Helvetia Group

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Statement on principal adverse impacts of investment decisions on sustainability factors.

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Contents.

1. Summary.

Helvetia Holding AG (Legal Entity Identifier: 5299007FNTNU3NBQPQ17) considers principal adverse impacts of its investment decisions on sustainability factors as part of its investment due diligence process and procedures. The statement on principal adverse impacts of investment decisions on sustainability factors, pursuant to Art. 4 (3) of Regulation (EU) 2019/2088, considers the reference period of 1. January 2023 to 31. December 2023 and covers investments of all subsidiaries included in the scope of consolidation of Helvetia Holding AG (as described in Annual Report, p.179–181).
The statement summarizes Helvetia's due diligence policies for identifying and prioritizing adverse sustainability impacts and indicators, a description of the adverse sustainability impacts identified and of the actions taken to reduce these impacts and the internationally recognized due diligence and reporting standards applied by Helvetia Group. Helvetia considers such principal adverse impacts of its investment decisions through screening and exclusion criteria, as well as increasing integration of sustainability considerations in investment processes.

The process of identifying and prioritizing adverse sustainability impacts and indicators is embedded within Helvetia's Sustainability Strategy 20.25. As part of our Sustainability Strategy, we want to contribute to the fight against climate change by avoiding, minimizing or at least reducing our potential adverse sustainability impact. Our Sustainability Strategy is structured into four sustainability pillars, and we coordinate the implementation of the Sustainability Strategy within these priority areas:

a) Sustainable products and customer relationships
b) Responsible investment
c) Sustainable business operations
d) Sustainability culture and governance

As part of its sustainability strategy 20.25, Helvetia has developed a comprehensive, Group-wide climate strategy. This forms the framework for assessing the actual and potential future impact of climate-related risks and opportunities on the strategy, business, and financial planning. Our climate strategy defines net-zero targets based on the Paris Climate Conference agreement and specifies measures to achieve these targets. We distinguish between targets for our own business operations and targets for indirect emissions from the investment and insurance business.

Helvetia aims to reduce its $CO2$ emissions from its own business operations to net zero emissions by 2040, while the aim is to achieve net zero emissions in the investment and insurance business by 2050. As a step towards net zero, Helvetia developed a Fossil Fuel Policy for the investment and insurance business in the reporting year. For the investment business, the Fossil Fuel Policy defines the exclusion of counterparties that generate at least 20 % of their revenue from coal or the unconventional extraction of oil and gas or expand their operations in the areas of coal or oil and gas. A complete phase-out of coal and unconventional oil and gas is planned by 2040.

Further information on the climate strategy and fossil fuel policy can be found in the Sustainability Report section of the Annual Report from page 22 onwards.

2. Description of the principal adverse impacts of investment decisions on sustainability factors.

Table 1 below outlines the mandatory indicators that the SFDR has defined. For each of these indicators, we have provided details of the measures we have already taken, as well as our plans for future actions and the targets we have set to prevent or minimize any adverse impacts. For the period from 1 January 2022 to 31 December 2022, Helvetia published the impact of investment decisions on sustainability factors for the first time. Helvetia is now also publishing the effects compared to the previous year in this PAI statement for the period from 1 January 2023 to 31 December 2023. To be consistent with the units defined by the template for this statement, all currency figures are calculated in EUR.

Table 1: Description of the principal adverse impacts on sustainability factors

Indicators applicable to investments in investee companies

Climate and other environment-related indicators

Adverse Sustainability Indicators		Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned, and targets set for the next reference period
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions, in metric tons	2'758'904	872’632	Reported or estimated (MSCI ESG methodology) scope 1 GHG emissions. The GHG emissions reported for the 2022 financial year were calculated on the basis of MSCI ESG data without applying the PCAF standard. With the introduction of GHG accounting in the reference period, GHG emissions were calculated in accordance with the international PCAF standards for the first time. This significantly increased the coverage of the portfolio, from around 50% of corporate bonds and equities to almost 100%. This also leads to higher calculated emissions. Due to the change in the calculation methodology, no direct comparison can be made.	Helvetia publicly committed to supporting the goal of net zero greenhouse gas emissions for its investment portfolio by 2050, in line with global efforts to limit warming to 1.5°C. Helvetia calculates the emissions for listed and unlisted shares, corporate bonds and loans, real estate, mortgages and government bonds annually as part of the greenhouse gas accounting in accordance with the international PCAF standard. In the next reference period, a climate strategy will be developed that contains targets and next steps for reducing greenhouse gas emissions.
		Scope 2 GHG emissions, in metric tons	213'971	175’027		
		Scope 3 GHG emissions, in metric tons	4'777'565	6’130’393		

