



# Pre-Contractual Sustainability Disclosures for Easy Steps Growth Fund

**December 2023**

Version 23/1

Helping people build  
better futures

## Introduction

At Irish Life, we believe in doing right by your money by helping build a better future for all.

Through Irish Life Investment Managers (“ILIM”) we invest your money in a responsible way that benefits you and the planet.

**Product Name:** Easy Steps Growth Fund

**Legal Entity Identifier:** 6354009KK2LTCN6JWN73

### Status under the EU Sustainable Finance Disclosure Regulation (SFDR)

There are new rules which require any fund which promotes environmental and/or social characteristics to provide detailed sustainability related disclosures to prospective customers.

As this Fund has been categorised as meeting the provisions set out in Article 8 of the EU Sustainable Finance Disclosure Regulation (SFDR), this report provides further detail on what the sustainability related ambitions of the Fund are and how the sustainability related ambitions of the Fund are met.

### Investment Objective

The investment objective of the Fund is to target a positive return over the longer term in line with the risk profile of the Fund. It delivers this by investing in a multi-asset portfolio investing across a range of different asset classes and types of fixed interest investments and equity markets. The Fund is suitable for investors who have a long investment time horizon, want to earn proportionate investment returns over the long term and are prepared to take on risk in order to achieve this return. The Fund manager monitors and rebalances the fund regularly. The Fund also aims to promote specific environmental, social and governance (ESG) characteristics, including enhanced exposure to companies with better ESG characteristics and a better alignment to the low carbon transition economy.





## Environmental and/or social characteristics

### Does this financial product have a sustainable investment objective?

Yes

It will make a minimum of **sustainable investments with an environmental objective**: \_\_%

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It will make a minimum of **sustainable investments with a social objective**: \_\_%

No

It promotes **Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of \_\_% of sustainable investments

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It promotes E/S characteristics, but **will not make any sustainable investments**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



## What environmental and/or social characteristics are promoted by this financial product?

This Fund specifically aims to:



### Reduce the impact of the Fund on Climate Change

(relative to the appropriate broad market benchmark)



### Increase the Fund's exposure to companies with improved sustainability and lower ESG risk scores

(relative to the appropriate broad market benchmark)

## What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?

The indicators used to measure the outcomes of this approach are:



### Reduce the impact of the Fund on Climate Change

(relative to the appropriate broad market benchmark)

- > Reduction in carbon intensity of the portfolio versus the appropriate broad market benchmark.
- > Reduction in fossil fuel involvement of the portfolio versus the appropriate broad market benchmark.



### Increase the Fund's exposure to companies with improved sustainability and lower ESG risk scores

(relative to the appropriate broad market benchmark)

- > Reduction in the overall ESG risk scores versus the appropriate broad market benchmark.

## What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

N/A - This Fund does not commit to making sustainable investments or investments aligned with the EU Taxonomy.

While this Fund is designed to consider and contribute to the sustainability of our environment and society within the provisions of Article 8 of the SFDR, it is not specifically designed to make "sustainable investments" as defined under SFDR or to make investments which qualify as "environmentally sustainable" under the EU Taxonomy.

## How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

N/A - This Fund does not commit to making sustainable investments or investments aligned with the EU Taxonomy.

### How have the indicators for adverse impacts on sustainability factors been taken into account?

N/A - This Fund does not commit to making sustainable investments or investments aligned with the EU Taxonomy.

### How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

N/A - This Fund does not commit to making sustainable investments or investments aligned with the EU Taxonomy.

The EU Taxonomy sets out a "do no significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.



## Does this financial product consider principal adverse impacts on sustainability factors? Yes No

The Fund aims to reduce negative impacts to the environment and society. These negative impacts are also called adverse impacts, whereby the most significant adverse impacts are referred to as principal adverse impacts (PAI).

Where possible and feasible and in line with the nature of the investments, a number of adverse impacts are structurally and systematically considered as part of this Fund's investment decision making. This consideration occurs before making investment decisions and thereafter as part of our ongoing monitoring and management of that investment, where an investment is made.

We consider the following key PAIs in our decision making:



### Impact on climate change:

- > Greenhouse gas emissions
- > Carbon footprint
- > Exposure to companies active in the fossil fuel sector



### Impact on society:

- > Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
- > Exposure to controversial weapons (anti-personnel mines, nuclear weapons, cluster weapons, biological and chemical weapons, depleted uranium, and white phosphorus munitions)

Investment decisions result in more capital allocation to companies with improved PAI indicators as a result of the ESG data integration.

Further details on the principle adverse impacts can be found at <https://www.ilim.com/media/2265/ilim-pai-regulatory-document.pdf>



## What investment strategy does this financial product follow?

The Fund is passively managed and aims to perform in line with its underlying indices, less any fees and transaction costs. The investment manager replicates the securities held in the index in the proportion that they are held. The benchmark performance reflects the composite of the underlying benchmarks for each of the investment strategies used. The fund manager monitors and rebalances the Fund regularly and may change the asset mix. The Fund promotes environmental and social characteristics alongside other factors (Article 8 of the SFDR).

### What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The binding elements of the Fund's investment strategy are that;

- > a minimum proportion of 50% of the total Fund should be allocated to strategies which support the Fund attaining the promoted E/S characteristics; and
- > a minimum proportion of 70% of the Fund (excluding neutral assets\*) should be allocated to strategies which support the Fund attaining the promoted E/S characteristics

\* Assets such as cash and government bonds are deemed neutral under SFDR and excluded when calculating the weightings.

