

Sustainable Finance Disclosure

Regulation (SFDR) Disclosure Document

How VinFin Ltd T/A Claffey & Egan Financial Brokers approaches sustainability risks and adverse sustainability impacts in the advice we give you about savings, investment and pension products.

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

VinFin Ltd T/A Claffey & Egan Financial Brokers is regulated by the Central Bank of Ireland, as a Multi-agency Intermediary, authorised under the Investment Intermediaries Act, 1995; as a Mortgage Intermediary authorised under the Consumer Credit Act, 1995; and as an Insurance Intermediary registered under the European Communities (Insurance Mediation) Regulations 2005. Copies of our Regulatory Authorisations are available upon request. The Central Bank of Ireland holds registers of regulated firms. You may contact the Central bank of Ireland on Tel: +353 1 2246000 alternatively visit their website at www.centralbankofireland.ie to check our authorisations. In this document when we say ‘we’ or ‘our’ we are referring to **VinFin Ltd T/A Claffey & Egan Financial Brokers**

VinFin Ltd T/A Claffey & Egan Financial Brokers holds written agency appointments with product providers (please see Appendix on page 3 of our Terms of Business Document for full details), who work with investment managers, for the provision of savings, investment and pension products and we provide advice to customers in relation to these products. The Claffey & Egan Financial Brokers approach to sustainability risks and sustainability factors in its advice processes is driven by the products and investment options of these product providers in relation to the investment funds it makes available.

1. How VinFin Ltd T/A Claffey & Egan Financial Brokers 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.

We give advice on products provided by those product providers that we hold written agency appointments with. You can see how each product provider approaches sustainability risks for their investment products in their product disclosures and on their websites. When we give you advice we use a range of information to help you make an informed decision, this includes:

- 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.

VinFin Ltd T/A Claffey & Egan Financial Brokers does not currently take specific account of sustainability risks in its advice process. 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 from the product providers and how these products factor in sustainability risks.

2. How we consider principal adverse impacts on sustainability factors in the VinFin Ltd T/A Claffey & Egan Financial Brokers 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 **VinFin Ltd T/A Claffey & Egan Financial Brokers**, have an option to consider the principal adverse impacts of investment decisions on sustainability factors in its advice processes. Currently **VinFin Ltd T/A Claffey & Egan Financial Brokers** has decided not to consider such impacts separately from our overall risk framework. This decision has been made based on the information available to **VinFin Ltd T/A Claffey & Egan Financial Brokers** from the product providers. **VinFin Ltd T/A Claffey & Egan Financial Brokers** will actively monitor its position, and update its processes, as more information becomes available from the product providers.

As explained in Section 1 above the funds made available to our customers are provided by the product providers. They will monitor and report on the principal adverse impacts of its investment decisions on sustainability factors.

You can also find information in relation to both sustainability risks and the principal adverse impacts of investment decisions on sustainability factors on the websites of the product providers.

3. How we integrate sustainability risk into our remuneration policies

VinFin Ltd T/A Claffey & Egan Financial Brokers has its own 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.

Get in Touch

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