	Total GHG emissions, in metric tons	7'750'439	7’178’052	Sum of scope 1, 2 and 3 emissions. The deviation results from the adjustment of the calculation method described under point 1.	
2. Carbon footprint	Carbon footprint, in metric tons per M EUR invested	341.60	430.03	Total greenhouse gas emissions per million EUR invested. Unlike the absolute emissions, the carbon footprint has decreased compared to the previous year. As we were able to include a larger proportion of the portfolio in the calculation of emissions by applying greenhouse gas accounting, not only the total emissions increase, but also the value of the investments to which the calculation relates.	
3. GHG intensity of investee companies	GHG intensity of investee companies, in metric tons per M EUR sales	1'029.17	909.07	Total GHG emissions intensity.	
4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	0.64%	0.59%	Share of investments in companies with exposure to fossil fuels related activities, including extraction, processing, storage and transportation of petroleum products, natural gas, and thermal and metallurgical coal.	As part of net-zero path of Helvetia’s investment portfolio, Helvetia has, as a first step, defined revenue-based exclusions for companies involved in thermal coal and oil sands. This approach aims to phase out fossil fuels and energy generation from fossil fuels from our investment portfolio.
5. Share of non- renewable energy consumption and production	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	67.42%	69.44%	Market-value-weighted average of investee companies’ energy consumption and/or production from non-renewable sources as a percentage of total energy use and/or generation.	
6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector			Market-value-weighted average of energy consumption intensity of investee companies per high climate impact NACE sector.	When defining the climate strategy for the next period, the companies with the highest emissions are analysed and targets and action points are defined.
	Sector A – Agriculture, Forestry and Fishing	0.9	1.24		
	Sector B – Mining and Quarrying	1.69	2.01		

		Sector C – Manufacturing	0.55	0.66		
		Sector D – Electricity, Gas, Steam and Air Conditioning Supply	4.38	5.06		
		Sector E – Water Supply, Sewerage, Waste Management and Remediation Activities	2.10	2.07		
		Sector F - Construction	0.34	0.31		
		Sector G – Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles	0.19	0.09		
		Sector H – Transportation and Storage	1.67	1.47		
		Sector L – Real Estate Activities	0.62	0.70		
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	2.31%	1.63%	Share of investments in companies with operations located in biodiversity sensitive areas and involvement in controversies with severe impact on the environment and/or operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas.	No measures to protect biodiversity have been implemented to date or are planned in the near future.
Water	8. Emissions to water	Tons of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0.25	0.0000031	The calculation of this key figure could be adjusted to better reflect the weighted average. Due to this adjustment, the value increased compared to the last reporting period.	No measures to reduce emissions to water have been implemented to date or are planned in the near future.
Waste	9. Hazardous waste and radioactive waste ratio	Tons of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	4.06	0.0000019	The calculation of this key figure could be adjusted to better reflect the weighted average. Due to this adjustment, the value increased compared to the last reporting period.	No measures relating to hazardous waste have been implemented to date or are planned in the near future.

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 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	0.23%	0.27%		We adhere to the UN Global Compact principles, and we aim to invest only in investee companies that comply with these norms. Therefore, we defined conditional exclusions for counterparties violating the UN Global Compact. Our Responsible Investment team periodically performs desktop analysis of actual and potential investee companies, based on MSCI ESG research and other publicly available information. If for an actual or potential investee company a material risk of an adverse impact is identified and this risk cannot be sufficiently mitigated, this will generally lead to terminating the exposure. In the next reporting period, an Active Ownership approach will be built up to work alongside the exclusions and give us more opportunities to deal with these risks and promote best practices in investee companies.
	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	29.54%	29.99%	Share of investments in investee companies where no evidence of processes around the compliance with UNGC principles or OECD Guidelines could be found.	We currently do not take into account processes and compliance mechanisms for monitoring compliance with the UNGC principles and the OECD Guidelines for Multinational Enterprises of the companies in which we invest.
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	12.76%	12.76%	Market-value-weighted average of unadjusted gender pay gap of investee companies.	We currently do not take into account the unadjusted gender pay gap of the companies in which we invest.
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	30.96%	30.96%	Market-value-weighted average of female board members as percentage of all board members of investee companies.	We do not currently take gender diversity into account in the management and supervisory bodies of the companies in which we invest.

