



Website Disclosures For RAFI ESG Developed Indexed Fund 2022

Helping people build
better futures

Introduction

At Irish Life, we believe in doing right by your money by helping build a better future for all.

Through Irish Life Investment Managers (“ILIM”) we invest your money in a responsible way that benefits you and the planet.

Product Name: RAFI ESG Developed Indexed Fund

Legal Entity Identifier: YYV6S3OE6EWZYI2FFW31

Status under the EU Sustainable Finance Disclosure Regulation (SFDR)

There are new rules which require any fund which promotes environmental and/or social characteristics to provide detailed sustainability related disclosures to prospective customers.

As this Fund has been categorised as meeting the provisions set out in Article 8 of the EU Sustainable Finance Disclosure Regulation (SFDR), this report provides further detail on what the sustainability related goals of the Fund are and how the sustainability related goals of the Fund are met.

Investment Objective

The Fund follows the RAFI ESG Developed Euro Unhedged Index. This Index helps investors achieve the dual objectives of sustainability and long-horizon outperformance by combining traditional ESG metrics with financial discipline and gender diversity measures and with the proven return engine of the Fundamental Index approach.



Summary

This financial product promotes environmental or social characteristics but does not have as its objective sustainable investment.

This Fund specifically aims to:

1. Reduce the impact of the Fund on Climate Change (relative to the appropriate broad market benchmark)
2. Increase the Fund's exposure to companies with improved sustainability and lower ESG risk scores (relative to the appropriate broad market benchmark)

The Fund follows the RAFI ESG Developed Euro Unhedged Index. This Index helps investors achieve the dual objectives of sustainability and long-horizon outperformance by combining traditional ESG metrics with financial discipline and gender diversity measures and with the proven return engine of the Fundamental Index approach.

The estimated proportion of equities which promote environment and social (E/S) characteristics is circa 95%.

The Fund is a passive product and invests in developed market equities and may carry a small cash balance for liquidity purposes. The promotion of environmental or social characteristics are applied across the equity investments and the investment are classified as Article 8 under SFDR regulation.

ILIM relies on third party ESG data from Sustainalytics. Sustainalytics have developed methodologies to assess companies' ESG credentials. ILIM utilises the ESG data from Sustainalytics to monitor the E/S characteristics of the Fund. The E/S characteristics of the Fund are reported periodically to internal executive committees.

ESG data is provided for the underlying holdings with each security having a series of ESG indicators. The indicators used to measure the promotion of the E/S characteristics of the Fund are carbon intensity, fossil fuel involvement and ESG risk score.

There are limitations regarding ESG data and some available ESG data is based off estimated data due to the lack of publicly disclosed information.

ILIM utilises ESG data to take into account sustainability factors including a number of principle adverse impact ("PAI") indicators. The E/S characteristics promoted by the Fund are monitored to assess if these E/S characteristics have been attained.

The Fund engages in active ownership and actively engages with companies to improve their E/S characteristics. The Fund also uses its voting power to vote to promote E/S characteristics. The fund manager of the Fund, ILIM, has an active ownership programme, which ILIM enacts on behalf of the Fund. ILIM also tackles many specific environmental and social characteristics through engagement activities, either directly with companies or collaboratively with other investors. Engagement topics include transition climate risks such as physical climate risks, biodiversity, water, waste, human-rights, supply-chain labour standards, modern slavery, anti-discrimination, anti-corruption and ESG risk.

The Fund follows a passive investment strategy and the designated index promotes E/S characteristics due to the integration of ESG data. The broad market index does not consider the promotion of E/S characteristics and is weighted based on market capitalisation. The designated index is based on the constituents of the broad market index. Through a exclusionary based methodology applied by the benchmark provider to the broad market index, the designated index is formed. The broad market benchmark is the RAFI Fundamental Developed Index.

No sustainable investment objective

This Fund promotes environmental and/or social characteristics but does not have a sustainable investment objective.

While this Fund is designed to consider and contribute to the sustainability of our environment and society within the provisions of Article 8 of the SFDR, it is not specifically designed to make “sustainable investments” as defined under SFDR or to make investments which qualify as “environmentally sustainable” under the EU Taxonomy.

Environmental or social characteristics of the financial product

This Fund specifically aims to:

Reduce the impact of the Fund on Climate Change (relative to the appropriate broad market index)

Increase the Fund’s exposure to companies with improved sustainability and lower ESG risk scores (relative to the appropriate broad market benchmark)

The indicators used to measure the outcomes of this approach are:

Reduce the impact of the Fund on Climate Change

- > Reduction in carbon intensity of the portfolio versus the appropriate broad market benchmark.
- > Reduction in fossil fuel involvement of the portfolio versus the appropriate broad market benchmark.

Increase the Fund’s exposure to companies with improved sustainability and lower ESG risk scores (relative to the appropriate broad market benchmark)

- > Reduction in the Environmental, Social, Governance and overall ESG risk scores versus the appropriate broad market benchmark.

