

Sustainability Risk Disclosure

Sustainable Finance Disclosure Regulation

Mediolanum International Life DAC (“MIL”) is authorised to issue life insurance products, including Investment Based Insurance Products (“IBIP”), and MIL is responsible for the general management and the administration of these products. MIL has appointed as its investment manager Mediolanum International Funds Limited (MIFL), a group company. MIFL provides discretionary portfolio management services to MIL.

MIL meets the definition of a Financial Market Participant (“FMP”) under the Sustainable Financial Disclosure Regulation (the “SFDR”). Under the SFDR, MIL is required to publish a number of entity level disclosures on its website including:

- Information on how sustainability risk has been integrated into the investment decision making process (Article 3);
- Information on how its remuneration arrangements are consistent with the integration of sustainability risk into the investment decision making process (Article 5); and
- Information on how the adverse Impacts of investment decisions on sustainability factors are considered. (Article 4).

MIFL has put in place an Investment Decision Making Process (“Investment Process”) that applies to all its clients including, funds managed by MIFL and those non-fund clients who have engaged MIFL as a discretionary portfolio manager (i.e. MIL). Whilst there may be distinct differences between the legal structure and mandates granted by different clients, MIFL follows a consistent process and implements a common governance framework for all of its investment management activities.

Environmental, Social and Governance (ESG) issues are integral to the values and culture of the Mediolanum Group. These values are also embedded in MIFL’s Investment Process. From an investment perspective, MIFL believes that taking account of ESG factors can mitigate certain risks, can add value as a quality metric in selecting investment managers and individual securities and contribute to long-term performance. Embedded through MIFL’s process is an adherence to ESG criteria, whether it be at an instrument selection and portfolio management level, or to act as a force of influence within the investment management and business community. Consequently, sustainability risks are taken into account across all products managed by MIFL, including mandates that are linked to MIL’s products.

MIFL has implemented a Responsible Investment Policy that demonstrates its commitment to integrating the factors of environment, social and corporate governance into its investment analysis, decision-making processes and the practice of actively exercising shareholder rights.



Although, MIFL considers sustainability risk and sustainability impacts as a factor in its investment decision making process, an exclusions policy has not been adopted across its clients' mandates and instead MIFL's focus is on driving change in this area.

For additional information on MIFL's Responsible Investment Policy, Remuneration Arrangements and how MIFL has integrated ESG into its Investment Process please refer to the MIFL website www.mifl.ie.