

EU Sustainable Finance Disclosure Regulation (SFDR)

EU Regulations effective date: 1st August 2022

Sustainability Factors – Investment/IBIPs/Pension Advice

In accordance with the Sustainable Finance Disclosure Regulation ('SFDR'), we inform you that when providing advice on insurance-based investment products/Investments, we do not assess, in addition to relevant financial risks, relevant sustainability risks as far as this information is available in relation the products proposed/advised on. This means that we do not assess environmental, social or governance events/conditions that, if they occur, could have a material negative impact on the value of the investment. The area of sustainability is relatively new and as the issue progresses, we will review our position.

Considering Principal Adverse Impacts on sustainability factors in advice:

When providing advice on insurance-based investment products ('IBIPs') or investment advice we do not consider the impacts of our advice that result in negative effects on sustainability factors (namely environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters), because, currently there is limited relevant products on the market which meet these criteria.

Ongoing SFDR:

As further information on the approach being taken by product providers, and their internal/external fund managers, becomes available over the course of the next year or so, we anticipate reviewing these areas in our assessments.