Investment Strategy

The Fund may invest in developed market equities and is a high risk fund. The Fund promotes E/S characteristics alongside other factors (Article 8 of the SFDR).

The Fund tracks a RAFI designed index. The following approach is applied within the index as per the RAFI Index methodology:

1. The index excludes companies from the parent index that are associated with fossil fuels, controversial weapons and civilian firearms, gambling and tobacco.
2. The index excludes the bottom 10% of the parent benchmark by individual scores across relating to Environment, Social, Governance, Financial discipline and Diversity.
3. Re-weights the constituents with a tilt towards higher ESG companies based on a company's overall ESG score

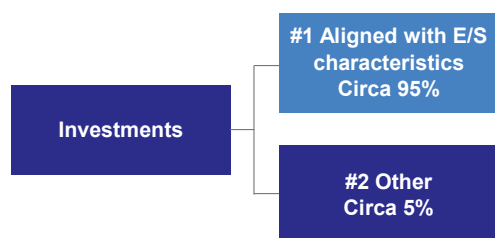
As a responsible investor, ILIM adopts an active ownership approach across its equity holdings by using its voting rights and constructively engaging (either directly or collaboratively with other like-minded investors) with the companies in which it invests. It does this to support and encourage the adoption of positive sustainable behaviours within these companies.

The index utilises ISS ESG data to make assessments on governance practices in the companies in which the Fund is invested. The index which the Fund tracks assess good governance practices in investee companies through the consideration of companies' governance score in the investment process.

Sound management structures, employee relations, remuneration of staff and tax compliance are all considered and are component parts which contribute to the ESG risk score of an investee company.

Proportion of Investments

The estimated proportion of assets within the Fund which promote E/S characteristics is represented below as per #1.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The Fund has direct exposures to investee companies through investments in listed assets. The Fund may have indirect exposures to investee companies through derivative investments.

Monitoring of environmental or social characteristics

The Fund is a passive offering which tracks a RAFI designed index. ILIM relies on third party ESG data from Sustainalytics to assess the E/S characteristics of the index which the Fund tracks. Sustainalytics have developed methodologies to assess companies' ESG credentials. Companies are assigned sustainability related scores based on their activities and ESG credentials.

ILIM utilises the ESG data from Sustainalytics to monitor the E/S characteristics of the Fund. The agreed environmental and social indicators used to measure the attainment of the characteristics promoted by the product are independently monitored by ILIM's Investment Risk team at a Fund level. The E/S characteristics of the Fund are reported periodically by ILIM's Investment Risk team to ILIM's Responsible Investing Governance Committee and the ILIM board. Exceptions are highlighted and addressed where appropriate.

Methodologies for environmental or social characteristics

The extent to which environmental and social characteristics promoted by the Fund are met, these are measured using a series of aggregated metrics using data from our third party data provider Sustainalytics.

The Fund is a passive product which promotes E/S characteristics. ESG data for the underlying holdings is available through our third-party ESG data provider Sustainalytics with each security having a series of ESG indicators.

A weighted average score of the underlying holdings is calculated for each of the E/S characteristics promoted by the Fund. The weighted average scores are used to demonstrate how environmental and social characteristics promoted by the Fund are met.

Data sources and processing

ILIM, as fund manager, obtains the data and evaluates each of the E/S characteristic promoted from our chosen ESG data provider, Sustainalytics (<https://www.sustainalytics.com>). Sustainalytics is a market leader in the provision of ESG data.

Sustainalytics provide ESG data on the environmental and social characteristics promoted by the Fund. ESG data is sourced from Sustainalytics for the individual company holdings of the Fund for each of the indicators which monitor the environmental and social characteristics. ILIM as Fund manager of the Fund, monitor the quality of data received and companies which have environmental/social scores that are judged to be outliers within the Fund are reviewed against other third party data providers and if necessary, queried with Sustainalytics.

For the Fund's investments, each indicator to assess the impact of the environmental and social characteristic promoted by the Fund is calculated for each individual security using a weighted average of the Sustainalytics data score for the individual metrics, and these are then aggregated to determine the overall product score.

A formulaic expression of the calculation is below:

Individual company score = Weight of security in portfolio * Sustainalytics score for the individual sustainable metric

Fund score for sustainable metric = Sum of individual company scores held in the Fund

ESG data and metrics attributed to the environmental and social characteristics promoted by the Fund will contain estimated data due to a lack of public disclosure by individual companies. As the requirements to report ESG data differ between jurisdictions, and as many companies are only starting to produce ESG measurements themselves, a significant portion of the data is estimated by our ESG data provider Sustainalytics. Gaps in corporate disclosure are partially filled with the help of Sustainalytics' estimation models (e.g. targeting GHG emissions) to provide a fuller picture of the portfolio's impacts. Disclosure of ESG data is improving over time with more companies publicly disclosing ESG related data.

