



PRI Reporting and Assessment survey 2010 Full Responses

Your organisation: Tradeka Corporation

Organisational overview

This section determines which questions in the survey are relevant to your organisation. Your organisation's characteristics also play a role in determining your peer group for benchmarking. Therefore, please ensure you provide accurate answers.

You will be provided with an Other category in some questions, but please only use this option if the alternative selections listed do not represent you in any way, as this may prevent you from having results comparable with peers.

You will not be able to continue the online survey until you have fully completed both this section and the 'Governance, policy and strategy' section in this respective order. However, if you wish to begin preparing your answers for the following sections you may do so by reviewing the full list of questions and explanatory notes in the manual provided on the PRI intranet.

This section may require you to collect information from multiple sources. We strongly recommend you begin collecting this information as soon as possible and before commencing the survey. For support in assembling this information, you may use the Data Collection Forms which list some mainly quantitative questions that may require greater effort to obtain. You can also download these forms on the PRI intranet.

This section of the survey is not scored.

Q 2 What category best describes your organisation?

Please select one category which best represents your primary activity. Asset owners (AOs) Other asset owner - please specify: Consumer owned co-operative

Q 6 Please indicate the number of staff your organisation employs and select the level of complexity that best describes your organisation?

Approximate number of staff: 4000

Level of complexity of organisation: Simple

Q 7 What were your organisation's total assets under management as of 31 December 2009, including the assets of all your consolidated subsidiaries?

Table with 4 columns: billions, millions, thousands, units. Row: Total AUM: 230 000 000

Currency: Euro (EUR)

Date of assets under management figure

	year	month	day
Date:	2009	December	31

The amount you indicated above is roughly equal to the amount calculated below in United States Dollars. Please confirm that this figure is approximately correct before proceeding. Exchange rates are from the International Monetary Fund.

Source: *IMF Exchange Rate archive, December 2009*

	billions	millions	thousands	units
Total AUM in USD:		331	338	056

Q 8 Please provide an approximation of your average asset mix for 2009 or your most recent count, in %.

(+/- 5 % is sufficient, the sum of all the fields must be 100 %)

Asset class	Internal active	Internal passive	External active	External passive
Listed equity (developed markets)	%	%	30 %	%
Listed equity (emerging markets)	%	%	20 %	%
Fixed income - sovereign and other non-corporate issuers	%	%	%	%
Fixed income - corporate issuers	%	%	40 %	%
Private equity	10 %	%	%	%
Listed real estate or property	%	%	%	%
Non-listed real estate or property	%	%	%	%
Hedge funds	%	%	%	%
Commodities	%	%	%	%
Infrastructure	%	%	%	%
Cash	%	%	%	%
Other - please specify:	%	%	%	%

Please contact the PRI Secretariat at assessment@unpri.org before indicating that more than 10% of your assets fall into the 'Other' category. A response of 'Other' may render the benchmarking results less useful for you and your peers.

If you manage balanced or multi-asset class products with listed equity, fixed income and potentially other asset classes, the relative assets in these funds need to be separated out into the different asset classes.

Total (must add up to 100%): 100 %

Q 9 Please provide the following information based on your asset classes holdings:

B. What percentage of your assets invested in publicly listed companies are invested in companies where your

organisation or external investment managers have significant control? Significant control implies that active ownership can influence change more so than proxy voting and engagement alone.

0 %

Q 10 What percentage of your externally managed assets are managed by PRI signatories? (+/- 5% is sufficient)

Percentage: 90 %

Governance, policy and strategy

This section is focused on the governance, policies and strategies guiding your organisation's approach to responsible investment (RI). 'Policy' in this section may refer to one overall RI policy or multiple policies that address various elements of RI or ESG issues. Some questions in this section are scored, while other questions are not scored but do determine the applicability of subsequent questions.

Please make sure you provide accurate answers. You will not be able to enter this section unless you have completed the "Organisational overview" section. You will not be able to continue the survey until you have finalised this section. However, if you wish to begin preparing your answers for the following sections, you may do so by reviewing the full list of questions and explanatory notes in the manual provided on the [PRI intranet](#). This section will be scored separately from the six Principles.

