



Irish Life

HOW IRISH LIFE FINANCIAL SERVICES (ILFS) APPROACHES SUSTAINABILITY RISKS AND ADVERSE SUSTAINABILITY IMPACTS IN THE ADVICE WE GIVE YOU ABOUT SAVINGS, INVESTMENT AND PENSIONS PRODUCTS

Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector ("SFDR")

Irish Life Financial Services (ILFS) is authorised as an insurance intermediary by the Central Bank of Ireland.

In this document when we say 'we' or 'our' we're referring to Irish Life Financial Services.

ILFS is tied to Irish Life Assurance (ILA) plc for the provision of savings, investment and pension products and we provide advice to customers in relation to these products. The ILFS approach to sustainability risks and sustainability factors in its advice process is driven by the products and investment options of ILA. ILA works with investment managers, primarily Irish Life Investment Managers (ILIM) and Setanta Asset Management, in relation to the investment funds it makes available.

1. How we take account of sustainability risks in the advice we give you

When we say 'sustainability risk' here we mean an environmental, social or governance (ESG) event or condition that could cause an actual or a potential negative impact on the value of a product we recommend to you.

We give advice on products provided by ILA. You can see how ILA approach sustainability risks for their investment products in their product disclosures and on their website at www.irishlife.ie/sustainability-disclosures. When we give you advice we use a range of information to help you make an informed decision, this includes:

- **How long you want to save or invest your money for;**
- **Whether you need your money in an emergency;**
- **Your attitude to investment risk – i.e. the**

potential for losses and gains and the volatility of investments;

- **Explaining to you how the funds we may recommend are invested and their features, including how sustainability risks are considered in the management in relation to those funds.**

ILFS does not currently take specific account of sustainability risks in its advice process. However the core funds available from ILA are managed by ILIM. ILIM is committed to managing these assets responsibly, with the objective of delivering long- term sustainable returns. ILIM has a sustainability risks policy that sets out how these risks are managed. This is available on their website at www.ilim.com/responsible-investing. This policy explains that ILIM acts in the best interests of its clients, this includes considering how sustainability risks could impact clients' investments.

How we include sustainability factors in our advice process will develop over time. This will be largely driven by the products and investment funds available from ILA and how these products factor in sustainability risks.

2. How we consider principal adverse impacts on sustainability factors in the ILFS advice process

Sustainability factors are defined as environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters. Financial Advisers, such as ILFS, have an option to consider the principal adverse impacts of investment decisions on sustainability factors in its advice process. Currently ILFS has decided not to consider such impacts separately from our overall risk framework. This decision has been made on the basis of the information available to ILFS from ILA. Under SFDR, ILA must publish a statement explaining its due diligence policies regarding the principal adverse impacts of investment decisions on sustainability factors by 30 June 2021. ILFS will actively monitor its position, and update its processes, as more information becomes available from ILA.

As explained in section 1 above the core funds made available to our customers are managed by ILIM. ILIM will monitor and report on the principal adverse impacts of its investment decisions on sustainability factors. Information on ILIM's principal adverse impacts investment due diligence policy is available on its website www.ilim.com/responsible-investing. This includes a summary in relation to the framework ILIM uses to assess and report on principal adverse impacts.

You can also find information in relation to both sustainability risks and the principal adverse impacts of investment decisions on sustainability factors on the websites of the other investment managers which ILA works with.

3. How we integrate sustainability risk into our remuneration policy

ILFS is a member of the Irish Life Group of companies and follow the group's remuneration policy. This policy ensures that we follow effective risk management and includes specific reference to the integration of sustainability risks. We do individual performance assessments with employees which consider risk management and control factors.