

Sustainable Finance Disclosure Regulations – Level II Requirements

Sustainability Factors

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 to 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.

Considering Principal Adverse Impacts on sustainability factors in the advice:

When providing advice on insurance-based investment products ('IBIPs') or investment advice:

- We ask you to confirm your sustainability preferences per our [Sustainability-Suitability-Assessment](#) questionnaire
- We do not generally 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 the investment managers that we place business with are at different stages of embracing these considerations and we do not believe it prudent to exclude one or more managers at present based on their relative progress under this heading.
- The firm will review this approach on an annual basis with the next review by 30 June 2023.

Impact on Return

We have not assessed the likely impacts of sustainability risks on the returns of Investment/Pensions since we have not been able to identify how sustainability risks may translate into an effect on investment returns.

Remuneration policy

We are remunerated by commission from product producers. When assessing products, we will consider the different approach taken by product providers in terms of them integrating sustainability risks into their product offering. This will form part of our analysis for choosing a product provider.

We take due care so that our internal remuneration policy with respect to investment or insurance advice on insurance-based investment products ('IBIPs') promotes sound and effective risk management in relation to sustainability risks and does not encourage excessive risk-taking with respect to sustainability risks.

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