Q 11 Please provide a description of how your governance, policies and strategies address RI and ESG issues.

Note that this text - in addition to being part of the full survey - will also be part of the *Executive Summary* of the survey. The *Executive Summary* is a separate document that will collate the text you provide for each of the introductory sections of the survey (GPS and the six Principles).

Tradeka Corporation is a long-term investor. We take care that all our direct investments follow PRI principles. Most of our fund managers are PRI signatories. Those who are not we have asked to take PRI principles into consideration when taking care Tradeka Corporation funds.

Q 12 Do you have a policy or a set of policies that make specific reference to responsible investment, and if so, do they cover environmental, social, and governance issues?

Please select "Yes" or "No": Yes

If "Yes", which issue(s) does it cover? Environmental
Social

Q 13 For the following asset classes, to what extent has your policy or approach to responsible investment been incorporated into internal management processes (e.g. business planning, strategic planning, or similar)?

Extent that your approach has been incorporated into internal management processes

Please select:

"Large", "Moderate", "Small" or "Not at all"

Asset class

Listed equity (developed markets) Moderate

Listed equity (emerging markets) Moderate

Fixed income - corporate issuers Large

Private equity Large

Q 14 Among the roles within your organisation:

- Who has a clear responsibility related to responsible investment implementation?
- Whether they are incentivised and/or trained on RI/ESG considerations?

	Roles present in your organisation	Responsibilities on RI/ESG	Incentives	Training
	Please check all that apply		Please choose among "Yes, for all", "Yes, for some" or "No"	
Board of trustees or board of directors and their committees	Yes	Yes	N/A	No
Chief Executive Officer or Chief Investment Officer or equivalent	Yes	Yes	Yes, for some	Yes, for some
Other senior management	Yes			
Portfolio managers				
Analysts				
Researchers				
RI or ESG specialist				
Other - please specify:				

Q 15 Select any of the following RI, ESG and/or SRI approaches that you or your external investment managers currently apply in the investment decision making process.

Please note that this question helps determine which questions you will be asked in subsequent sections, so please carefully review the definition of each possible answer.

Please select all those that are relevant (columns are visible based on your answer to Q8 on asset classes breakdown)

Internally managed

Externally managed

Exclusion based on ethical criteria

Screening as a way to avoid the potential negative publicity surrounding the companies/sectors in question as it may adversely reflect on you or your manager's brand/license to operate



Screening based on a belief that exclusion or inclusion of certain investments from your investment universe can have a material effect on portfolio performance

ESG analysis within individual investment decisions, possibly including these factors into valuation and investment performance models



Themed investing



None of the above (this reply excludes any of the above)

Q 16 Please indicate which of the following thematic investment strategies your organisation employs?

Please select all that apply

Cleantech



Microfinance

Sustainable forestry

Global health

Water

Other (1) - please specify:

Other (2) - please specify:

Other (3) - please specify:

Other (4) - please specify:

Other (5) - please specify:

Q 17 Please select any of the following active ownership activities that you, your external service providers or your external investment managers currently undertake on behalf of your organisation?

Please note that this question helps determine which questions you will be asked in subsequent sections, so please carefully review the definition of each possible answer.

You may select any approach you or your external managers, service providers or partner entities adopt on your behalf

(Proxy) voting related to listed equity investments in the following asset classes: Listed equity (developed markets), listed equity (emerging markets), or listed real estate/property (including the votes on listed securities held in hedge funds).



File and/or co-file shareholder resolutions on listed companies.

Engagement on ESG issues with listed equity or fixed income issuers in the following asset classes: listed equity (developed markets), listed equity (emerging markets), listed real estate/property, listed securities held in hedge funds, or fixed income - corporate issuers.

Ownership and engagement activities focused on ESG issues related to investments in the following asset classes: Listed equities which permit a significant control, sovereign and other non-corporate fixed income, private equity, non listed real estate/property, hedge funds, infrastructure, or other.

