

How APT Wealth Management Limited (APT) approaches sustainability risks and adverse sustainability impacts in the advice we give you about savings, investment and pensions products

Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector
(“SFDR”)

APT Wealth Management Limited (APT) is authorised as an Investment Firm under European Union (Markets in Financial Instruments) Regulations 2017 and registered as an insurance intermediary under the European Union (Insurance Distribution) Regulations 2018 by the Central Bank of Ireland. In this document when we say ‘we’ or ‘our’ we are referring to APT.

The APT approach to sustainability risks and sustainability factors in its advice processes is driven by the products and investment options we advise on. APT works with investment managers in relation to the investment funds it makes available.

1. APT Wealth Management Limited (APT) approaches the integration of sustainability risks when we give you advice about our products

When we say ‘sustainability risk’ here we mean 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 we recommend to you.

When we give you advice on investment products we use a range of information to help you make an informed decision, this includes but is not limited to:

- How long you want to save or invest your money for
- Whether you need your money in an emergency
- Your attitude to investment risk – i.e. the potential for losses and gains and the volatility of investments
- Explaining to you how the funds we may recommend are invested and their features, including how sustainability risks are considered in the management in relation to those funds.

APT does not currently take specific account of sustainability risks in its advice process. However our core funds are provided by Irish Life Investment Managers Limited (ILIM). ILIM is committed to managing these assets responsibly, with the objective of delivering long-term sustainable returns. ILIM has a Sustainability Risks Policy that sets out how these risks are managed. This is available on their website at www.ilim.com/responsible-investing. This policy explains that ILIM acts in the best interests of its clients, this includes considering how sustainability risks could impact clients’ investments.

How we include sustainability factors in our advice process will develop over time. This will be largely driven by the products and investment funds available and how these products factor in sustainability risks.

2. How we consider principal adverse impacts on sustainability factors in the APT advice process

Sustainability Factors are defined as environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters. Financial Advisers, such as APT, have an option to consider the principal adverse impacts of investment decisions on sustainability factors in its advice processes. Currently APT has decided not to consider such impacts separately from our overall risk framework.

As explained in section 1 above the core funds made available to our customers are provided by ILIM. Information on ILIM's Principal Adverse Impacts Investment Due Diligence policy is available on its website www.ilim.com/responsible-investing. This includes a summary in relation to the framework the investment managers use to assess and report on Principal Adverse Impacts.

3. How we integrate sustainability risk into our remuneration policies

APT is a member of the Irish Life Group of companies and follow the Group's Remuneration Policy. This policy ensures that we follow effective risk management and includes specific reference to the integration of sustainability risks. We do individual performance assessments with employees which consider risk management and control factors.