	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	0.004%	0.004%	Exposure to companies involved in the manufacture or sale of controversial weapons is only possible via indirect investments due to the implemented exclusion and remains at the very low level of the previous year.	Counterparties involved in anti-personnel mines, cluster munitions, chemical weapons, and biological weapons are excluded from the investable universe for direct investments. The investment portfolio is regularly monitored to there is no exposure through direct investments.

Indicators applicable to investments in sovereigns and supranationals

Environmental	15. GHG intensity	GHG intensity of investee countries, in tons per M EUR GDP	220.08	229.76	Tons of CO_2e emissions per EUR million GDP of the country. National territorial emissions are sourced from EDGAR. Nominal GDP level is sourced from WDI. Currency conversion of Nominal GDP to euros uses the average annual nominal exchange rate level.	Helvetia also measures the emissions of government bonds as part of its greenhouse gas accounting. In the next reference period, a climate strategy is to be defined where targets and next steps to reduce GHG emissions are identified.
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			Due to the form of the available data, we decided to split the absolute and the relative factor by direct investments and indirect investments in third-party funds. For third-party funds no information is available on which countries are responsible for the absolute or relative exposure of the fund to investee countries with social violations. Therefore, for funds, we disclose the maximum absolute number of countries in one fund with social violations as well as the average relative exposure.	Regarding international sanctions, Helvetia abstains from investments and business relations related to a specific set of countries for which comprehensive human rights motivated economic sanctions provisions prevail (imposed by the UNSC). Helvetia regularly monitors the investment portfolio to ensure there is no unconscious exposure to such companies. In the future Helvetia will also perform pre- and post-trade checks for all listed securities, issuers, and further counterparties.
		Absolute number in direct investments	0	0		
		Relative number in direct investments	0.00%	0.00%		
		Maximum absolute number in third-party funds	8	7		
		Average relative number in funds	0.90%	0.93%		

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	NA	NA	No consistent data available on group level. For data on market unit level, please refer to the respective reports.	Helvetia does not invest in real estate related to the extraction, storage, transport or production of fossil fuels and this strategy will be pursued further.
Energy efficiency	18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets	NA	NA	No consistent data available on group level. For data on market unit level, please refer to the respective reports.	For property investment, Helvetia assesses adverse impacts of fossil fuel consumption through real estate assets, the exposure to energy-inefficient real estate assets, greenhouse gas emissions and energy consumption intensity. There is a focus on energy-efficient investments in future investment decisions.

Other indicators for principal adverse impacts on sustainability factors

In addition to the mandatory indicators, we selected additional indicators subject to our materiality analysis as well as data availability and quality. As shown in Table 2, we chose one additional climate and other environment-related indicator applicable to investments in investee companies, as well as 5 additional indicators for social and employee, respect for human rights, anti-corruption, and anti-bribery matters, shown in Table 3.

Table 2: Additional climate and other environment-related indicators

Climate and other environment-related indicators

Indicators applicable to investments in investee companies

Adverse Sustainability Indicators		Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned, and targets set for the next reference period
Emissions	4. Investments in companies without carbon emissions reduction initiatives	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	22.23%	26.53%	Share of investments in investee companies, where sensitive research did not discover a carbon emission reduction initiative aimed at aligning with the Paris Agreement. Due to incomplete coverage of the total investments, this does not imply that 77,77% of our investee companies do have a carbon emission reduction initiative aimed at aligning with the Paris agreement.	Helvetia publicly committed to supporting the goal of net zero greenhouse gas emissions for its investment portfolio by 2050, in line with global efforts to limit warming to 1.5°C. In the next reference period, Helvetia defines a climate strategy, where targets and next steps to reduce GHG emissions according to that goal are identified.