None of the above (this reply excludes any of the above).

Q 18 Please add any overall comments and clarifications related to governance, policy and strategy here.

Principle 1 - We will incorporate ESG issues into investment analysis and decision-making processes.

This section focuses on the integration of ESG considerations into the investment process. The questions are split into three sections. Only questions relevant to your organisation will be displayed, based on your responses to Q 8 (your investment management structure and asset class breakdown).

The three sections are:

- I. Internally and actively managed investments;
- II. Externally and actively managed investments; and
- III. Passively (both internally and externally) managed investments.

Some questions in this section are scored. Any question that is scored, but is not relevant to your organisation, based on your investment management structure and asset class breakdown or other responses, will not affect your overall score for Principle 1.

You do not need to complete Principle 1 questions before completing questions for other Principles. While completing this section you are free to navigate to any of the other sections of the survey without losing answers already completed.

Q 19 Please provide a description of your organisation's approach to this Principle. For example, how do your organisation's investment analysis and decision-making processes incorporate ESG issues?

If your assets are managed both internally and externally, please describe how you address this in both portions of your assets. In addition, please describe any activities you may be doing to integrate ESG issues into the management of those investments that passively track indices (if you use this approach).

Note that this text - in addition to being part of the full survey - will also be part of the *Executive Summary* of the survey. The *Executive Summary* is a separate document that will collate the text you provide for each of the introductory sections of the survey (GPS and the six Principles).

We have informed all our fund managers that Tradeka Corp is a signed PRI principles and asked them to take this into consideration when taking care of our funds.

After 2011 all our funds managers should be PRI signatories

Q 20 What percentage, by asset class, of your organisation's assets under active management internally integrate the consideration of R/ESG issues in investment decision making processes - such as researching ESG information and/or constructing/managing portfolios - and to what extent?

Asset class	What percentage of assets under active management internally (see example in notes) (+/- 5 per cent is sufficient)	Research (gathering and analysing)	Portfolio construction and management
Private equity	10 %	If percentage is greater than zero, please select: "Large", "Moderate", "Small" or "Not at all"	Large

Q 21 For the assets under active management internally that integrate the consideration of RI/ESG issues, to what extent do you have a process for monitoring the capability of investment analysts, portfolio managers and other relevant investment professionals on how they integrate the consideration of RI/ESG issues into investment analysis and decision-making processes?

Monitoring

Please select:

Asset class "Large", "Moderate", "Small" or "Not at all"

Private equity Moderate

Q 22 What percentage, by asset class, of your organisation's assets under active management externally did you specify - contractually or via other agreement - that the consideration of RI/ESG issues be integrated into the investment decision-making processes of your external investment managers?

For these assets, what is the extent of integration you agreed upon and to what extent do you monitor such integration?

Asset class	Assets under active management externally (see example in notes) (+/- 5 per cent is sufficient)	Agreed RI/ESG integration Please select: "Large", "Moderate" or "Small"	Monitor Please select: "Large", "Moderate", "Small" or "Not at all"
Listed equity (developed markets)	30 %	Moderate	Moderate
Listed equity (emerging markets)	20 %	Moderate	Moderate
Fixed income - corporate issuers	50 %	Large	Moderate

Q 23 When searching for and selecting external investment managers in 2009, to what extent did your organisation consider the capabilities of external investment managers to consider RI/ESG issues?

Please select:

"Large", "Moderate", "Small" or "Not at all"

Please select: Moderate

Q 25 Please add any overall comments and clarifications related to Principle 1 here. Please also describe any significant activities relating to Principle 1 not already captured by your answers above

Principle 2 - We will be active owners and incorporate ESG issues into our ownership policies and practices.

This section is focused on active ownership and is divided into three parts. You will see only those questions relevant to your organisation.

The first part addresses voting related to listed investments. The second part addresses non-voting engagement activities undertaken by your organisation or on your behalf by third parties with listed equity and corporate fixed income issuers. For the purpose of this survey, the term 'engagement' refers to non-voting contact with companies to discuss concerns regarding ESG issues. The third part addresses ownership and engagement practices for other asset classes such as sovereign and other non-corporate fixed income issuers, private equity, non-listed real estate/property, hedge funds, and infrastructure. This third section also covers any listed equities where investors have significant control (as defined in Q9, explanatory note [B]).

