

Q1 Please submit:

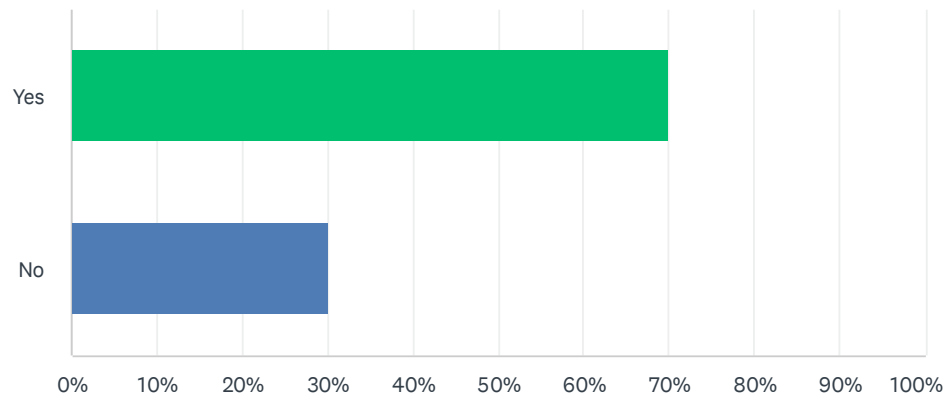
Answered: 10 Skipped: 0

ANSWER CHOICES	RESPONSES	
Country of Member Association	100.00%	10
Name of Member Association	100.00%	10
Name of person completing the response	100.00%	10
Email of person completing the response	90.00%	9

Q2 Governance and Prudential Standards

Has there been sufficient experience in your country to comment on the impact of the governance requirements in IORP II?

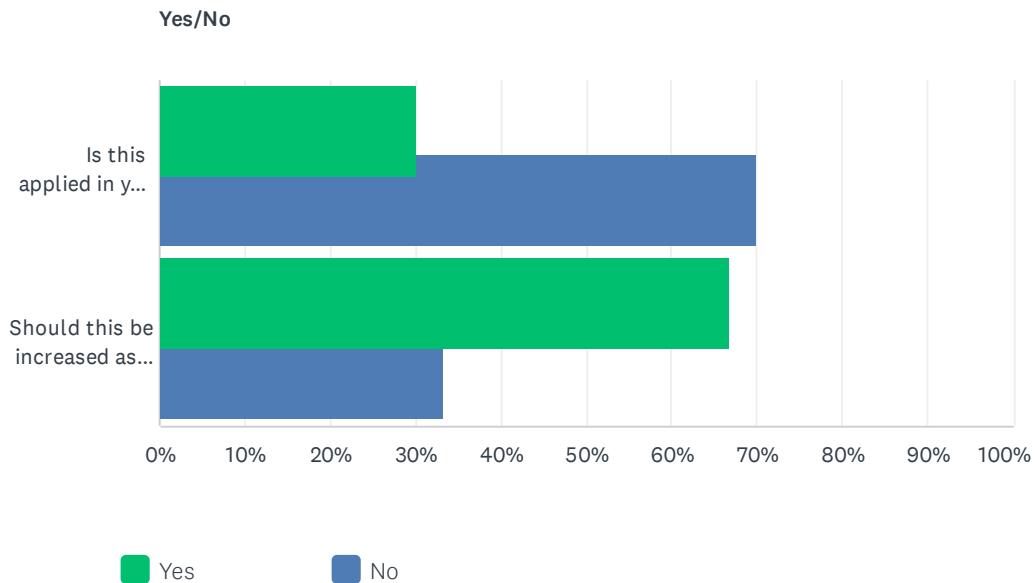
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ANSWER CHOICES	RESPONSES	
Yes	70.00%	7
No	30.00%	3
TOTAL		10

Q3 Governance and Prudential Standards The current threshold below which Member States may exempt IORPs from most of the requirements of the Directive (under Article 5) is 100 members and beneficiaries.