Limitations to methodologies and data

As mentioned, there are limitations regarding both methodologies and data. For some equities ESG data is unavailable due to the lack of publicly disclosed information. In these instances estimated ESG data is used.

Gaps in corporate disclosure are partly filled with the help of Sustainalytics' estimation models (e.g. targeting GHG emissions) to provide a more complete picture of the portfolio's impacts. For equities where ESG data is not directly available, these are not included in the calculation.

Disclosure of ESG data is improving year and year with more companies publicly disclosing data to support the environmental and social characteristics promoted by the Fund.

Due Diligence

The Fund follows a passive investment approach and invests in a RAFI designed ESG integration index. RAFI utilise their own proprietary ESG data to take into account sustainability factors. RAFI integrate ESG data into the investment decision making process to exclude the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

When assessing the environmental and social characteristics of the underlying assets of the Index, RAFI incorporate ESG data into the investment decision making process to exclude companies from the parent index that are associated with controversial weapons, civilian firearms, tobacco, fossil fuels and gambling. The E/S characteristics promoted by the Fund are monitored to assess if these E/S characteristics have been attained.

Engagement Policies

The Fund engages in active ownership and actively engages with companies to improve their environmental and sustainable characteristics. Additionally, the Fund uses its voting power to promote environmental and sustainable characteristics. The Fund manager, ILIM, has an active ownership programme, which ILIM enacts on behalf of the Fund.

The active ownership programme focuses on core ESG themes, which can be categorised under two mega themes: decarbonisation and a trend to a more stakeholder centric business model concentrating on four priority thematic areas: climate change, natural capital, human rights and corporate governance.

ILIM's new bespoke voting guidelines promote environmental and social characteristics through two mechanisms:

- > Shareholder proposal support: Through ILIM's progressive voting policy aligned with ILIM's four priority thematic areas, we support well-constructed ESG shareholder proposals across the environmental and social characteristics the Fund promotes.
- > Voting action against directors: ILIM's bespoke guidelines vote against directors on companies with low gender & ethnic board diversity, companies without independent leadership and companies underperforming on climate oversight, strategy and action.

In addition, our voting guidelines integrate direct voting action against companies on non-discretionary portfolios that would fall under ILIM's Exclusion Policy, including companies with UN Global Compact breaches, severe controversies, controversial weapon exposure, production/generation of highly polluting fossil fuels (thermal coal, oil sands, arctic oil) among others. This is further strengthened by ILIM's bespoke policy incorporating voting action against unresponsive companies that ILIM are engaging with on a variety of environmental and social topics.

ILIM also tackles many specific environmental and social characteristics through engagement activities, either directly with companies or collaboratively with other investors. Engagement topics include transition climate risks, physical climate risks, biodiversity, water, waste, human-rights, supply-chain labour standards, modern slavery, anti-discrimination, anti-corruption and ESG risk.

Designated reference benchmark

The Fund follows a passive indexation strategy and aims to replicate the reference benchmark. The reference benchmark is designed by RAFI and is designed to promote the E/S characteristics. The reference benchmark is called the RAFI ESG Developed Euro Unhedged Index.

The reference benchmark is designed by RAFI, the benchmark provider, and is designed to promote E/S characteristics. It is an exclusionary based benchmark which integrates ESG data to ensure the reference benchmark is continuously aligned with the E/S characteristics promoted by the Fund. Through the passive indexation strategy of the Fund, the fund mimics the constituent weights of the reference benchmark.

The Fund follows a passive indexation strategy and aims to replicate the reference benchmark. As a result the investment strategy of the Fund is aligned with the methodology of the Index on a continuous basis.

The designated index promotes E/S characteristics due to the integration of ESG data. The broad market index does not consider the promotion of E/S characteristics and is weighted based on market capitalisation. The designated index is based on the constituents of the broad market index. Through an exclusionary based methodology applied by the benchmark provider to the broad market index, the designated index is formed. The broad market benchmark is the RAFI Developed Equity Investable Universe. For the purposes of this document, the E/S characteristics are shown versus Solactive GBS Developed Markets Large & Mid Cap Index which is very similar to the broad market benchmark.

The methodology pertaining to the reference benchmark is available at the below website link:
<https://www.rafi.com/index-strategies/rafi-esg-indices>

The methodology pertaining to the broad market benchmark is available at the below website link:
<https://www.rafi.com/content/dam/rafi/documents/index-notice/RAFI%20Indices%20Starting%20Universe.pdf>

This disclosure is being made in accordance with the Sustainable Finance Disclosure Regulation (SFDR). It does not constitute investment advice and has not been prepared based on the financial needs or objectives of any particular person, and does not take account of the specific needs or circumstances of any person. You should seek personal investment advice as to the suitability of any investment decision or strategy to your own needs and circumstances. Past performance may not be a reliable guide to future performance. Investments may go down as well as up. Funds may be affected by changes in currency exchange rates.

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