The third section is necessary to account for the differing levels of influence that investors may acquire when investing in other asset classes versus those of listed equities.

The contents and parts for this section of the survey are therefore:

1. Voting and engagement activities related to listed equity investments undertaken by:
 - A. internal staff;
 - B. external parties (e.g., service providers and external managers).
2. Engagement activities related to fixed income issuers;
3. Ownership and engagement activities for sovereign and other non-corporate fixed income, private equity, non-listed real estate and property, hedge funds, and infrastructure, as well as listed equities when they represent significant control.

While completing this section you are free to move to any of the other sections of the survey without losing work already done.

Please note that for this survey, proxy voting activities entail any casting of votes at AGMs as well as the filing or co-filing of resolutions. Engagement activities refer to all interactions with investee companies that are not related to voting activities. Engagement activities should seek to achieve relevant information and promote better ESG performance by companies. Such activities usually involve written communications, phone calls and meetings with management. Working with governments to modify laws, rules and regulations in favour of ESG issues should not be counted as engagement in this part of the survey and it will be addressed separately in Principle 4 and 5.

Q 26 Please provide a description of your organisation's approach to this Principle. For example, how is your organisation an active owner and how does it incorporate ESG issues in its ownership policies and practices?

Describe both your voting activities and any other engagement activities you undertake across the different asset classes you hold.

Note that this text - in addition to being part of the full survey - will also be part of the *Executive Summary* of the survey. The *Executive Summary* is a separate document that will collate the text you provide for each of the introductory sections of the survey (GPS and the six Principles).

We participate shareholder meetings of Finnish companies when necessary and possible. We vote when it is necessary. Possibilities are limited because our investment organisation is only three persons.
We don't directly own any other than Finnish companies

Q 27 Do you have a (proxy) voting policy, and, if so, does it address environmental, social and governance (ESG) issues?

Do you have a voting policy? No

If Yes, please select all that apply:

Q 28 For listed equities, please indicate the ratio of (proxy) votes cast, either directly or via third parties (such as an external service providers or external investment manager), against those you could have cast in 2009 for at least one of the following measures:

- by ballots item or resolution;
- by meetings (e.g. AGMs, EGMs, special);
- by listed assets under management.

Please answer for at least one of these measures,
if available please provide others as well

We do not track our
listed equity voting
activities

	Ballot items	Meetings	Listed assets	
Actually cast vs. all you could have cast	%	%	%	✓

Q 29 For listed equities, who makes voting decisions on behalf of your (or your client's) organisation? Please rank the importance of the different groups listed below based on the proportion of decisions made by that group.

Please note that subsequent questions will be asked specifically on the group that you list as most important and - if specified - of the second and third most important. Only the activities of the most important will be scored.

Please select from:

"Internal investment manager or other internal staff"

"Internal voting or governance group"

"External investment manager"

"External proxy voting service"

"External service provider" or

"Other third party voting support entity"

Most important: Internal investment manager or other internal staff

Second most important:

Third most important:

Q 30 For those listed equity votes you cast:

- to what extent is information related to voting items gathered and analysed before voting decisions are made; and
- do you monitor whether voting is done in accordance with your voting instructions?

a. Information gathered and analysed

b. Monitor voting

Please select

"Large", "Moderate", "Small" or "Not at all"

Please select

"Yes, for all", "Yes, for some" or
"No, we make no effort to ensure"

Small

No, we make no effort to ensure

Q 31 Do you inform your listed equity companies of your rationale when you abstain or vote against management recommendations?

Please select one: No, we make no effort to ensure

If "Yes", please indicate how this disclosure is communicated to companies.

If answering "No", please explain why.

Our shareholding in companies is very small. Situations there are votings in Finnish shareholder meetings are very rare.

Q 34 How does your listed equity securities lending programme address voting?