Table 3: Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

Indicators for social and employee, respect for human rights, anti-corruption, and anti-bribery matters

Indicators appliable to investments in investee companies

Adverse Sustainability Indicators		Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned, and targets set for the next reference period
Human Rights	9. Lack of a human rights policy	Share of investments in entities without a human rights policy	0.66%	0.76%		We adhere to the UN Global Compact principles, and we aim to invest only in investee companies that comply with these norms. Therefore, we defined conditional exclusion for counterparties violating the UN Global Compact. Our Responsible Investment team periodically performs desktop analysis of actual and potential investee companies, based on MSCI ESG research and other publicly available information. If for an actual or potential investee company a material risk of an adverse impact is identified

						and this risk cannot be sufficiently mitigated, this may lead to terminating the investment. In the next period, an Active Ownership approach will be built up to work alongside the exclusions.
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	0.24%	0.44%		We adhere to the UN Global Compact principles, and we aim to invest only in investee companies that comply with these norms. Therefore, we defined conditional exclusion for counterparties violating the UN Global Compact. Our Responsible Investment team periodically performs desktop analysis of actual and potential investee companies, based on MSCI ESG research and other publicly available information. If for an actual or potential investee company a material risk of an adverse impact is identified and this risk cannot be sufficiently mitigated, this may lead to terminating the investment. In the next period, an Active Ownership approach will be built up to work alongside the exclusions.

Indicators applicable to investments in sovereigns and supranationals

Human Rights	20. Average human rights performance	Measure of the average human right performance of investee countries using a quantitative indicator explained in the explanation column	0.74	0.74	This indicator is the 'Fundamental Rights' sub-score from the World Justice Project (WJP) Rule of Law Index. The sub-score measures a country's performance on human rights issues, as per Factor 4 of the WJP Rule of Law Index. Scores can range from 0-1.0, and higher values denote stronger national performance across a broad range of human rights issues.	Regarding international sanctions, Helvetia abstains from investments and business relations related to a specific set of countries for which comprehensive human rights motivated economic sanctions provisions prevail (imposed by the UNSC). Helvetia regularly monitors the investment portfolio to ensure that there are no hidden investments in such companies.
Governance	21. Average corruption score	Measure of the perceived level of public sector corruption using a quantitative indicator explained in the explanation column	69.80	69.46	Corruption perception measures the degree to which public sector corruption is perceived to exist in different countries around the world. Data source: Transparency International. Countries with lower scores are perceived as more corrupt, with the scale ranging from 0 to 100.	

24. Average rule of law score	Measure of the level of corruption, lack of fundamental rights, and the deficiencies in civil and criminal justice using a quantitative indicator explained in the explanation column	1.24	1.23	Capturing perceptions of the extent to which agents have confidence in and abide by the rules of society, and in particular the quality of contract enforcement, property rights, the police, and the courts, as well as the likelihood of crime and violence. Data source: Worldwide Governance Indicators (WGI). Countries with a higher score have a better rule of law, with the scale ranging from -2.5 to 2.5.

3. Description of policies to identify and prioritize principal adverse impacts on sustainability factors.

3.1 Material factors

Helvetia undertakes a process to identify how its investment activities are linked to adverse sustainability impacts. The approach is based on a comprehensive materiality analysis on various factors concerning Environmental, Social and Governance pillars. The Corporate Sustainability Team of the Helvetia Group, led by our Chief Sustainability Officer, performed a materiality analysis in April 2023. Following a "double materiality" approach, internal stakeholders from all market units examined both financial materiality (impact of sustainability matters on the company's finances) and impact materiality (impact of the company's activities on sustainability matters). Further information on the process and methodology of the materiality analysis as well as our material sustainability topics can be found in the Annual Report, chapter Sustainability Report from page 9.

In the selection process of the additional indicators from the PAI statement framework, we chose indicators that are closely related to the material topics identified by our double materiality analysis.

Consequently, Helvetia is developing and implementing step-by-step the concepts and processes around the identified material topics. This enables us to comprehensively monitor possible adverse impacts in order to manage them better with regard to our investment decisions.

