

EU Sustainable Finance Disclosure Regulation

Remuneration policy disclosure for Towers Watson Investment Management Limited

The remuneration policy (“the Policy”) of Towers Watson Investment Management Limited (“TWIM”) who is subject to the EU Sustainable Finance Disclosure Regulation (“SFDR”) includes information on the integration of sustainability risks in TWIM’s remuneration procedures, as required by the SFDR.

TWIM acknowledges that this Policy, and an individual employee’s remuneration, must be consistent with and promote sound and effective risk management, including sustainability risks and not encourage risk-taking that exceeds the level of tolerated risk of TWIM.

The risk-limiting features of this Policy include amongst other things application of non-financial metrics, such as an assessment of an employee’s compliance with TWIM’s risk management and compliance with policies including the Sustainability Risk Policy.

TWIM carries out an assessment of an individual’s performance, when assessing and determining variable remuneration. For relevant individual employees, the qualitative criteria used include an assessment of whether the relevant individual employee has complied with TWIM’s sustainability-related policies, including but not limited to the Sustainability Risk Policy.

This assessment of compliance with sustainability-related policies will be carried out by a senior manager responsible for the employee and will form part of the overall performance assessment framework of TWIM. The results of the assessment will provide, amongst other factors, key input in the determination of the employee’s annual variable pay.

About WTW

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