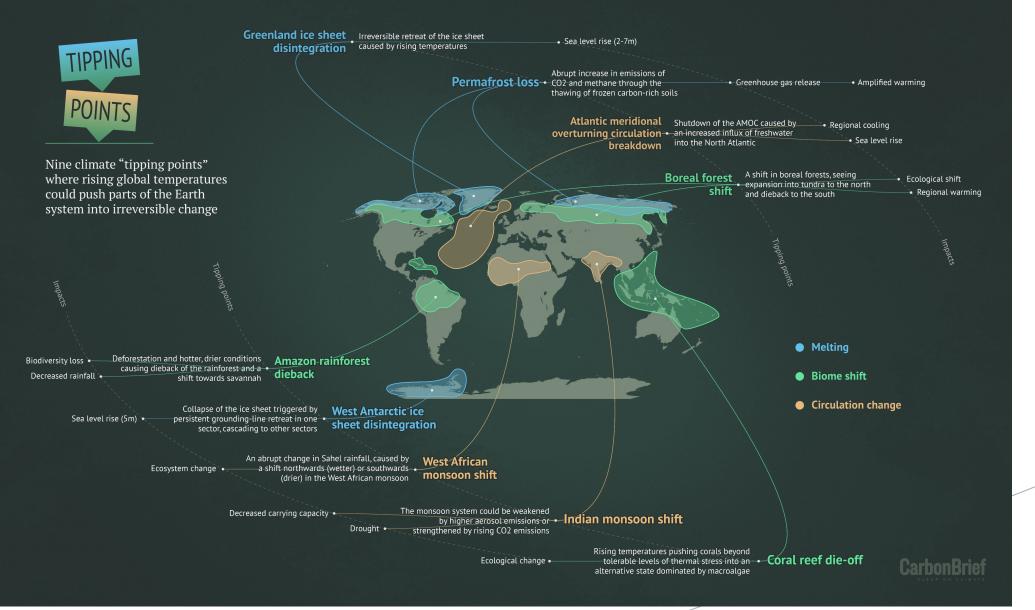
# Tackling the sustainability challenges in the financial sector

Virginia Schreurs, Sustainability Manager Assuralia



# What's all the fuss about?



# **Global reaction**

#### > 2015 - COB21: Adoption of the Paris Agreement

The Agreement sets long-term goals to guide all nations:

- ✓ substantially reduce global greenhouse gas emissions to limit the global temperature increase in this century to 2 degrees
   Celsius while pursuing efforts to limit the increase even further to 1.5 degrees;
- ✓ review countries' commitments every five years;
- ✓ provide financing to developing countries to mitigate climate change, strengthen resilience and enhance abilities to adapt to climate impacts.

The Agreement is a **legally binding international treaty**. It entered into force on 4 November 2016. <u>193 Parties</u> (192 countries plus the **European Union**) have joined the Paris Agreement.



