

# «Al via la rivoluzione ESG: prime ipotesi applicative e impatti per la Funzione Compliance»

Web seminar, 4 marzo 2021

In collaborazione con

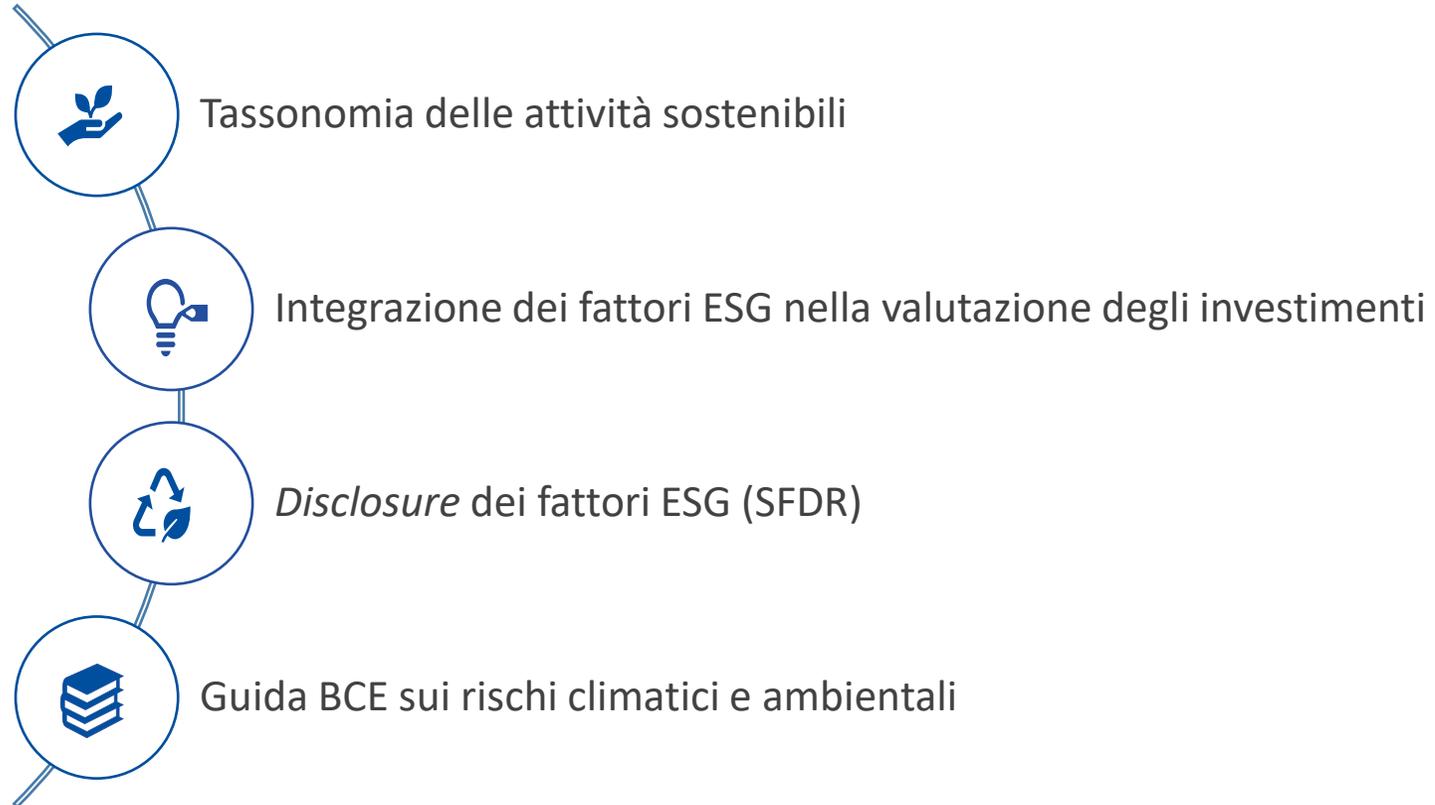




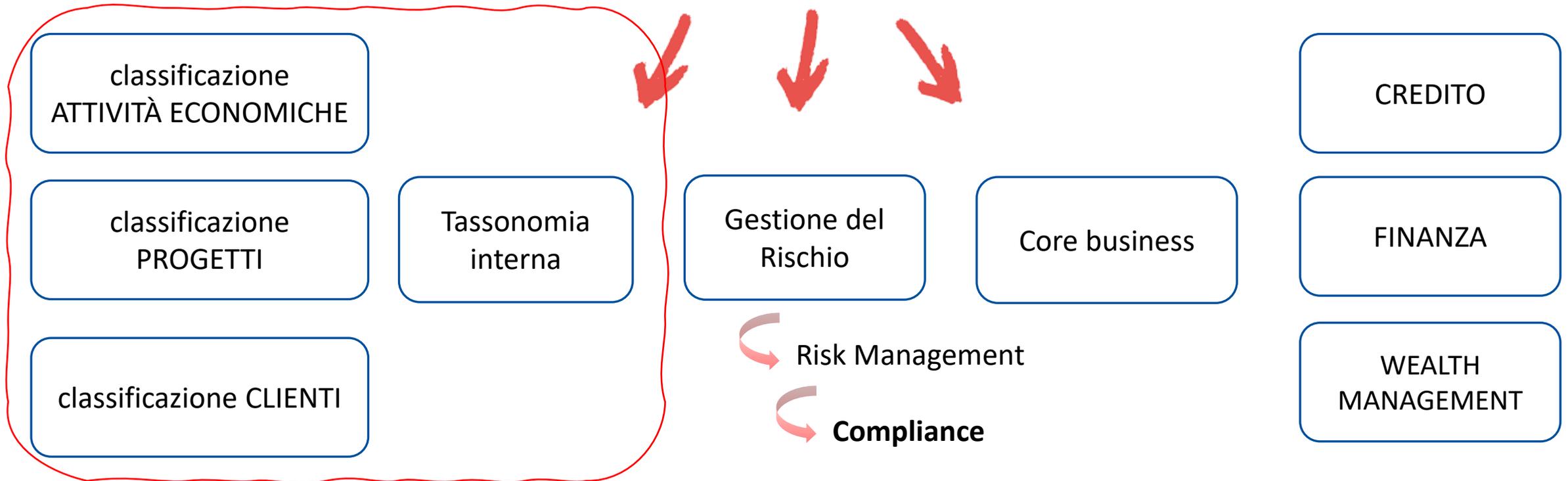
# ESG e processi di governance: il ruolo della Compliance

Giuseppe Zaghini  
*Compliance Governance, Iccrea Banca*

AICOM, 4 marzo 2021



## Gestione integrata dei fattori ESG



Impatti su Politiche di Gruppo, Processi, Procedure IT, Organizzazione

## Ruolo centrale della Compliance

---



### EBA Discussion paper

On management and supervision of ESG risks for credit institutions and investment firms

*The compliance function also complements the risk management framework and monitors the alignment of institutions' activities with legal and regulatory requirements on all legal aspects, including ESG regulatory aspects and sustainability as well as institutions' own internal policies. The risk management function and **the compliance function play a key role** in the approval of new products, e.g. environmentally sustainable credit facilities if relevant, or significant changes to existing products, processes and systems.*

Molto dipende dalle **scelte strategiche** dell'intermediario



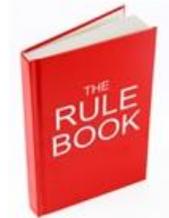
## Disclosure

- Informativa alla clientela\*
- Documentazione di offerta dei prodotti (ex art. 8 e 9 SFDR)\*
- Informativa sulle politiche di remunerazione

\* the ESAs recommend national competent authorities to encourage financial market participants and financial advisers to use the interim period from 10 March 2021 until 1 January 2022 to prepare for the application of the RTS. (cfr Joint ESA Supervisory Statement on the application of the SFDR 25.02.2021)

## Quadro normativo

- Monitoraggio normativo
- Analisi impatto «on-going»
- Feedback presa in carico



## Processi interni

- Strategie e modelli distributivi
- Verifiche su caratteristiche di sostenibilità (in particolare su GP e OICR)
- Meccanismi di valutazione di adeguatezza
- Flussi informativi distributore-produttore