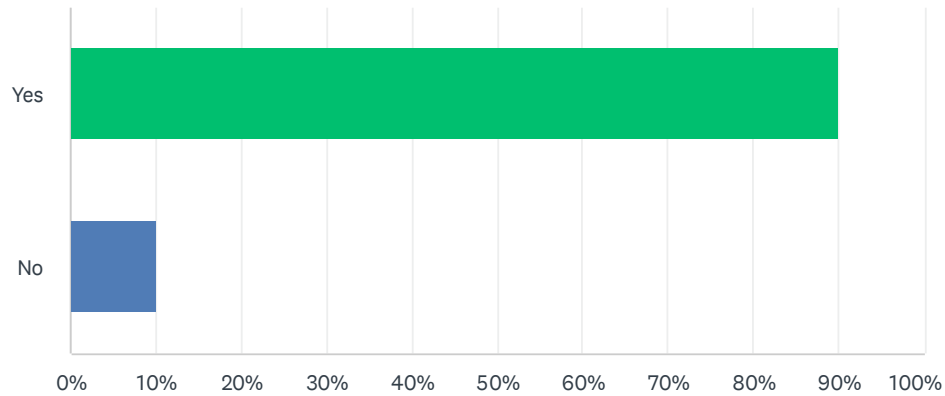
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Yes/No			
	YES	NO	TOTAL
Is this applied in your country?	30.00% 3	70.00% 7	10
Should this be increased as proposed by EIOPA to less than 1,000 members and beneficiaries and €50m in assets?	66.67% 6	33.33% 3	9

Q4 Governance and Prudential Standards EIOPA proposes to provide for some exemptions from IORP requirements for IORPs which are above the Article 5 threshold but are considered “low-risk”. Do you agree?

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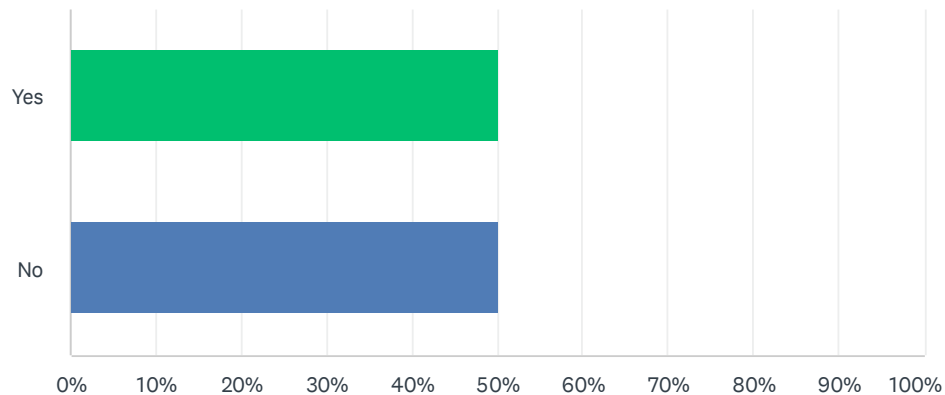


ANSWER CHOICES	RESPONSES	
Yes	90.00%	9
No	10.00%	1
TOTAL		10

Q5 Governance and Prudential Standards EIOPA proposes that IORPs should be required to carry out a “standardised risk assessment” by reference to a common balance sheet determined on a market-consistent basis, similar to the approach used for the 2022 stress tests, although no changes are proposed in relation to harmonisation of solvency valuations.

Do you support this proposal?