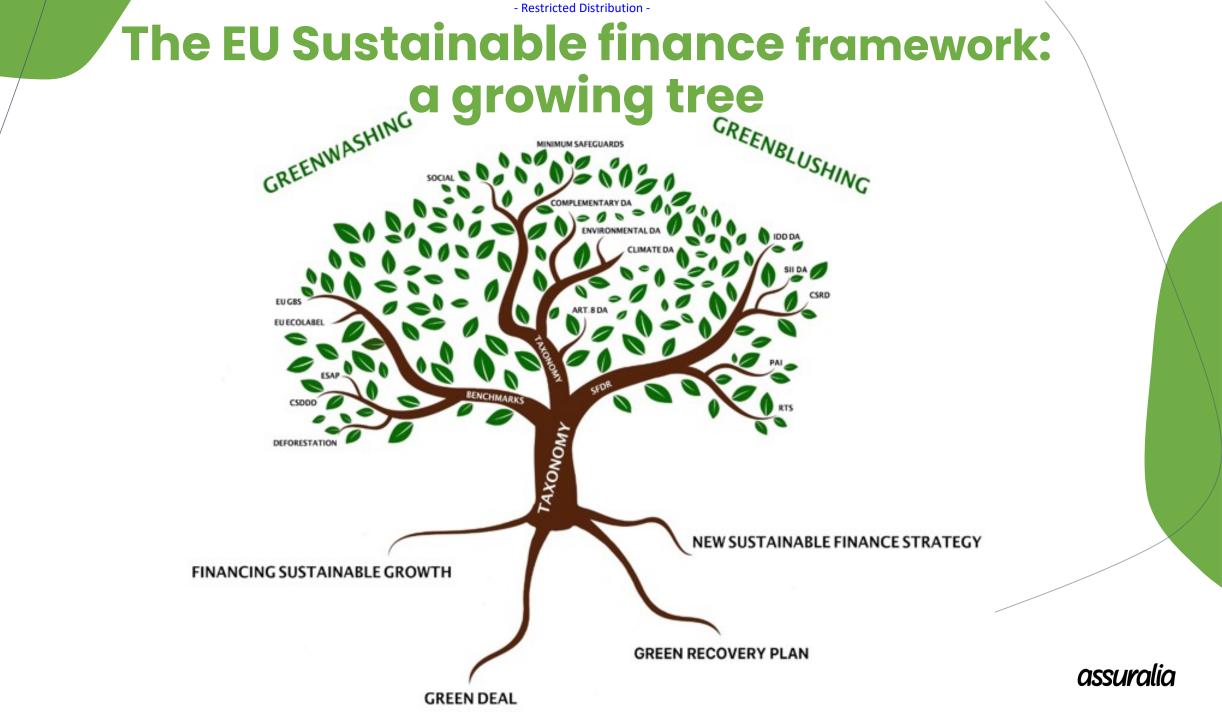


# EU solution: the EU Sustainable finance framework

### But what is this framework?



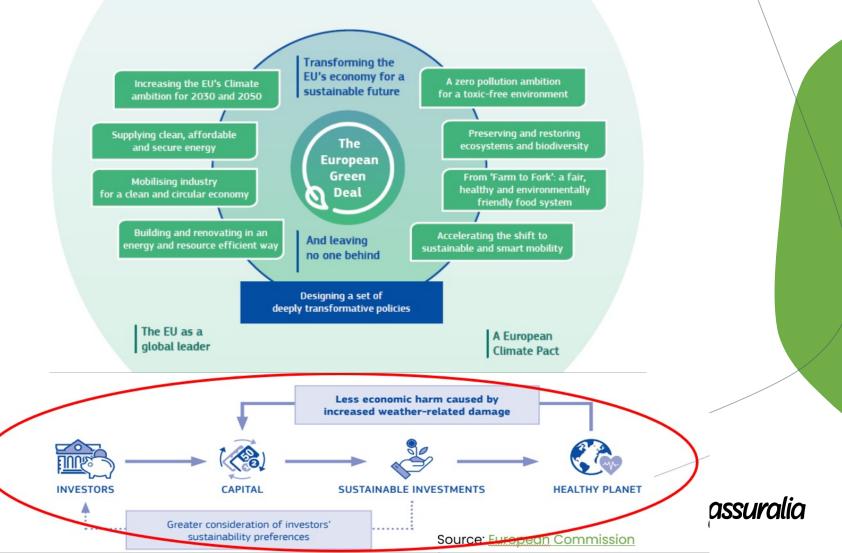
• An Ikea furniture without assembly instructions?



# Why is the EU Sustainable finance framework being developed?

### The **roots** of the tree:

- NextGenerationEU: the EU's plan to emerge stronger and more resilient after the crisis
- EU Green deal: The EU's plan to become the first climate-neutral continent by 2050.
- Sustainable Finance Strategy: an ambitious and comprehensive package of measures to help improve the flow of money towards sustainable activities across the European Union.



1 Jan '28

2026 27'28

H1



## SUSTAINABLE FINANCE

Implementation timeline for SFDR | TR | CSRD | MiFID | IDD | UCITS | AIFMD

#### 1 Jan '22 - 31 Dec '23

Financial undertakings disclose proportion of assets exposed to taxonomy non-eligible and eligible economic activities under Art 8 TR DA

#### 1 Jan '22 - 31 Dec '22

Non-financial undertakings disclose taxonomy-eligible and non-taxonomy-eligible activities under Art 8 TR DA

#### 1 Jan '22

Periodic product disclosures in Art 11(1)-(3) SFDR start to apply

H1

Sustainability related provisions

under UCITS and AIFMD DAs apply

#### 1 Jan '22

Product disclosures under Art 5 and 6 TR start to apply for the 'first two environmental Art 7 SFDR disclosures objectives'