Please select one: We do not have a securities lending programme

Q 35 To what extent do you and/or your agents review shareholder resolutions put forward by other shareholders to determine whether or not to support the resolution?

Please select
"Large", "Moderate", "Small", "Not at all" or
"We do not vote on shareholder resolutions"

Voting - managed internally

Small

Q 51 Please add any overall comments and clarifications related to Principle 2 here. Please also describe any significant activities relating to Principle 2 not already captured by your answers above

Principle 3 - We will seek appropriate disclosure on ESG issues by the entities in which we invest.

Principle 3 is about ensuring that information related to ESG issues is disclosed by companies and other entities in your organisation's investment universe. It is closely related to your activities on Principle 1 and Principle 2.

This section lists questions regarding:

- Who seeks ESG disclosure information for your organisation;
- The level of detail and content that is sought;
- The information you may be seeking regarding norms, standards, codes of conduct or international initiatives related to R/ESG.

While completing this section you are free to move to other sections of the survey without losing work you have already done.

Q 52 Please provide a description of your organisation's approach to this Principle. For example, how does your organisation seek appropriate disclosure on ESG issues by the entities in which it invests?

Note that this text - in addition to being part of the full survey - will also be part of the *Executive Summary* of the survey. The *Executive Summary* is a separate document that will collate the text you provide for each of the introductory sections of the survey (GPS and the six Principles).

We read ESG reports from all the companies we directly invest. Today we have about 20 companies on our portfolio. We demand that our fund managers take these issues into consideration when investing our funds.

Q 53 Who asked for and/or collected from your organisation's investee companies (or other investment entities) information about their ESG policies, practices or performance in 2009?

Please select all that apply

Internal staff



External investment manager(s)



External engagement service provider(s)

External research providers

Brokers / dealers

Other - please specify:

None of the above: Investee companies, or other investment entities, were not asked to provide information about their ESG policies, practices or performance in 2009 (please specify below why not)

If investee companies were not asked, please specify why.

Q 54 To what extent did you or your external agent(s) have a dialogue with companies (or other investment entities) regarding the production, by asset class, of standardised and/or systematic reporting about their ESG policies, practices or performance in 2009?

Please select:

"Large", "Moderate", "Small" or "Not at all"

Asset class

Listed equity (developed markets)	Small
Listed equity (emerging markets)	Small
Fixed income - corporate issuers	Small
Private equity	Large

Q 55 In which format or mechanism have you or your third party agents requested reporting on ESG policies, practices or performance?

Please select all that apply

- Integrated with regular financial reports
- Standalone corporate (social) responsibility or sustainability reports
- Global Reporting Initiative (GRI)
- Carbon Disclosure Project (CDP)
- Global Framework for Climate Risk Disclosure
- Communication on Progress (COP) by the United Nations Global Compact
- Country-level company form of the Extractive Industries Transparency Initiative (EITI)
- Submission of a tailored survey
- Other reporting framework by an industry or association - please specify:
- None of the above

Q 56 To what extent did you or your third party agents seek information from companies regarding their practices related to norms, standards, codes of conduct or international initiatives/ declarations/ conventions related to ESG issues in 2009?

Please select:
"Large", "Moderate", "Small" or "Not at all"

Please select:

Q 57 Please add any overall comments and clarifications related to Principle 3 here. Please also describe any significant activities relating to Principle 3 that are not already captured by your answers above.

Principle 4 - We will promote acceptance and implementation of the Principles within the investment industry.

Principle 4 is about promoting the acceptance and implementation of the Principles for Responsible Investment (PRI) among your clients, service providers, partners, brokers/dealers and other investment industry players. In addition, it is about working with governments, regulators and international bodies to address and define approaches relating to ESG issues.

While completing this section you are free to move to any of the other sections of the survey without losing work already done.

Q 58 Please provide a description of your organisation's approach to this Principle. For example, how does your organisation promote the acceptance and implementation of the Principles within the investment industry?

