

Sustainable Finance Disclosures Regulation

The Sustainable Finance Disclosure Regulation (“SFDR”) is part of a package of legislative measures arising from the European Commission’s Action Plan on Sustainable Finance.

The SFDR sets out harmonised rules on transparency and aims to include environmental, social and governance (ESG) “sustainability” considerations and risks in the decision-making process of investors and asset managers in a consistent manner across the EU financial services sector.

A sustainable investment product is where a product is sold as promoting environmental or social characteristics. It is envisaged that greater transparency and sustainability-related information will enable investors to compare financial products and to make informed investment decisions about ESG products.

The SFDR introduces additional disclosure obligations for manufacturers of financial products and financial advisers toward end-investors. The Regulations will require impacted firms to integrate sustainability into their investment processes and to consider the adverse impacts of their investments on sustainability factors. The requirements apply regardless of whether the client has indicated an ESG preference or not.

Financial market participants and financial advisers have similar but different obligations under the SFDR. Financial advisers are obliged to disclose to clients whether they consider sustainability considerations when providing advice to clients on investment products including insurance based investment products.

Article	
3	<p><i>In accordance with the Sustainable Finance Disclosure Regulation ('SFDR'), we inform you that in our advice with regard to insurance-based investment products ('IBIPs') we assess, in addition to relevant financial risks, relevant sustainability risks as far as this information is available in relation the products proposed / advised on. More specifically, this means that we assess environmental, social or governance events / conditions that, if they occur, could have a material negative impact on the value of the investment.</i></p> <p><i>We integrate these risks in our advice as part of our fact find process whereby, we will ask you your Sustainability preferences.</i></p>
4	<p><i>In accordance with the SFDR, in our advice with regard to insurance-based investment products ('IBIPs') or investment advice we assess the PAI information published by product manufacturers.</i></p>
5	<p><i>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.</i></p>
6	<p><i>In accordance with the Sustainable Finance Disclosure Regulation ('SFDR'), we inform you that in our advice, if you have Sustainability Preferences, with regard to insurance-based investment products ('IBIPs') we assess relevant sustainability risks, as far as this information is available in relation the products proposed / advised on. More specifically, this means that we assess environmental, social or governance events / conditions that, if they occur, could have a material negative impact on the value of the investment.</i></p>