1 Aug '22

2 Aug '22

### 30 Dec '22 🔘

2022

First FMP PAI statement

30 Jun '23

under SFDR

on product-level PAI consideration applies

H2

#### 1 Jan '23 0

1 Jan '23

Non-financial undertakings start disclosing the full KPIs on taxonomy-alignment under Art 8 TR DA

#### Application of SFDR **CSRD** applies to third **Delegated Regulation** country companies and listed SMEs/small FI

2024

H1&H2

3 Oct '23 O O 1 Jan '24 MiFID II GLs on suitability and product

governance apply

2023

H1&H2

**Financial undertakings start** disclosing the full KPIs on taxonomyalignment under Art 8 TR DA

2025

H1&H2

1 Jan '26 **CSRD** applies to listed SMEs and small & non-complex FI on an optional basis

2021

H1&H2

30 Jun '21

Large FMPs must

a summer la southly Aut a

# How can we find a way through the chaos?





# What is important for a financial intermediary?

1. SFDR-transparency obligations: entity & product level

2. Sustainability preferences under IDD & MiFID



### SFDR-transparency obligations – entity level

What?	Who?	Where?	
Sustainability risk policy	Financial institutions <sup>1</sup> & financial advisors <sup>2</sup>	website	
Adverse sustainability impact :			
Principal adverse impacts (PAI) of investment decisions on sustainability factors → If considered: statement on due diligence policies (mandatory as of 1 June 2021 for >500 employees) → If not considered: reasons why	Financial institutions <sup>1</sup>	website	
<ul> <li>Principal adverse impacts (PAI) on sustainability factors considered in advice</li> <li>→ Whether considered in advice</li> <li>→ Why not considered in advice</li> </ul>	Financial advisors <sup>2</sup>	website	
<b>Remuneration policies</b> in relation to the integration of sustainability risks	Financial institutions <sup>1</sup> & financial advisors <sup>2</sup>	website	
<sup>1</sup> SFDR uses the term 'financial market participant' for a group of financial institutions under scope, cfr. art. 2, (1) <sup>2</sup> Exemption for financial advisors that employ fewer than three persons, cfr. art. 17			

## SFDR-transparency obligations - product level

/	What?	Who?	Where?	
	<ul> <li>Integration of sustainability risks</li> <li>→ Manner in which integrated in investment decisions/ advice &amp; result of assessment of likely impact on return</li> <li>→ Where deemed not relevant: clear &amp; concise explanation of the reasons</li> </ul>	Financial institutions <sup>1</sup> & financial advisors <sup>2</sup>	Precontractual disclosures	
	<ul> <li>Adverse sustainability impact</li> <li>→ Reasoned explanation whether, and if so, how a financial product considers PAI on sustainability factors</li> <li>→ If not considered: a statement &amp; the reasons</li> </ul>	Financial institutions <sup>1</sup>	Precontr. discl & periodic reporting	
	Promotion of environmental or social characteristics (' <b>art. 8 product</b> ') → See templates RTS	Financial institutions <sup>1</sup> (financial advisors provide the customer with the product information prior to conclusion of the contract)	Websites & Precontr. discl. & periodic reporting	
	Sustainable investments (' <b>art. 9 products</b> ') → See templates RTS	Financial institutions <sup>1</sup> (financial advisors provide the customer with the product information prior to conclusion of the contract)	Websites & Precontr. discl. & periodic reporting	
	19 10 2023			assural

# Sustainability preferences under IDD & MiFID

#### **Objective**

Ensure that **sustainability preferences of (potential) clients** are correctly taken into account in the advisory process and portfolio management

### What are these sustainability preferences?

- a) the customer determines that a minimum proportion should be invested in environmentally sustainable investments as defined under the EU Taxonomy
- b) the customer determines that a minimum proportion should be invested in **sustainable investments** as defined under the SFDR
- c) the customer determines consideration of '**Principal Adverse Impacts**' on sustainability factors demonstrated by qualitative or quantitative elements



