

Statement on no consideration of adverse impacts of (i) insurance advice and (ii) investment advice on sustainability factors

Statement on no consideration of adverse impacts of insurance advice on sustainability factors.

With respect to SFDR our insurance broker activities are considered as financial adviser activities. BIL, as the financial adviser does not consider any adverse impacts of investment decisions on sustainability factors. For its insurance broker activities BIL does not take any investment decisions and therefore is not able to consider the adverse impacts of such decisions. However, BIL policy on the integration of sustainability risks and consideration around principal adverse impacts are based on due diligence processes when selecting insurance companies and the associated product types. In line with the SFDR, our due diligence process includes information on product disclosures, on the way sustainability risk is integrated in the investment decision process and if PAIs are taken into consideration, as well as how each product is classified as promoting environmental or social characteristics, as a sustainable investment objective, or is a mainstream product doing neither of the above. BIL will regularly assess the situation and may consider incorporating the adverse sustainability impacts of investment decisions into sustainability factors at a later time based on this evaluation.

Statement on no consideration of adverse impacts of investment advice on sustainability factors

BIL, as the financial adviser does not consider any adverse impacts of investment decisions on sustainability factors in its investment advice. The Bank is currently seeking a solution to address the lack of adequate information regarding the identification and prioritization of adverse sustainability impacts. This information is needed to comply with recent legislation, but it is not currently available in sufficient quantity or quality. However, the respective ESG information is made available to our client advisors through recommendation lists, allowing them to take those into account when providing investment advice. When information on PAIs is available, our advisors can provide this information to the clients. BIL will regularly assess the situation and may consider incorporating the adverse sustainability impacts of investment decisions into sustainability factors at a later time based on this evaluation.



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