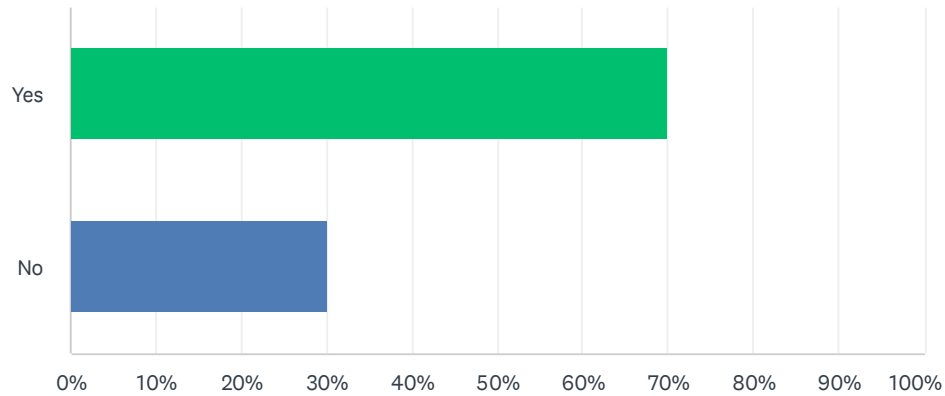
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ANSWER CHOICES	RESPONSES	
Yes	50.00%	5
No	50.00%	5
TOTAL		10

Q6 Pensions Benefit Statements (PBS) Has there been sufficient experience in your country to comment on whether the PBS is achieving its objective of providing clear and comprehensive information to IORP members?

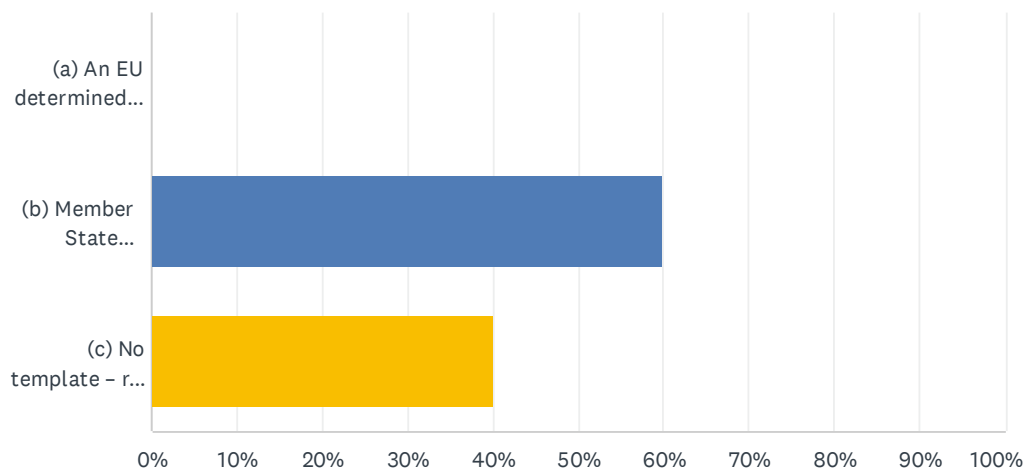
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ANSWER CHOICES	RESPONSES	
Yes	70.00%	7
No	30.00%	3
TOTAL		10

Q7 Pensions Benefit Statements (PBS) EIOPA's consultation document considers some possible changes to the Directive in relation to the PBS. One proposal is to mandate a standardised template for the PBS, either at EU level or Member State, along with some amendments to the general principles. Would you support:

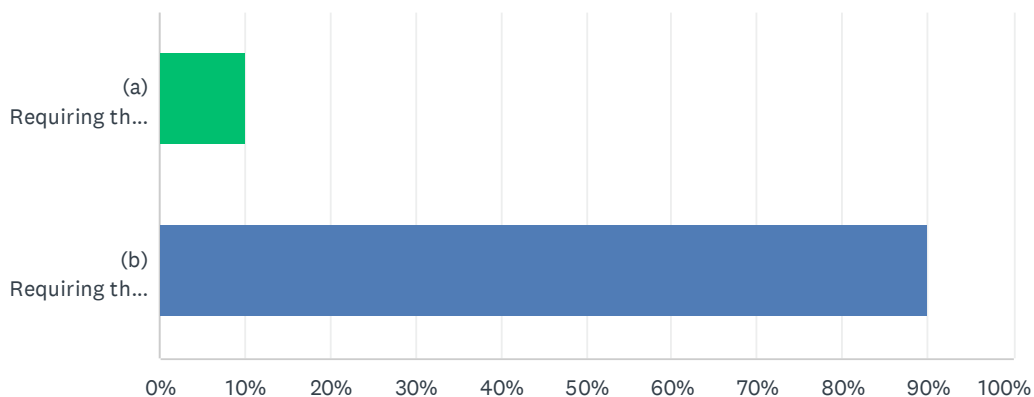
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ANSWER CHOICES	RESPONSES	
(a) An EU determined template which all IORPs in the EU would be required to use	0.00%	0
(b) Member State determined template which all IORPs in that country would be required to use	60.00%	6
(c) No template – rely on general principles	40.00%	4
Total Respondents: 10		