## What tools are at your disposal? (1)

#### (hyperlinks are embedded in the items) Deel III. Duurzaamheidsvoorkeuren (die deel uitmaken van uw ESMA beleggingsdoelstellingen in het deel II) Let op : de Europese regelgeving over duurzaamheid is nog in volle ontwikkeling. Dit zal mogelijk in de toekomst nog aanpassingen vereisen van deze bemiddelingsfiche. Assuralia We informeren hierbij naar uw duurzaamheidsvoorkeuren, met name of en in welke mate u wil dat uw verzekeringsproduct één of meerdere duurzaamheidsaspecten bevat. Guidelines Onder duurzaamheidsaspecten wordt verstaan on certain aspects of the MiFID II suitability requirements MiFID/IDD: Waarom Categorie a) Er wordt belegd in economische activiteiten die bijdragen aan een milieudoelstelling volgens gedetailleerde wettelijke criteria. worden mijn duurzaam-Categorie b) Er wordt belegd in economische activiteiten die bijdragen aan een milieudoelstelling heidsvoorkeuren gevraagd? en/of aan een sociale doelstelling die algemener werden gedefinieerd door de wetgever. Categorie c) Bij de beleggingsbeslissingen wordt rekening gehouden met de belangrijkste ongunstige Nieuwe Europese regels als je belegt effecten die deze kunnen hebben op ecologische, sociale en werkgelegenheidszaken: eerbiediging met advies of binnen vermogensbeheer van de mensenrechten; bestrijding van corruptie en omkoping. Financieel overzicht van de klan Verdere verduidelijkingen vindt u in de toelichtingsnota over duurzaamheidsvoo Door u opgebouwde kenni Beleg je of wil je dat gaan doen? Of wordt je MiFID II en IDD · Vindt u het belangrijk dat uw verzekeringsproduct één of meerdere duurzaam vermogen beheerd? Vanaf 2 augustus 2022 zal jouw bank, verzekeraar of tussenpersoon ook MiFID staat voor Markets in Financial bevat? naar je duurzaamheidsvoorkeuren vragen. Het Instruments Directive en trad reeds in wordt een essentieel onderdeel bij het opmaken weinig kenni: veel kennis werking in 2007. Haar opvolger, MiFID II Algemene financiële kennis van jouw spaar- of beleggingsprofiel, dat is in 2018 in werking getreden. Het is een rekening houdt met jouw specifieke noden en Nee, mijn verzekeringsproduct hoeft niet noodzakelijk duurzaamheidsaspe heeft weinig algemene financiële kennis Europese richtlijn die de spelregels vastlegt Productkennis verwachtingen. die financiële instellingen moeten volgen als te bevatten. kent volgende spaar- en beleggingsverzekeringe tak 21-verzekeringer ze je beleggingsproducten aanbieden of als tak 23-verzekeringen zonde Er treden vanaf dan nieuwe Europese regels ze je daarover advies geven. Ja, het is belangrijk voor mij dat mijn verzekeringsproduct die belegt in kapitaalsbescherming (MIFID & IDD) over duurzaamheid in werking Guidance on the integration of duurzaamheidsaspecten bevat. Op die manier zal je als klant uitgebreid kennis tak 23-verzekeringen met IDD staat voor Insurance Distribution kunnen maken met het aanbod van duurzame kapitaalsbescherming vastrentende producter Directive. Dat is de Europese richtlijn die sustainability preferences in the Indien u het laatste vakje heeft afgevinkt, gelieve de volgende vragen te beants tak 26-kapitalisatieverrichti beleggings- en verzekeringsproducten. Het regels over de distributie van verzekeringen uiteindeliike doel is om te evolueren naar een bevat. Het doel van de IDD is ervoor suitability assessment under the meer duurzame maatschappij. Voor jou betekent zorgen dat iedereen, die bij de verkoop van Productervaring het dat ie bank, verzekeraar of tussenpersoon verzekeringen betrokken is, dezelfde regels Wat ziin uw duurzaamheidsvoorkeuren ? **Insurance Distribution Directive** heeft belegd in volgende spaar- en beleggingsverzekeringer tak 21-verzekeringer - als je dat wilt - rekening gaat houden met ie volgt. duurzaamheidsvoorkeuren bij de invulling van het tak 23-verzekeringen zonde (IDD) advies over je spaar- of beleggingsportefeuille of je kapitaalsbescherming die heleat in aandeler Ik wil dat mijn verzekeringsproduct duurzaamheidsaspecten bevat, maar ik mandaat in kader van vermogensbeheer. tak 23-verzekeringen met kapitaalsbescherming vastrentende producte heb deen specifieke voorkeur. tak 26-kapitalisatieverrichtin Deze brochure geeft je een handig overzicht van wat dit voor jou als consument betekent. Ik heb een voorkeur dat mijn verzekeringsproduct één of meerdere van de volgende duurzaamheidsaspecten bevat: **Bijkomende toelichting** er dient de specifieke motivering te worden ingevuld, wanneer wordt afgeweken van bovenstaande scoring of deze scoring wordt aangepas categorie a) Uw financiële sit categorie b) Uw huidige financiële situati

weinig financiële middele

heeft ruime financiële mogelijkheden om te investeren. verwacht dat uw financiële situatie in de toekomst ruime financiële middeler

