions for 2030 and are making good progress against them. Our ambition covers all parts of Aviva's business including investments (Scope 3 category 15), insurance underwriting (Scope 3 category 15), insurance claims supply chain (Scope 3 category 11), and Aviva's operations and supply chain.

To track progress in aligning investments with our 2040 ambition, we have set interim ambitions. Our 2025 ambition focused on reducing Scope 1 and Scope 2 carbon intensity by revenue of listed equities and corporate bonds in our shareholder and with-profit funds by 25% (compared to a 2019 baseline), and at year end 2024 Aviva achieved a 64% reduction. Our 2030 ambition is to reduce the Scope 1 and Scope 2 economic carbon intensity for listed equities, corporate bonds and loans, infrastructure and real estate assets held in shareholder, with-profits, and policyholder funds (where we have decision-making control and data) by 60%. This is measured at an Aviva plc level and includes all businesses including Aviva Life and Pensions Ireland. Compared to a 2019 baseline we are making good progress.

OECD Guidelines for Multinational Enterprises, UN Global Compact, and UN Guiding Principles on Business and Human Rights (links to PAI 10 and 11)

Companies eligible for investment are expected to operate within internationally accepted norms and standards related to human rights, labour rights, the environment, and business ethics.

For our Article 8 products, we require our investment managers to adhere to and to consider other organisations' output when assessing investments, as well as collaborations we participate in, statements we have signed and other related standards.

We will consider the above indicators when engaging with our third-party investment managers, subject to data availability and quality.

We incorporate the following international standards into our due diligence and reporting:

- The Paris Agreement
- UN Sustainable Development Goals
- EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks
- Compliance with the EU Taxonomy Regulation

Interpretation of the adherence to global norms and standards can be subjective. Where available, we will utilise third party data sets to assess adherence to these standards and norms alongside any qualitative judgements.

Engagement with Multilateral organisations

Aviva plc participate across various multilateral parties to encourage global ambition and congruence on climate and nature goals. For several years, Aviva has attended the UNFCCC COPs and since 2022, we have attended the United Nations Convention on Biological Diversity (UN CBD) COPs. We engage with key policymakers and negotiators, advocating for ambitious commitments and actions from Parties as well as meaningful financial system reform to support the delivery of the goals of the Paris Agreement and Kunming-Montreal GBF.

Engagement with industry participants

Many of the macroeconomic and industry-specific dependencies to our plan rely on engagement with industry bodies and trade associations to influence the climate and nature policy debate and agree on collective goals and policy positions. Aviva have a multifaceted engagement strategy that is based on our ability to influence outcomes and we apply a decision framework to determine participation in these industry bodies and associations. The framework assesses the extent to which the initiative aligns with and supports Aviva's strategic and advocacy goals, the commitments, and actions involved, as well as the potential risks and opportunities associated with our involvement. Internally, we collaborate closely across these initiatives and organisations through our Sustainability Advocacy Forum which Aviva Life and Pensions is represented on

Industry bodies

Aviva and Aviva Life and Pension prioritise our engagement with industry bodies based on their influence and ability to shape the market and policy environment and our role and influence within the organisations. The following industry bodies represent our key focus for engagement, and we are active in a wide range of alliances including;

- Insurance Ireland
- Central Bank of Ireland Climate Forum
- IBEC
- Net Zero Asset Managers Initiative
- Net Zero Asset Owners Alliance
- Principles for Responsible Investment
- Finance for Biodiversity
- PCAF
- GFANZ

F. Historical comparison

Aviva Life and Pensions' 2024 statement on sustainability factors for its managed assets has been updated with higher-quality data and broader coverage from its fund managers. Changes observed in 2024 compared to 2023 and 2022 are the results primarily from market movements or in some cases a change in the methodology from our managers.

