

Sustainable Finance Disclosure Regulation (SFDR)

Protection & Prosperity Financial Services Limited do not specifically consider adverse impacts of investment decisions on sustainability factors in our investment or insurance advice. We have made this decision for a number of reasons, some of which are outlined below:

- Important regulatory initiatives are still ongoing to identify and properly disclose investments in sustainable economic activities, including under the EU Taxonomy. These disclosures are crucial for insurers and insurance intermediaries to assess whether the products offered match the sustainability preferences of customers.
- Some of the rules are not yet finalised and the implementation of these initiatives do not converge at the same points in time, in particular the application date of the new legislation under the IDD precedes the deadlines for reporting of company data under the Corporate Sustainability Reporting Directive and of the application of the Delegated Regulation supplementing the Sustainable Finance Disclosure Regulation.
- As the area of the SFDR is new and evolving without sufficient information being currently available from all of the product providers with which we hold an agency, we do not currently assess in detail the adverse impact of investment decisions on suitability when providing investment or insurance advice.
- The key product providers with which we engage have developed responsible investment as part of their investment philosophies and sustainability policies. However, detailed information on specific fund is not always available in order to allow us to make a full and proper assessment of their suitability in accordance with IDD and SFDR Regulations.

However, Protection & Prosperity Financial Services Limited will not prevent the customer, at his/her own initiative, from discussing their sustainability preferences in relation to any investment and insurance products and we will make best efforts to provide suitable and relevant information in relation to these products based on the data currently available.

As further information on the approach being taken by product providers, and their internal/external fund managers, becomes available over the course of the next year, we anticipate reviewing these areas in our assessments.