Algemene financiële situatie

in positieve zin zal wiizia

On

hold

# What tools are at your disposal? (2)

 $\succ$  Labels  $\rightarrow$  focus on investments

 $\succ$  European information documents  $\rightarrow$  focus on products

SFDR **art. 8 product** = a financial product that promotes, among other characteristics, environmental or social characteristics, or a combination of those characteristic

SFDR art. 9 products = a financial product that has sustainable investment as its objective and an index has been designated as a reference benchmark

19.10.2023



**Does this financial product have a sustainable investment objective?** [tick and fill in as relevant, the percentage figure represents the minimum commitment to sustainable investments]

× No

Yes

It will make a minimum of sustainable investments with an environmental objective: %

> in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It will make a minimum of

social objective: %

sustainable investments with a

It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of \_\_\_% of sustainable investments

> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It promotes E/S characteristics, but will not make any sustainable investments

# **Does it stop here?**

At sector level we will continue to:



✓ Voice our concerns to obtain more feasible & effective rules

 Discuss and collaborate with all stakeholders involved to come to a uniform and logical interpretation and application of legislation

Provide training, tools & documentation



# Will insurers be able to continue to insure society against climate risk?

HO Increased frequency of natural catastrophies !



1 year after storms Eunice & Franklin: insurers paid out almost 573 million euros

#### Update overstromingen juli 2021 De verzekeraars betaalden 2 miljard € aan

vergoedingen uit, de totale geschatte kosten bedragen op 31 december 2.4 miljard €.

Het verzekeren van een natuurramp is niet evident. Natuurrampen hebben het kenmerk dat de schade op alle vlakken - menselijk, materieel en economisch - astronomisch hoog kan zijn en veel mensen tegelijkertijd kan treffen. Sinds 2007 werd in België de dekking van overstromingen verplicht opgenomen in de brandverzekering éénvoudige risico's *(woningen en handelszaken)* en werd de schadevergoeding geregeld via een partnership tussen verzekeringssector en overheid waarbij de tussenkomst bij wet *(art. 130 van de verzekeringswet)* geplafonneerd werd om de solvabiliteit van de betrokken verzekeringsondernemingen ten alle tijden te kunnen vrijwaren. Global insured catastrophe losses rise to USD 112 billion in 2021, the fourth highest on record, Swiss Re Institute estimates



# The question is not IF but HOW

#### Key =

1. Good understanding of risks:

sound modelling and good scientific knowledge

&

2. Public-private partnership: with national governments on prevention and sharing of risks

# Good understanding of risks

Sustainability risk is integrated in the prudential management of the insurer

> Included in the 'Prudent person principle'

#### Which risks?

- ✓ Underwriting & Asset risks
- Transition risks & physical risks (see next slide)
- First **priority** = climate change (next probably biodiversity)

#### Methodology

- ✓ Forward looking modelling;
- ✓ Scenarios:

>2°C ( 7 physical risk) <2°C ( 7 transition risk) "With respect to the whole portfolio of assets, insurance and reinsurance undertakings shall only invest in assets and instruments whose **risks** the undertaking concerned can properly identify, measure, monitor, manage, control and report, and appropriately take into account in the assessment of its overall solvency needs" (art. 132, 2 <u>Solvency II</u>)

SENSITIVITY ANALYSIS OF CLIMATE-CHANGE RELATED TRANSITION RISKS

EUROPEAN INSURERS' EXPOSURE TO PHYSICAL CLIMATE CHANGE RISK

Potential implications for non-life busine

EIOPA-22/27 20 May 2022



Graph 8: Supervisory probability and impact assessment: transition and physical risks

