

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

*Citadel Insurance p.l.c. (“Citadel”) does not currently make insurance-based investment products (“IBIPs”) available to the public 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”). As at the date of these disclosures, Citadel solely services saving products for guaranteed interest returns of 4.5% and 3.5%, investment bonds, and other savings plans which are currently in run-off.*

### **Article 3 SFDR**

#### **INTEGRATION OF SUSTAINABILITY RISKS**

As at the date hereof, Citadel does not consider sustainability risks to be relevant to it and the products currently serviced by it, and accordingly Citadel does not as yet integrate sustainability risks into its investment decision-making processes.

This notwithstanding, given Citadel’s commitment to environmental, social and governance (“ESG”) issues, as well as its intention to make IBIPs available to the public in 2026, Citadel acknowledges that the integration of sustainability risks into the investment decision-making processes will play a role in its future operations and IBIP offering/s. On this basis, Citadel has adopted an ESG policy (“**ESG Policy**”) which shall be updated on a semi-regular basis so as to reflect any developments in relation to Citadel’s operations.

### **Article 4 SFDR**

#### **NO CONSIDERATION OF ADVERSE IMPACTS OF INVESTMENT DECISIONS ON SUSTAINABILITY FACTORS**

Citadel hereby informs its clients that, as at the date hereof, it does not consider the principal adverse impacts of its investment decisions on sustainability factors. The reasons behind the Company’s decision include, but are not limited to, the fact that Citadel does not currently make IBIPs available to the public, and that it solely services a number of IBIPs which have been suspended for new business purposes and which are currently in run-off. Consequently, the consideration of principal adverse impacts is currently considered by Citadel to be disproportionate to the current nature and scope of its activities.

This notwithstanding, in the short-term, Citadel is committed to developing an ESG framework with the objective of enhancing the embedding of processes which will enable it to allocate ever-increasing importance to ESG issues, and this for the purpose of eventually being able to consider the principal adverse impacts of its investment decisions on sustainability factors. Citadel 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**

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

- (i) the nature and scale of the Citadel's business – which does not currently include the provision of IBIPs to the public (rather, Citadel solely services some IBIPs which have been suspended for a number of years, and which are currently in run-off); and
- (ii) the fact that Citadel does not currently consider the integration of sustainability risks in its investment decision-making process,

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

*Last amended: December 2025*