## SUSTAINABILITY RISK POLICY



Hansard Europe dac (**Hansard Europe**) is an authorised life assurance undertaking, regulated by the Central Bank of Ireland and previously issued and sold insurance-based investment policies. Hansard has been closed to new business since 30 June 2013 but continues to administer its existing clients and assets under administration.

Under Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (**SFDR**), financial market participants (**FMPs**) are obliged to publish on their website information about their policies on the integration of sustainability risks in their investment decision making process. Hansard is in scope of SFDR as an FMP and consequently is complying with the website disclosure requirements.

## THE INTEGRATION OF SUSTAINABILITY RISKS IN HANSARD'S INVESTMENT DECISION - MAKING PROCESS

Hansard Europe does not have a policy on the integration of sustainability risks in the investment decision making process. This is because Hansard Europe does not make investment decisions for policyholders, nor does it play a role in recommending, advising or selecting investments. This is a matter for its policyholders and their financial advisers i.e. asset managers or discretionary fund managers. Policyholders should note that their financial advisors may be obliged to disclose their own policies on the integration of sustainability risks in their investment decision making process. Hansard Europe's shareholder funds are exclusively placed on short term deposit or into money market funds.

## **CONSIDERATION OF SUSTAINABILITY ADVERSE IMPACTS**

Hansard Europe is not directly involved in the investment decision making process. However, it shall comply with the following investment criteria when considering any new investment.

With respect to the whole portfolio of assets, it shall only invest in assets and instruments whose risks it can properly identify, measure, monitor, manage, control and report, and appropriately take into account in the assessment of its overall solvency needs in accordance with Regulation 47(2)(a) of S.I. No. 485 of 2015; When identifying, measuring, monitoring, controlling, reporting and assessing risks it shall take into account sustainability risks.

## **REMUNERATION POLICY**

FMPs shall include in their remuneration policies information on how those policies are consistent with the integration of sustainability risks and shall publish that information on their website. Hansard Europe is required to have a remuneration policy under Article 258(1)(I) of Commission Delegated Regulation 2015/35. As outlined above, Hansard Europe does not integrate sustainability risks into its decision-making process and is no longer selling new products, therefore, the integration of sustainability risks is not relevant to Hansard Europe's remuneration policy.