



INTEGRATION OF SUSTAINABILITY RISK INTO REMUNERATION POLICY – WEBSITE DISCLOSURE

1. INTRODUCTION

- 1.1 This document sets out disclosure by Irish Life Investment Managers Limited (“ILIM”) (the “**Firm**”), in respect of the integration of sustainability risk into the Firms Remuneration Policy, as required by the EU Sustainable Finance Disclosure Regulation (“**SFDR**”).
- 1.2 ILIM have updated its remuneration policy (the “**Policy**”) to reflect the integration of sustainability risks on a qualitative basis, with effect from 10 March 2021. This disclosure document is published on the Firm’s website, to provide information to the public on these matters.
- 1.3 This document may be updated from time to time and is provided for information purposes only. This document summarises how sustainability risk has been integrated into the Policy.

2. RISK ALIGNMENT

- 2.1 The Firm acknowledges that the Policy, and an individual Employee’s remuneration, must be consistent with and promote sound and effective risk management and not encourage risk-taking that exceeds the level of tolerated risk of the Firm.
- 2.2 The risk-limiting features of the Policy include (amongst other things) the application of non-financial metrics, such as an assessment of an Employee’s compliance with the Firm’s Sustainability Risk Policy, where applicable.

3. PERFORMANCE MEASUREMENT

- 3.1 Under the Policy, the Firm carries out an assessment of an individual’s performance, when assessing and determining variable remuneration. This assessment is based on both quantitative criteria and qualitative criteria.
- 3.2 The qualitative criteria used include, among others, an assessment of whether the relevant individual Employee has complied with the Firm’s sustainability policies, including the Sustainability Risk Policy.
- 3.3 A **negative** assessment of overall compliance by an individual employee with the Sustainability Risk Policy may result in a reduction in the variable remuneration amount which would otherwise have been awarded to that individual.



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