

Sustainable Finance Disclosures Regulation

The Sustainable Finance Disclosure Regulation (“SFDR”) is part of a package of legislative measures arising from the European Commission’s Action Plan on Sustainable Finance.

The SFDR sets out harmonised rules on transparency and aims to include environmental, social and governance (ESG) “sustainability” considerations and risks in the decision-making process of investors and asset managers in a consistent manner across the EU financial services sector.

A sustainable investment product is where a product is sold as promoting environmental or social characteristics. It is envisaged that greater transparency and sustainability-related information will enable investors to compare financial products and to make informed investment decisions about ESG products.

The SFDR introduces additional disclosure obligations for manufacturers of financial products and financial advisers toward end-investors. The Regulations will require impacted firms to integrate sustainability into their investment processes and to consider the adverse impacts of their investments on sustainability factors. The requirements apply regardless of whether the client has indicated an ESG preference or not.

Financial market participants and financial advisers have similar but different obligations under the SFDR. Financial advisers are obliged to disclose to clients whether they consider sustainability considerations when providing advice to clients on investment products including insurance based investment products.

When providing advice Santiago Investment Advisors does not currently consider the adverse impacts of investment decisions on sustainability. The firm will review this approach at least annually.