

Sustainability related disclosures for Zurich Trustee Services Ltd

Zurich Trustee Services Limited (“ZTSL”), in its capacity as trustee of a number of occupational pension schemes (each a “Scheme”), makes the following sustainability-related disclosures with regard to the approach of the Scheme.

ZTSL acknowledges that the Scheme is regarded as a ‘financial product’ under Article 2 of Sustainable Finance Disclosure Regulation (SFDR). The Scheme’s activities are, under Article 7 of the institutions for occupational retirement provision (IORP) II Directive, providing for pensions and related Revenue approved benefits with the objective of promoting increased financial security of its members in retirement. The Scheme’s objectives do not include the promotion of environmental or social characteristics, or good governance practices; nor does it have sustainable investment, or a reduction in carbon emissions, as its objective. In accordance with Irish pension law the Trustee may take into account the potential long-term impact of investment decisions on environmental social and governance factors but the Scheme’s purposes do not generally include the promotion of sustainable investment or ESG characteristics.

The Trustee aims to ensure that all member communications are consistent with, and transparently disclose, the Scheme’s overall approach to sustainability and ESG considerations.

Information on policies regarding the integration of sustainability risks into the investment decision-making process

ZTSL invests all scheme contributions in insurance policies provided by Zurich Life. ZTSL does not itself directly integrate sustainability risks into its or the Scheme’s investment decision processes. To the extent that the Trustee indirectly incorporates sustainability and ESG considerations (under its ESG and Responsible Investment policies), in the interests of value for money for members, and prudent management of costs of administration generally, has decided not to duplicate SFDR related disclosures and monitoring carried out by the Scheme’s investment managers where applicable. Detailed information on how Zurich Life considers sustainability risks when making investment decisions is available [here](#).

No consideration of adverse impacts of investment decisions on sustainability factors

ZTSL does not consider sustainability adverse impacts in its own right. The Trustee does not consider any adverse impacts of investment decisions on sustainability factors in its own right. The Scheme’s activity is providing for pensions and related Revenue approved benefits with the objective of promoting increased financial security of its members in retirement. This is done in a manner compliant with the investment requirements of s59AB of the Pensions Act 1990 requiring that investments are made in the best long-term financial interests of members and beneficiaries as a whole. ZTSL invests all scheme contributions in insurance policies provided by Zurich Life. As a large entity, Zurich Life is required to publish information on how it considers the principal adverse impacts of investment decisions on sustainability factors, and the extent to which it integrates environmental and social characteristics or good governance practice when making investment decisions. This information is available [here](#).

Transparency of remuneration policies in relation to the integration of sustainability risks

The remuneration policy implemented by the Trustee in accordance with the requirements of the IORP II Directive is not impacted by the approach to the integration of sustainability risks outlined above.

Zurich Trustee Services Limited

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Registered in Ireland under number 202905.

Zurich Trustee Services Limited is regulated by the Pensions Authority and the Central Bank of Ireland.

