

## CITADEL INSURANCE P.L.C. SFDR WEBSITE DISCLOSURES

### *Article 3 SFDR*

“Citadel Insurance p.l.c. (“**Citadel**”) has adopted an environmental, social and governance policy (“**ESG Policy**”) in accordance with the provisions of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (“**SFDR**”).

Citadel does not currently consider the integration of sustainability risks into its investment decision-making processes as being directly relevant to the offering of its insurance-based investment products.

### *Article 4 SFDR*

Section titled: ‘**NO CONSIDERATION OF SUSTAINABILITY ADVERSE IMPACTS STATEMENT**’

“As a Financial Market Participant in the context of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (“**SFDR**”), Citadel Insurance p.l.c. (“**Citadel**”, the “**Company**”) hereby informs its clients that it does not consider the principal adverse impacts of its investment decisions on sustainability factors at this point in time. The reasons behind the Company’s decision include, but are not limited to, the fact that the Company considers there to be a lack of readily available data to comply with the technical reporting requirements expected of it in this regard, as well as the reality that the Company does not ordinarily make insurance-based investment products available to the public, and that consequently, the consideration of principal adverse impacts would be disproportionate to the current nature and scope of its activities.

This notwithstanding, in the short-term, Citadel is committed to developing an Environmental, Social and Governance (“**ESG**”) framework with the objective of steadily embedding processes which will enable it to allocate ever-increasing importance to ESG issues, and this for the purpose of eventually being able to consider (in the medium to long term) the principal adverse impacts of its investment decisions on sustainability factors. The Company shall also develop and define criteria to identify (where possible) any activities or industries that should be excluded from its investment decision-making services.”

### *Article 5 SFDR*

“In accordance with the provisions of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (“**SFDR**”), Citadel Insurance p.l.c. (“**Citadel**”, the “**Company**”) is required to amend its remuneration policy to include information on how this is consistent with the integration of sustainability risks, and to publish and maintain this information on its website.

The Company’s Remuneration Policy stipulates that, in view of the mitigated and, in any case, limited impact, of performance-based remuneration on the risk profile of the Company, as well as:

- (i) the nature and scale of the Company’s business; and

- (ii) the fact that the Company does not currently consider the integration of sustainability risks in its investment decision-making as being directly relevant to the offering of its insurance-based investment products,

the Company deems there to be no risk of misalignment of its remuneration procedures with the integration of sustainability risks as set out under the SFDR.”