

Hansard Europe dac (the “Company”) is a regulated Irish Insurance Undertaking that provides investment linked insurance policies that may sometimes be linked to shares traded on a regulated market. As an “Institutional Investor” under both EU regulations and Irish Company Law it is required to develop and disclose its Engagement Policy or explain why one is not published.

While clients own these insurance policies, they do not own the underlying investments, these are owned by Hansard Europe dac.

Within its Portfolio Bond products clients select their investment choice from a wide range of assets including company shares and Exchange Traded Funds. The policyholder may appoint a regulated Discretionary Fund Manager or Asset Manager to undertake the asset selection on their behalf. Discretionary Fund/Asset Managers may publish their own Shareholder Engagement Strategy that they follow.

The Company also offered a range of other products that are linked to its range of Internal Funds. These funds are not traded on an exchange.

The Company does not manage client’s asset portfolios, nor does it exercise voting rights attached to shares; this is a matter for them and their advisors (i.e. asset managers or discretionary fund managers). However, the Company supports the need for transparency in all financial dealings and the provision of clear information to inform client decisions including providing them with access to a range of information through Hansard Online (HOL).

Additionally, The Company does not make investment decisions and does not exercise voting rights attached to the shares on behalf of clients unless instructed to do so by clients on their behalf. The Company will forward corporate action notices to clients and any votes as appropriate to the relevant institution where instructed to do so by the client. Where Portfolio Bond products are linked to external assets, voting rights are exercised in line with client (or the appointed advisor) instructions which are based upon communications the Company has passed to them.

The Company’s Board has adopted a robust Conflict of Interest Policy which covers all business engagements. This supports the fair treatment of Policyholders/Clients and guides the Company to identify all potential conflicts of interest and to document and manage them appropriately.

For the financial year ended 30 June 2023 the Company did not vote on any investee company resolutions.

Taking account of the above, the Company has decided not to publish an Engagement Policy for the following reasons:

- the Company is passive when it comes to policyholder investments because it does not make investment decisions for policyholders, nor does it play a role in recommending, advising or selecting the investments.
- Separately, EU-based asset managers are required to develop and publish their own shareholder engagement policy.

Hansard Europe dac

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Hansard Europe dac is regulated by the Central Bank of Ireland (www.centralbank.ie)