Q8 Pensions Benefit Statements (PBS) The Directive currently requires the PBS to be produced in paper or digital format. If the IORP decides to provide the PBS in digital format, a paper copy must be supplied to any member or beneficiary who requests it. EIOPA has considered (please check the relevant box you support):

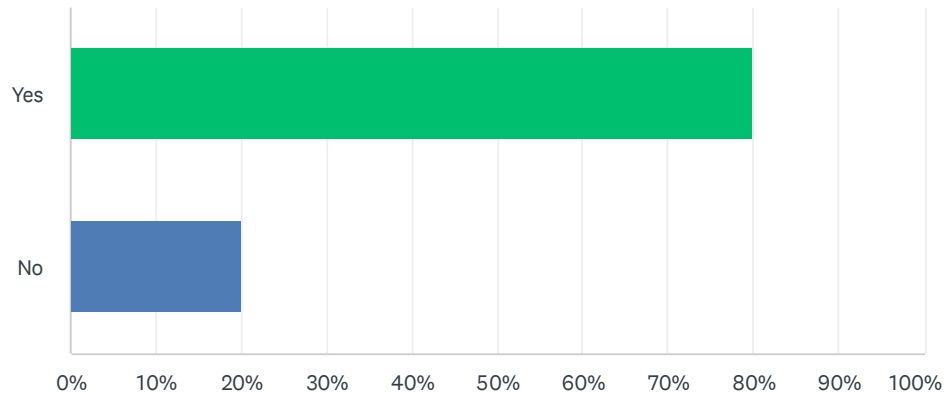
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ANSWER CHOICES	RESPONSES	
(a) Requiring the IORP to ask the member or beneficiary to choose the medium by which they would receive their PBS, with a specified default if the member/beneficiary does not reply "after reasonable efforts have been made to ascertain [their] preference".	10.00%	1
(b) Requiring the IORP to produce the PBS In digital format, with members/beneficiaries given the ability to ask for a paper copy.	90.00%	9
Total Respondents: 10		

Q9 Pensions Benefit Statements (PBS) EIOPA proposes changes to Articles 39 and 41 to impose additional requirements in relation to the disclosure to IORP members “who bear investment risk or take investment decisions” of costs and charges. Do you support these changes?

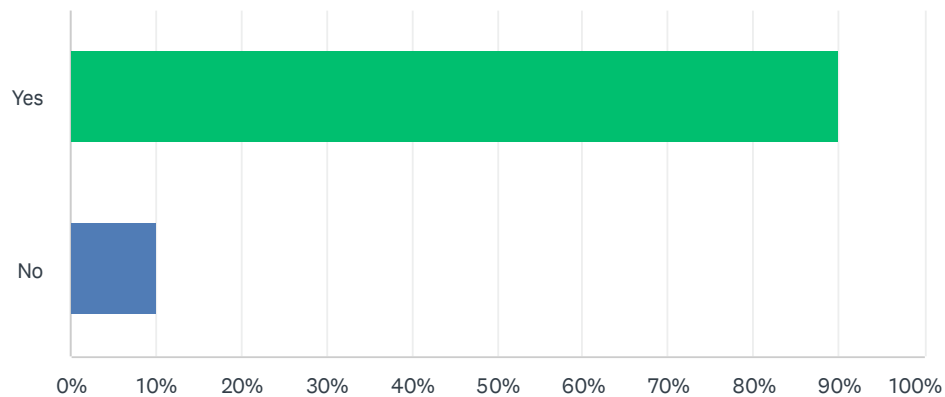
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ANSWER CHOICES	RESPONSES	
Yes	80.00%	8
No	20.00%	2
TOTAL		10

Q10 Projections EIOPA suggests showing a “favourable” scenario as well as the existing “best estimate” and “unfavourable” scenarios. Where stochastic modelling is used in the risk management of the IORP, this should be used to determine the scenarios illustrated, but there would be no requirement to use stochastic modelling otherwise. Do you agree?