Please describe how you support the incorporation of ESG factors in the investment industry via mandates, incentives, Request for Proposals (RfPs), policy discussions etc. Please, indicate how your organisation does this in relation to clients and/or beneficiaries, peers or other entities.

Note that this text - in addition to being part of the full survey - will also be part of the *Executive Summary* of the survey. The *Executive Summary* is a separate document that will collate the text you provide for each of the introductory sections of the survey (GPS and the six Principles).

Tradeka is a consumer owned co-operative. We are an active member in Finnish investment community. We are a co-organizer in Sustainable investment 2010-seminar and a founding member at FINSIF.

Q 59 Did you include RI/ESG considerations when working with service providers and/or external investment managers in 2009 (where applicable)?

Specifically when:

- searching for service providers or external managers;
- drafting contractual agreements;
- structuring incentive schemes.

	a. Searches	b. Contracts	c. Incentives	We do not work with this type of provider
Service providers or external managers	If you work with this type of service provider, please select "Yes, for all", "Yes, for some" or "No"			
Brokers / dealers	Yes, for all	Yes, for all	Yes, for some	
External engagement service provider				✓
Investment consultant				✓
Investment research provider				✓
Proxy voting service provider				✓
External investment manager	Yes, for all	Yes, for all	Yes, for all	

Other - please specify:

Q 60 To what extent did you encourage peer organisations and/or your institutional clients to consider RI/ESG issues in 2009?

Please select:
"Large", "Moderate", "Small" or "Not at all"

Please select: Large

Q 61 Does your broker evaluation process (which determines how you allocate commissions to brokers) include an ESG component, and/or do you have a budget to pay for broker research on ESG issues?

Please select:
"Yes" or "No"

Please select: Yes

Q 62 To what extent do you identify ESG issues and suggest them to brokers or other investment research providers for research?

Please select:
"Large", "Moderate", "Small" or "Not at all"

Please select: Moderate

Q 63 To what extent did you engage in dialogue, lobbying or initiatives pertaining to government policy and/or industry regulations related to RI/ESG issues in 2009?

Please select:
"Large", "Moderate", "Small" or "Not at all"

Please select: Small

Q 64 Please add any overall comments and clarifications related to Principle 4 here. Please also describe any significant activities relating to Principle 4 not already captured by your answers above

Principle 5 - We will work together to enhance our effectiveness in implementing the Principles.

Principle 5 is about collaborating with others in your implementation of responsible investment. The questions in this section are designed to capture the many ways in which signatories collaborate (for example by using the PRI Clearinghouse), and thus may overlap with areas discussed previously in the survey. However, the focus here is only those activities that involve working with others to implement the Principles.

While completing this section you are free to move to any of the other sections of the survey without losing work already done.

Q 65 Please provide a description of your organisation's approach to this Principle. For example, how does your organisation work with other parties to enhance its implementation of the Principles?

Note that this text - in addition to being part of the full survey - will also be part of the *Executive Summary* of the survey. The *Executive Summary* is a separate document that will collate the text you provide for each of the introductory sections of the survey (GPS and the six Principles).

Tradeka Corp. is actively encouraging all Finnish investors and service providers to sign PRI principles.

Q 66 To what extent did you collaborate with other investors in regard to the Principles, and what Principle did you collaborate most on?

Extent of Collaboration	Principle you collaborated most in
Please select: "Large", "Moderate", "Small" or "Not at all"	Please select: Principle 1, 2, 3, 4 or 6
Small	Principle 4

Q 67 Did you log in to the PRI Engagement Clearinghouse in 2009 and if so, how did you use it?

Logged in?	If Yes, please select all that apply
No	

Q 68 Did your organisation participate in any RI/ESG-issue related associations?

Among those you did participate in, please select:

- the first, second and third most important to your organisation, and
- for the three most important, to what extent your organisation participated.

For those not listed, please use the 'Other' field.

Associations	Please select all that apply	Please select only one "Most important", one "Second most important" and one "Third most important"	Only for these three most important, please select to what extent: "Large", "Moderate" or "Small"
No, we did not participate in any RI/ESG-issue related associations	<input checked="" type="checkbox"/>		

Q 69 Please add any overall comments and clarifications related to Principle 5 here. Please also describe any significant activities relating to Principle 5 not already captured by your answers above

Principle 6 - We will each report on our activities and progress towards implementing the Principles.

