



Sustainable Finance Disclosure Regulation (Regulation (EU) 2019/2088) Statement:

The Sustainable Finance Disclosure Regulation (Regulation (EU) 2019/2088) seeks to introduce rules for Financial Market Participants ('FMP's') and Financial Advisers ('FA's') with regards to the integration of sustainability risks into their processes, as well as the provision of sustainability-related information in financial products.

The regulation will require FMP's and FA's to consider sustainability risks across various aspects of their operations, including disclosures, integration into policies, investment process, product governance and wider internal processes and systems.

The term 'sustainability risk' refers to 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 recommended to you. Sustainability Factors are defined as environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters. FMP's and FA's have an option to consider the principal adverse impacts of investment decisions on sustainability factors in their advice processes.

Newcourt Retirement Fund Managers Limited ("NRFM") only provides Model 1: Execution Services for pension and retirement products.

An 'execution-only' service is a term that is used for a service that does not offer advice when allowing investors to select its products. By nature of the execution-only service model, NRFM does not consider the principal adverse impacts on sustainability factors of investment decisions or investment advice provided by external regulated investment advisors or intermediaries.

NRFM does not provide investment advice or investment recommendations, and therefore are not in a position to influence the integration of ESG products into their clients' portfolios.

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