

Sustainable Finance Disclosure Regulation

In accordance with the Sustainable Finance Disclosure Regulation ('SFDR'), we inform you that in our advice with regard to insurance-based investment products ('IBIPs') we assess, in addition to relevant financial risks, relevant sustainability risks as far as this information is available in relation the products proposed / advised on. More specifically, this means that we assess environmental, social or governance events / conditions that, if they occur, could have a material negative impact on the value of the investment.

*We integrate these risks in our advice in the following way: **An assessment of sustainability risks are integrated into our Investment Advice and our Insurance Based Investment Advice through the following means:***

- *The product information provided to us by the Product Producers and Insurers on the integration of sustainability risks.*
- *Our professional interrogation of the information provided by the Product Producers and Insurers.*
- *Our in house Investment research as we keep our Investment knowledge current and relevant.*
- *We will advise you of the likely impacts of sustainability risks on the returns of the financial products we may recommend. This will be advised to you in your Statement of Suitability (SoS).*
- *Our in house Investment research as we keep our Investment knowledge current and relevant.*

Remuneration and ESG considerations:

- *We are usually remunerated by commission from the Product Producers and Insurers with whom we facilitate Investment and Insurance Based Investment transactions on your behalf.*
- *This commission payment will not influence our decision to recommend a particular product. We consider how the Product Producers and Insurers have integrated sustainability risks into their investment product offerings prior to making our recommendations to our clients.*

If considering Principal Adverse Impacts on sustainability factors in the advice:

*In accordance with the SFDR, in our advice with regard to insurance-based investment products ('IBIPs') or investment advice we assess the PAI information published by product manufacturers as follows: **As above***

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Directors: J. Bruen, D. Bruen.

We take due care so that our internal remuneration policy with respect to investment or insurance advice on insurance-based investment products ('IBIPs') promotes sound and effective risk management in relation to sustainability risks and does not encourage excessive risk-taking with respect to sustainability risks.

If sustainability risks are deemed relevant:

In accordance with the Sustainable Finance Disclosure Regulation ('SFDR'), we inform you that in our advice with regard to insurance-based investment products ('IBIPs') we assess relevant sustainability risks, as far as this information is available in relation the products proposed / advised on. More specifically, this means that we assess environmental, social or governance events / conditions that, if they occur, could have a material negative impact on the value of the investment.

*We integrate these risks in our advice in the following way: **As above***

*We also assess the likely impacts of sustainability risks on the returns of the IBIPs on which we advise. We estimate that the likely impacts of sustainability risks on the returns of **all investment and pension funds that we recommend are on the basis of the information about the likely impacts of sustainability risks on the returns in the product documentation provided by the product manufacturer.***

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