The Investment manager manages the sustainability risk appropriately across other asset classes into which the Fund invests.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

### What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

N/A - There is no committed minimum rate to reduce the scope of investments.

### What is the policy to assess good governance practices of the investee companies?

ILIM utilise independent third party data providers to make assessments on governance practices in the companies which we invest. ILIM assess good governance practices in investee companies through a number of measures which include:

- > ESG risk scores
- > Alignment with the UN Global Compact
- > Involvement in severe controversies

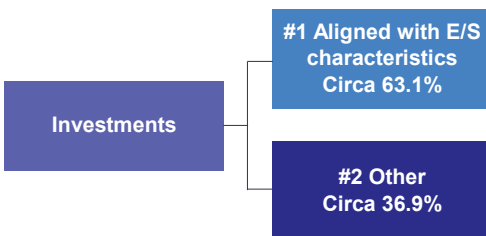


### What is the asset allocation planned for this financial product?

The Fund invests in a mix of assets such as cash, DM & EM government bonds and corporate bonds, equities and listed alternative funds such as global infrastructure and private equities. The promotion of environmental or social characteristics were applied across the below asset classes classified as Article 8 under SFDR regulation:

- i. Equity
- ii. Corporate Fixed Income
- iii. EM Government Bonds

NB - Assets such as cash and government bonds are deemed neutral under SFDR and excluded when calculating the weightings.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

### How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

Although derivatives can be used in the investment strategy, derivatives are not used to attain the environmental or social characteristics promoted by the financial product.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- > **turnover** reflecting the share of revenue from green activities of investee companies.
- > **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- > **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

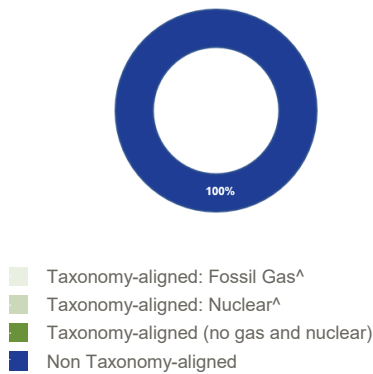
Although the Fund promotes environmental and social characteristics (Article 8 under the Sustainable Finance Disclosure Regulation) the Fund does not align with the EU Taxonomy criteria.

### Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy? (1)

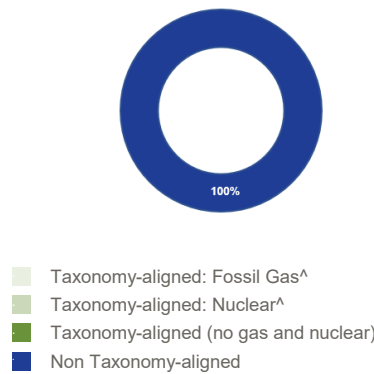
Yes
  In fossil gas<sup>^</sup>
 In nuclear energy<sup>^</sup>
  
 No

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



2. Taxonomy-alignment of investments excluding sovereign bonds\*



\*For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

<sup>^</sup>Data relating to Taxonomy aligned Fossil Gas and Nuclear is not currently available. Data relating to these activities will be populated once the data becomes available.

### What is the minimum share of investments in transitional and enabling activities?

0.0%



## What is the minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy?

N/A - This Fund does not commit to making sustainable investments or investments aligned with the EU Taxonomy.



## What is the minimum share of socially sustainable investments?

N/A - The Fund does not intend to make any investments in sustainable investments with a social objective.

(1) Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transactional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



## What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

This product may invest in assets such as bonds, equities, property, alternative strategies, and externally managed specialist funds. Investments classified as "Other" include:

- > Cash
- > Developed Sovereign Fixed Income

The investments classified as "Other" form part of the multi-asset portfolio strategy and are vital parts of the risk/return framework of the strategy as well as meeting the liquidity needs of the product, i.e. to service inflows (outflows) to (from) the product.

There are no specific environmental or social safeguards applied to this part of products assets. However, for cash, we apply our exclusion policy which sets the baseline for investments, below which companies are deemed ineligible for the investment due to the company's products, or behaviours causing harm.



## Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

The Fund follows a multi-asset strategy and does not have a reference benchmark.

### How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?

N/A - The Fund follows a multi-asset strategy and does not have a reference benchmark.

### How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?

N/A - The Fund follows a multi-asset strategy and does not have a reference benchmark or a designated index.

### How does the designated index differ from a relevant broad market index?

The broad market benchmark is a weighted average composite of the Article 8 broad market corporate fixed income and equity benchmarks. The broad market benchmark does not promote environmental and social characteristics. The Fund is a multi-asset strategy consisting of allocations to a number of investment funds in specified asset classes. These investment funds which are classified as Article 8 have individual benchmarks and the individual funds show improvements in E/S characteristics versus their individual benchmarks.

### Where can the methodology used for the calculation of the designated index be found?

N/A - The Fund follows a multi-asset strategy and does not have a reference benchmark or a designated index.

## Where can I find more product specific information online?

More product-specific information can be found on the website

<https://www.ilim.com/responsible-investing/sustainability-related-disclosures/>

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



This disclosure is being made in accordance with the Sustainable Finance Disclosure Regulation (SFDR). It does not constitute investment advice and has not been prepared based on the financial needs or objectives of any particular person, and does not take account of the specific needs or circumstances of any person. You should seek personal investment advice as to the suitability of any investment decision or strategy to your own needs and circumstances. Past performance may not be a reliable guide to future performance. Investments may go down as well as up. Funds may be affected by changes in currency exchange rates.

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