THE ONELIFE COMPANY S.A.

GOOD GOVERNANCE POLICY

REGULATION (EU) 2019 / 2088 (SFDR)

Regulatory context

Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector, the Sustainable Finance Disclosures Regulation (SFDR), requires the assessment of good governance practices of financial products promoting environmental or social characteristics, or those with a sustainable investment objective. The regulation requires that financial market participants offering these products must disclose their policies for assessing good governance practices in investee companies with respect to sound management structures, employee relations, staff remuneration, and tax compliance.

Purpose of this Policy

The OneLife Company ("The Company") offers insurance-based investment products (IBIPs) marketed within the European Union that are categorised as Article 8 products under SFDR. For such products, investing in companies that adhere to good governance practices is a prerequisite. This policy details the process for determining good governance and the research and analysis conducted to make this determination.

Definitions

The Company defines "good governance" in accordance with Article 2, point (17) of SFDR, emphasizing robust management structures, employee relations, staff remuneration and tax compliance.

In evaluating the governance practices of investee companies, the Company will at least consider factors relevant to these governance standards for investments made in companies either directly (equities) or indirectly (e.g. corporate bonds). Investments in government bonds do not have to follow the requirements related to good governance practices.

Good governance assessment of investee companies

The Company offers cross-border financial solutions through unit-linked products, such as life assurance, capitalisation or pension products, whose benefits (payable upon termination of the product) are linked to the value of investment vehicles.

The investment vehicles available through these products and in which the client can invest their premium may be of four types (depending on the product concerned):

- External funds;
- Internal collective funds (ICFs);
- Internal dedicated funds (IDFs); and/or
- Specialised insurance funds (SIFs).

These investment vehicles may be collective or individual investments, depending on the fund that is concerned. Further information on these investment vehicles can be found on our website, located in the "Investment section, which can be accessed here.

Through the investment vehicles described above, the Company primarily invests in Undertakings for Collective Investment in Transferable Securities (UCITS), equities and corporate bonds. To ensure good governance practices among investee companies, the Company relies on an external data provider's scoring.

For each underlying fund, the Company monitors the portfolio governance risk score, which is based on the governance risk scores assigned to individual companies within the portfolio by our external data provider. These scores evaluate how governance-related factors, such as board structure, executive compensation, shareholder rights, and transparency could impact a company's economic value. Furthermore, the Company monitors each underlying fund's exposure to violations of the United Nations Global Compact (UNGC) Principles and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. The UNGC refers to the ten Principles of the United Nations Global Compact which can be accessed here. The OECD Guideline are government-backed recommendations on responsible business conduct for multinational enterprises which are available here.

For equities and corporate bonds, the Company monitors their governance scores which allow it to identify governance best and worst practices. The Company further monitors their compliance with the United Nations Global Compact principles based on the controversy score obtained from our external data provider.

The Company collects and analyses the scores for all underlying funds, equities, and corporate bonds described above. For underlying funds, the Company further considers violations of UNGC and OECD guidelines. For monitoring purposes, The Company has established a proprietary governance rating for investee companies on the following scale:

When an underlying fund, equity and corporate bond receives a rating indicating higher governance risks, the Company engages with the asset manager who controls the investment decisions in these companies. The Company then conduct a detailed governance assessment through an ESG due diligence questionnaire and a proprietary scoring method, encompassing 34 criteria across general, environmental, social, and governance aspects. The governance assessment focuses on the asset manager's implementation of screening based on the governance criteria, active governance-related voting, engagement with investee companies on governance issues, and monitoring adherence of investee companies to UNGC and OECD guidelines.

The Company regularly reviews investee companies and initiates further engagement with the mandated asset managers when our proprietary rating indicates governance risks. These evaluations are integral to maintain and improve governance standards across the Company's investments. Based on the severity and duration of the governance issues in investee companies, investment exposure might be decreased, divested, or completely removed from the investment portfolio.