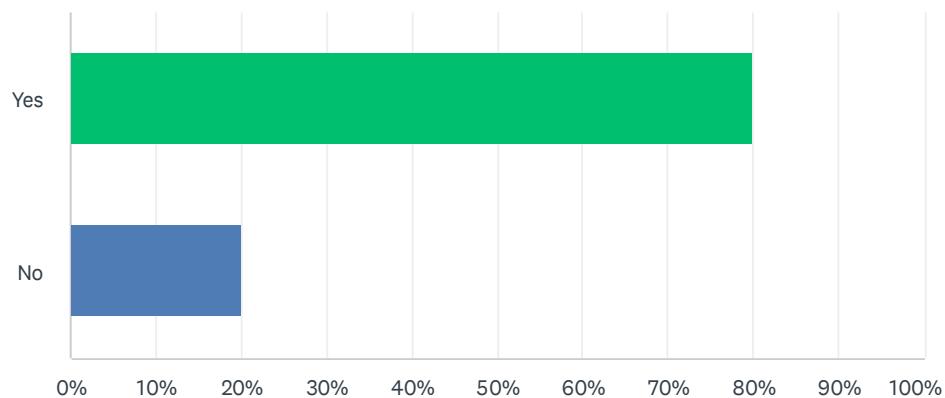
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ANSWER CHOICES	RESPONSES	
Yes	90.00%	9
No	10.00%	1
TOTAL		10

Q11 Sustainability Consideration of sustainability risks is voluntary under the current Directive. EIOPA proposes that the integration of sustainability risks in investment decisions and considerations of double materiality [i.e. the impact which the IORP's activities have on the world] should be included in the prudent person rule, similar to the requirements in Solvency II and IDD. Do you agree?

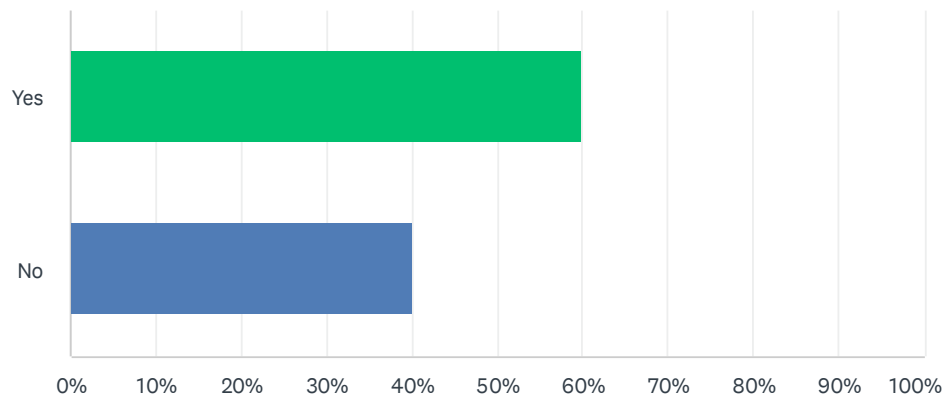
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ANSWER CHOICES	RESPONSES	
Yes	80.00%	8
No	20.00%	2
TOTAL		10

Q12 Diversity & Inclusion With a view to improving the diversity of the Boards of IORPs, EIOPA recommends a package of measures including a recruitment policy promoting diversity and inclusion, a gender-neutral remuneration policy and a target percentage for the underrepresented gender. Do you agree?

Answered: 10 Skipped: 0



ANSWER CHOICES	RESPONSES	
Yes	60.00%	6
No	40.00%	4
TOTAL		10

Q13 Is there anything else you wish to add?

Answered: 10 Skipped: 0