

PRINCIPAL ADVERSE IMPACTS DISCLOSURE STATEMENT

The EU Sustainable Finance Disclosure Regulation (“SFDR”) requires Ark Life Assurance Company dac (ALAC) to publish a statement in relation to its due diligence policies about the principal adverse impacts of ALAC investment decisions on sustainability factors. The legislation for disclosure standards continues to evolve so ALAC is taking a principles-based approach to compliance with the SFDR standards.

Ark Life is part of the Irish Life Group, and the majority of Ark Life’s investments are managed by our sister company Irish Life Investment Managers (ILIM). ILIM has a framework for considering principal adverse impacts (PAI).

This framework looks at two main factors:

1. Companies whose products or services cause harm when used as intended or;
2. Companies where there is a persistent breach of international standards on company behaviour.

ILIM monitors and reports on the PAI metrics as required under SFDR. ILIM is a member of the United Nations Principles for Responsible Investment network (UNPRI) and reports annually according to the UNPRI framework.

A small proportion of the investment funds we offer are managed by external fund managers and their engagement policies can be viewed on their websites.

We believe an investment manager investing on our behalf should publish a PAI disclosure statement.

You can find ILIM’s Voting Policy and Engagement Policy here.

<https://www.ilim.com/responsible-investing/active-ownership/>