

How EBS d.a.c. (EBS) 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”)

EBS d.a.c. (EBS) 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 EBS.

EBS is tied to Irish Life Assurance (ILA) plc for life and pension products and we provide advice to customers in relation to these products.

The EBS approach to sustainability risks and sustainability factors in its advice processes 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 EBS approaches the integration of sustainability risks when we give you advice about products

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. 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.

EBS does not currently take specific account of sustainability risks in its advice process. However our core funds are provided 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 EBS 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 EBS, have an option to consider the principal adverse impacts of investment decisions on sustainability factors in its advice processes. Currently EBS 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 EBS from ILA. Under the SFDR, ILA have published a statement explaining its due diligence policies about the principal adverse impacts of investment decisions on sustainability factors, which is available on its website www.irishlife.ie/sustainability-disclosures/. EBS 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 provided 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.

EBS d.a.c. is a part of the AIB Group (AIB Group is a registered business name of Allied Irish Banks, p.l.c.)

AIB has a Code of Conduct that includes the following relevant provisions:

1. We act honestly, ethically and with integrity. We comply with all relevant laws, regulations, codes and group policies.
2. We manage our business and deliver outcomes through responsible business practices and prudent risk management. We are committed to preventing the use of our products or systems to launder criminal proceeds, to finance terrorism, to evade taxation, or to bypass applicable sanctions laws.
3. We act in the best interest of our customers and treat them fairly and professionally. We promote fair customer outcomes by always putting their needs first in our advice and decision making. We provide customers with information which is both accessible and transparent to support and enable them to make informed decisions.
4. We observe proper standards of market conduct. We do not engage in or permit market manipulation. We comply with relevant market codes and stock exchange rules.
5. We manage conflicts of interest responsibly.

Sustainability is part of the fabric of how we do things in AIB. We want our business to make a positive impact by creating sustainable long-term shared value for our customers, our other stakeholders and the communities in which we live and work.

We do this through:

- Actively investing to support economic progress and social issues.
- Advancing responsible business practices such as supporting the transition to a low carbon economy in which we operate.
- Reducing AIB's own environmental carbon footprint.
- Developing positive business lending opportunities that have clear environment and climate action benefits.
- Ensuring an Environment, Social and Governance overview on potential lending opportunities.
- Encouraging and supporting involvement in community, charitable and educational activities through our AIB Together programme.

3. How we integrate sustainability risk into our remuneration policies

For the vast majority of employees, AIB currently operates a fixed remuneration policy without variable remuneration. It is intended that the introduction of any Group wide future variable remuneration policy in AIB will incorporate policies and practices to stimulate behaviour consistent with AIB's Sustainability Strategy and commitments. For those limited numbers of employees who currently participate in business specific commission schemes, sustainability risk is considered as part of the determination of final award outcomes.

EBS d.a.c. is tied to Irish Life Assurance plc for life and pensions business.

EBS d.a.c. and Irish Life Assurance plc are regulated by the Central Bank of Ireland.