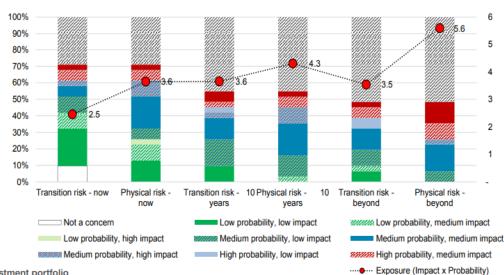


Table 1: Climate-related risks and insurance investment portfolio

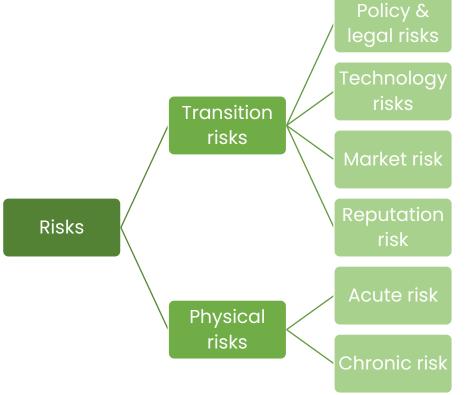
Asset class	Relevance of climate-related risk			
Asset class	Physical risk	Transition risk		
Sovereign bond	Depends on the intrinsic exposure of a jurisdiction to physical risk events (for instance, the debt of jurisdictions most exposed to a rise in sea levels may suffer in case of a global warming quicker than anticipated).	Through the need for additional fiscal spending on adaptation programmes, or via impacts on governments where the economy is heavily reliant on fossil fuels.		
Corporate bond	Depends on the location or sector, eg exposure to agriculture may suffer from decreasing yields, for instance when extreme weather-related events become more common and damage crops.	Borrowers, bonds and/or counterparties that fail to properly address transition risk may suffer losses due to deteriorating creditworthiness.		
Equity	Depends on the location or sector, eg exposures to corporates that have facilities in flood areas may suffer from equity price shocks after major flooding.	An impairment of financial asset values due to the low-carbon transition, for instance stranded assets, may decrease the value of carbon/GHG intensive sectors.		
Loans/ mortgages	Depends on the location. For example, lien assets located in areas more prone to flood risk or other weather-related events.	Loans to debtors may be impaired if the debtors fail to address climate change issues		
Real estate	Depends on the location. For example, buildings located in areas more prone to flood risks may experience suspension of business activities and increased credit losses, eg of corresponding mortgages and lower market values. <sup>10</sup>	Buildings with low energy efficiency may be prone to transition risks, for instance if new regulation forced all properties to meet certain higher sustainability standards, leading either to stranded assets or significant investments to meet the higher standard.		

#### Source: IAIS data collection

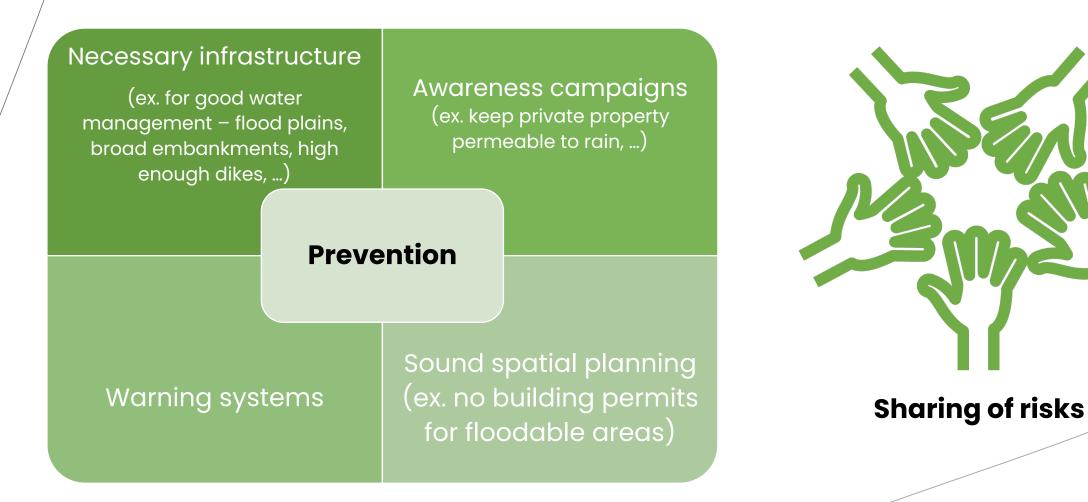
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Physical risk & transition risks



# **Public-private partnership**



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