Schedule of Investment Managers

- **Aviva Investors** Luxembourg S.A. Legal Entity Identifier 549300JYCIQECRTGQR50

- **Legal and General Investment Management (LGIM) –** LGIM Managers (Europe) Limited Legal Entity Identifier 2138007FJWCCJQ6KZM89

- **Cantor Fitzgerald Asset Management Europe –** Cantor Fitzgerald Ireland Limited Legal Entity Identifier 635400N5XVNTLTWTUK34

- **Columbia Threadneedle Investments** – Columbia Threadneedle Management Limited Legal Entity Identifier 213800QTJCQIMJF3IA71

- **DWS Group** – DWS Investment S.A. Legal Entity Identifier 549300L70BS183Y6ML67

- **Greenman Investments S.C.A. -** Greenman Investments Legal Entity Identifier 529900O5525PWVXSBB79

Assets transferred from Aviva Life and Pensions UK Limited and associated with the overseas life assurance business of Aviva Life & Pensions UK Limited which was transferred to Aviva Life & Pensions Ireland DAC

Investment Manager	**Legal Entity Identifier**
Ninety One Fund Managers UK Limited	213800247F9DRTHRPW30
East Capital Asset Management S.A. (Lux)	21380076GF79IHJFGS03
J.P. Morgan Asset Management (UK) Limited	2138009JJ8B595FIUW06
Columbia Threadneedle (UK) ICVC I - CT North American Equity Fund	213800AINXX1U8OGN680
Columbia Threadneedle (UK) ICVC V - CT Responsible Global Equity Fund	213800EJAXXBW8U5XN21
Columbia Threadneedle (UK) ICVC III - CT Global Total Return Bond (GBP Hedged) Fund	213800G9ESA6LDLILU70
abrdn Investments Luxembourg S.A.	213800K3MRPGMKRTEB15
M&G Luxembourg S.A.	213800KHFEP1L58PDC25
Baring International Fund Managers (Ireland) Limited	213800MW2KGI7H31B177
Aviva Investors Funds ACS - AI Money Market VNAV Pension	213800RPL1QJU8TWJN11
MSIM Fund Management (Ireland) Limited – Luxembourg Branch	2549008AR6Q1ABVUR442
Ampega Investment GmbH, Germany	5299004LHMISF547CM64
HAUCK & AUFHÄUSER FUND SERVICES S.A., Lux	529900C55XPLX8BWM794
ETHENEA Independent Investors S.A. (Lux)	529900E235XZSGWI7P27
BlackRock Global Funds – US Flexible Equity Fund, Lux	5493000VBLDY9YB8P237
FIL Investment Management (Luxembourg) S.A. (Lux)	54930020FVXYT8E0QU87
BLACKROCK GLOBAL FUNDS – WORLD MINING FUND (Lux)	5493003C0BXUIHPFTC89
PIMCO Global Advisors (Ireland) Limited	5493007MFJFFGMDVIF48
BlackRock Global Funds – Sustainable Energy Fund, Lux	5493009Z1H3ONBJRQQ80
Columbia Threadneedle (Lux) III	549300CN40D22L8BMK21
NORDEA INVESTMENT FUNDS S.A.	549300LCQUXMRSWPKT48
Life Funds EMEA AB	549300P05UD7GH3OY049
Vanguard Group (Ireland) Limited	549300PF53NS4QZ3OH06
Franklin Templeton International Services S.à r.l.	549300PVL6CYCWSH9C53
MSIM Fund Management (Ireland) Limited	549300QDS5K6OGU25W78
J. Safra Sarasin Fund Management (Luxembourg) S.A.	549300QVJTYK6E1EIO26
Aviva Investors UK Property Feeder Trust - Aviva Investors UK Property Feeder Acc Fund	549300RCOHCZC0YLSL21
Invesco Management S.A.	549300VDSJEXPNC5A615
BlackRock Global Funds - World Gold Fund	549300VJ8R1OCCCRJB59
Lannebo Kapitalförvaltning AB	549300VKZ5UYSWL0KI68
JPMorgan Asset Management (Europe) S.à r.l.	549300XWGTGPPNVKZY94
BNY Mellon Global Funds, plc - BNY Mellon Global Bond Fund	5N2ES2M2WGR2TO0Q5G40

Schroder Investment Management (Europe) S.A.	8AFAYMK90I2QVGLMLS34
Carmignac Patrimoine (Fra)	96950039YSR2SSH77885
S.A. COMGEST	9695009FD7COWRM2FU86
Amundi Asset Management (Fra)	DQ2T0MMUTO0IPF9G9Z35
Carmignac Investissement (Fra)	X0V79C0OOSCP8T3CJZ56