3.2 Data sources

Helvetia uses mainly data from MSCI ESG to measure and monitor the principal adverse impacts of the investment portfolio. Where possible and necessary, especially for the calculation of the greenhouse gas emissions of the portfolio, the inputs are enhanced or verified with Bloomberg data or other data sources. Since there is still a lot of development going on concerning data availability and quality, data sources are regularly reviewed and can be subject to change. For deeper research on single companies, especially concerning controversies, Helvetia also conducts its own research to ensure to have the most complete picture possible.

4. Active Ownership

Helvetia expects the companies in which it invests to comply with all relevant legal and regulatory requirements in their business activities and to maintain good relationships with their stakeholders. This is a prerequisite for meeting the expectations of our customers, fulfilling the associated duties of loyalty and due diligence and safeguarding the interests of our stakeholders. In order to promote such behaviour, Helvetia plans to use its influence as an investor by exercising shareholder rights at the Shareholders' Meetings, seeking active dialogue with the companies in which it invests and through dialogue in the political and social sphere (so-called policy engagement).

Helvetia currently exercises the shareholder rights associated with its shares for the benefit of its policyholders and with the aim of good corporate governance. The dialogue with portfolio companies currently takes place on a situational basis. Helvetia is in the process of expanding its voting policy and dialogue with portfolio companies via collaborative platforms into a coordinated approach.

As a financial market player, Helvetia also influences the development of sustainable standards, particularly in the Swiss domestic market through its involvement in the public sector. As a founding member of the Swiss Sustainable Finance (SSF) association, Helvetia's actions are geared towards raising awareness of sustainability issues in the industry and actively helping to shape sustainability measures and their further development. Active participation in working groups of the SSF and the Swiss Insurance Association (SIA), which promote such developments, underpins these objectives. In order to fulfil its great responsibility, Helvetia has committed itself as an institutional asset manager to the Principles for Responsible Investment (PRI). This voluntary commitment developed by the United Nations aims to give greater consideration to environmental, social and governance factors when making investment decision.

5. References to international standards.

The management of Helvetia Group is working to align all corporate activities in such a way that they are sustainable and valuable for the society and for the environment. Our Code of Conduct contains the basic principles and rules of conduct that Helvetia expects from its employees in the fulfilment of their duties. It therefore forms the regulatory basis for compliance with legal regulations and ethical standards. Our Code of Conduct is available on Helvetia's website.

Helvetia has not yet applied any forward-looking climate scenarios. Its portfolios are globally diversified and take into account environmental as well as social and governance factors.

Helvetia is highly committed to fully adhere to the various relevant embargoes and economic sanctions regulations as this regards the investments in our funds, but also our clients, employees, and vendors. A complete list of all Helvetia memberships and partnerships can be accessed on our website.
Moreover, Helvetia takes into consideration the following commitments to uphold compliance with the highest possible standards of ethics and professional conduct:

5.1 Paris Agreement

Reference to sustainability indicators:

- Table 1, PAI 1-6 (Greenhouse gas emissions)

Helvetia publicly committed to align its investments and strategy to the 1.5-degree goal of the Paris Agreement. In that regard, Helvetia also committed to gradually reduce the emissions of its investment portfolio to net zero by 2050. Helvetia is developing the associated transition plan in line with the climate strategy. Portfolio emissions are measured annually for equities, corporate bonds and government bonds based on MSCI ESG data, with the aim of further expanding the coverage to achieve the largest possible coverage.

5.2 UN Global Compact (UNGC) and OECD Guidelines for Multinational Enterprises

Reference to sustainability indicators:

- Table 1, PAI 10: Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises)
- Table 1, PAI 11: Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises)

Helvetia has signed the United Nations Global Compact (UNGC) and endorses the OECD Guidelines for Multinational Enterprises. The UNGC and OECD outline minimal behavioral standards that serve as the basis for the enhanced engagement program as well as the exclusion policy.

5.3 Convention on Cluster Munitions and OTTAWA treaty

Reference to sustainability indicators:

- Table 1, PAI 14: Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons, and biological weapons

6. Historical comparison.

In 2024, Helvetia will again publish its PAI declaration in accordance with the template in Annex I of Commission Delegated Regulation (EU) 2022/1288. In terms of structure and content, this PAI declaration does not differ from the previous year's version. The published PAI indicators also do not differ from the previous year.

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