Principle 6 is about your organisation's reporting of responsible investment activities (as opposed to Principle 3 which relates to the reporting of your investees or potential investees). The questions in this section focus on how you disclose your activities regarding the implementation of the Principles and where that disclosed information can be found. While completing this section you are free to move to any of the other sections of the survey without losing work already done.

Q 70 Please provide a description of your organisation's approach to this Principle. For example, in what ways does your organisation report your implementation of the Principles? Please include any sort of disclosure and transparency practices you have adopted.

Note that this text - in addition to being part of the full survey - will also be part of the *Executive Summary* of the survey. The *Executive Summary* is a separate document that will collate the text you provide for each of the introductory sections of the survey (GPS and the six Principles).

Reporting is a part of Tradeka+s yearly reporting.

Q 71 To what extent did you disclose, either to clients/beneficiaries or publicly, your policy and/or approach to incorporating ESG issues into investment analysis and decision-making processes in 2009?

Please select:
"Large", "Moderate", "Small" or "Not at all"

Small

If you disclosed, please indicate how this disclosure can be obtained - a web address (URL) would be sufficient. If answering *not at all*, please explain why not.

Yes, you did disclose: www.tradeka-yhtyma.fi
how can it be obtained

Did not disclose publicly:
please explain why not

Q 72 Did you disclose your voting policy in 2009?

Please select one: No

If 'Yes, disclosed publicly', please indicate how it can be obtained - a URL would be sufficient. If not, please explain why not.

Yes, disclosed publicly:
how can it be obtained

Did not disclose publicly: We vote at shareholder meetings when its necessary. We don+t have a public voting policy.
please explain why not

Q 73 Did you disclose your (proxy) voting record in 2009, and if so:

- How much of your voting record did you disclose?
- Did you disclose the explanations/reasons for voting as you did?
- How frequently did you disclose?

Did you disclose?
(please select one)

How much of your voting
(please select one)

How much explanation?
(please select one)

How frequently?
(please select any applicable)

No

If 'Yes, disclosed publicly', please indicate how it can be obtained - a URL would be sufficient. If not, please explain why not.

*Yes, disclosed publicly:
how can it be obtained*

*Did not disclose publicly:
please explain why not* There were votings only at two of those meetings we attended.

Q 76 Did you disclose (either to clients/beneficiaries or publicly) RI/ESG activities, results and progress related to Principle 3, Principle 4 or Principle 5 in 2009?

Please select "Yes, disclosed publicly", "Yes - disclosed to clients or beneficiaries only" or "Not at all"

Principle 3

Yes - disclosed publicly

If 'Yes, disclosed publicly', please indicate how it can be obtained - a URL would be sufficient. If not, please explain why not.

*Yes, disclosed publicly:
how can it be obtained* www.tradeka-yhtyma.fi

*Did not disclose publicly:
please explain why not*

Please select "Yes, disclosed publicly", "Yes - disclosed to clients or beneficiaries only" or "Not at all"

Principle 4

Yes - disclosed publicly

If 'Yes, disclosed publicly', please indicate how it can be obtained - a URL would be sufficient. If not, please explain why not.

*Yes, disclosed publicly:
how can it be obtained* www.tradeka-yhtyma.fi

*Did not disclose publicly:
please explain why not*

Please select "Yes, disclosed publicly", "Yes - disclosed to clients or beneficiaries only" or "Not at all"

Principle 5

Yes - disclosed publicly

If 'Yes, disclosed publicly', please indicate how it can be obtained - a URL would be sufficient. If not, please explain why not.

*Yes, disclosed publicly:
how can it be obtained* www.tradeka-yhtyma.fi

*Did not disclose publicly:
please explain why not*

Q 77 Please add any overall comments and clarifications related to Principle 6 here. Please also describe any significant activities relating to Principle 6 not already captured by your answers above
