

TR and SFDR disclosures obligations

Summary table

Legal Reference	Entity level or product level disclosure	Disclosure Content	Disclosure Type	Are level 1 provisions complemented by the RTS	Application of level 1 obligation	Application of the RTS provisions
Article 3 SFDR	Entity level	Sustainability risks policy	Website	No	10 March 2021	N/A
Articles 4(1)(a), 4(2), 4(3), 4(4) 4(5)(a) SFDR	Entity level	Principal adverse impacts (PAI) of investment decisions on sustainability factors at entity level	Website	Yes	10 March 2021 30 June 2021 for financial market participants or parent undertakings of financial market participants with more than 500 employees	1 January 2023 – First statement to be published by 30 June 2023 relating to a reference period (including PAI indicators in Table 1 of Annex 1) in relation to previous calendar year – First possible reference period under the RTS is 1 January 2022 – 31 December 2022 and the statement covering that reference period must be published no later than 30 June 2023.
Articles 4(1)(b), 4(5)(b) SFDR	Entity level	If PAI is not considered at the entity level	Website	Yes	10 March 2021	1 January 2023
Article 5 SFDR	Entity level	Consistency of remuneration policies with the integration of sustainability risks	Remuneration policies	No	10 March 2021	N/A
Article 6 SFDR	Financial product	Integration of sustainability risks into investment decisions and investment advice	Pre-contractual	No	10 March 2021	N/A
Article 7(1) SFDR	Financial product	Consideration of PAI at the product level	Pre-contractual	No	30 December 2022	N/A
Article 7(2) SFDR	Financial product	No consideration of PAI at the product level	Pre-contractual	No	10 March 2021	N/A
Article 8 SFDR Article 6 TR	Financial product	Pre-contractual disclosures for products promoting environmental or social characteristics	Pre-contractual	Yes	– article 8(1) and 8(2) SFDR – 10 March 2021 – taxonomy disclosures for climate adaptation and mitigation (under articles 9(a) and 9(b) TR) - 1 January 2022 taxonomy disclosures for remaining environmental objectives under articles 9(c) to 9(f) TR - 1 January 2023	1 January 2023

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Article 9 SFDR Article 5 TR	Financial product	Pre-contractual disclosures for products with sustainable investment objective	Pre-contractual	Yes	<ul style="list-style-type: none"> 10 March 2021 (Article 9(1), (2) and (3) SFDR) 1 January 2022 for the taxonomy-related disclosures for environmental objectives referred to in Article 9(a)-(b) TR (Article 9(4a) SFDR) January 2023 for the taxonomy-related disclosures for environmental objectives referred to in Article 9(c)-(f) TR (Article 9(4a) SFDR) 	1 January 2023
Article 10 SFDR	Financial product	Website disclosures for Article 8 and 9 SFDR products	Website	Yes	10 March 2021	Article 10 SFDR
Article 11 SFDR Article 5 and 6 TR	Financial product	Periodic disclosures for Article 8 and 9 SFDR products and Article 5 and 6 TR products	Periodic	Yes	<ul style="list-style-type: none"> Periodic disclosures issued from 1 January 2022, including the taxonomy-related disclosures for environmental objectives referred to in Article 9(a)-(b) TR (Article 11(1) SFDR) 1 January 2023 for the taxonomy-related disclosures for environmental objectives referred to in Article 9(c)-(f) TR (Article 11(1)(c) and (d) SFDR) 	Periodic disclosures issued from 1 January 2023 including the taxonomy-related product disclosures
Article 12 SFDR	Entity and financial product levels	Review of disclosures	Website	No	10 March 2021	N/A
Article 13 SFDR	Entity and financial product levels	Marketing communications not contradicting disclosures in SFDR	N/A	Optional Implementing Technical Standards (ITS)	10 March 2021	Article 13 SFDR

For further information, please contact:



Jose Pascual
Managing Partner

T: +35 2 27 86 46 95
M: +352 661 74 30 28
josepascual@
eversheds-sutherland.com



Julian Brown
Partner

T: + 44 20 7919 0539
M: + 44 778 577 8628
julianbrown@
eversheds-sutherland.com



Philip Spyropoulos
Partner

T: + 44 20 7919 4735
M: +44 776 682 0902
philspyropoulos@
eversheds-sutherland.com



Marta Gajos
Associate

T: +35 2 27 86 46 99
M: +352 661 116 974
martagajos@
eversheds-sutherland.com