

Sustainable Finance Disclosure Regulation (SFDR)

On the 10 March 2021, the Sustainable Finance Disclosure Regulation (SFDR) came into effect within the European Union (EU). The SFDR introduces various sustainability-related disclosure requirements at an entity level and a product level to provide more transparency on sustainability. As MAPFRE MSV Life plc (MAPFRE MSV) is Financial Market Participant (FMP) domiciled within the EU, its investments will be subject to the SFDR.

Integration of Sustainability Risks in investment decisions

MAPFRE MSV is committed to stable and resilient social, environmental and economic outcomes and believe that sustainable investments are central to successful long-term investor outcomes.

MAPFRE MSV's investments are generally performed via external, independent and duly qualified investment managers who are authorized to manage the respective mandates on a discretionary basis within the applicable investment policies. Where relevant, MAPFRE MSV expects its active managers to fully integrate sustainability approach into their processes.

In its due diligence process of selecting and monitoring its investment managers MAPFRE MSV engages independent consultants for provision of sustainability metrics and ratings where possible. These sustainability evaluations are amongst the considerations when selecting and engaging a manager and on-going monitoring of the engaged managers. In addition to considering independent opinions of its consultants MAPFRE MSV also requires its managers to demonstrate directly to MAPFRE MSV their sustainability policies, their adoption and implementation in their investment decision making and investment processes where applicable.

No consideration of Adverse impacts on Sustainability factors

MAPFRE MSV Life p.l.c (MMSV) does not consider Principal Adverse Impacts (PAIs) of its investment decisions on sustainability factors, at the time of publication of this statement, as referred to in Article 4(1) of SFDR. MMSV is committed to integrating sustainability risks and factors into its investment decisions and whilst some of its investment managers already consider adverse impacts, MMSV believes that considering its current investment strategy and processes, it would be challenging to comply with the PAI regime under the SFDR for all its investment portfolios at this stage. Furthermore, MMSV believes that the data currently available does not allow for a proper consideration of PAIs and therefore such considerations could be challenging. Therefore, with a view to provide a true and fair representation of the Company's position in this regard, MMSV is not considering PAIs until further consolidation of data is achieved. Notwithstanding, MMSV remains committed to consider adverse impacts in the coming years as the data and information available on investee companies is further consolidated. MMSV is regularly reviewing its approach in this regard and will update its position accordingly.

Statement on the Remuneration Policy in terms of Article 5 of SFDR:

MAPFRE MSV Life plc, through its Remuneration Policy seeks to align its Remuneration Framework to its Sustainability goals. In this respect, the Remuneration Policy is also aligned with the MAPFRE Group Strategy which considers sustainability risks within its overall Risk Management practices.