



# PRI REPORTING FRAMEWORK 2019 – SERVICE PROVIDERS Strategy and Governance (SG)

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2018

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## Understanding this document

In addition to the detailed indicator text and selection options, in each module of the PRI Reporting Framework, you can find information that will help you to identify which indicators are relevant for your organisation.

### Top bar

Key information about each indicator is highlighted in the top bar, including the indicator status (mandatory or voluntary) and the purpose of the indicator.

xxx 01	Indicator status <b>MANDATORY</b>	Purpose <b>GATEWAY</b>
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### Indicator status

<b>MANDATORY</b>	Mandatory indicators reflect core practices. These responses will be made public and must be completed to submit the framework.
<b>MANDATORY TO REPORT VOLUNTARY TO DISCLOSE</b>	Some indicators are mandatory to complete but voluntary to disclose. These indicators may determine which subsequent indicators are applicable or are used for peering, but they may also contain commercially sensitive information.
<b>VOLUNTARY</b>	Voluntary indicators reflect alternative or advanced practices. These indicators are voluntary to report and disclose.

### Purpose

Gateway		The responses to this indicator 'unlock' other indicators within a module if they are relevant for your organisation. Please refer to the logic box for more information.
Descriptive		These are open-ended narrative indicators that allow you to describe your activities.

### Underneath the indicator

Underneath the indicator, you can find the explanatory notes and definitions that contain important information on interpreting and completing the indicators. Read the logic box to make sure an indicator is applicable to you.

xxx 01	<b>EXPLANATORY NOTES</b>
xxx 01.1	This provides guidance on how to interpret the sub-indicators, including examples of what could be reported.
xxx 01.2	
<b>LOGIC</b>	
xxx 01	This explains when this indicator is applicable and/or if it has an impact on subsequent indicators. If there is no logic box, the indicator is always applicable and does not affect other indicators.

xxx 01	<b>DEFINITIONS</b>
xxx 01	Specific terms that are used in the indicator are defined here.

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## Pathways through the module



## Preface

The information reported in this module will enable your stakeholders to understand your organisation's approach to responsible investment and ESG services (i.e. your governance; policies that cover your approach; how you apply, promote, and advance the Principles; and how you take into account long term risks). You can also report on how you interact with clients and incorporate feedback.

## Summary of updates

Indicator 2018	Update
SG 01	Sub-indicator amended and merged with previous indicator SG 02.
SG 02	Removed.
SG 03	Renumbered and options added and/or removed.
SG 04, 07–08, 10–11, 14–15	Renumbered
SG 05	Renumbered and sub-indicators and options reworded and/or added
SG 06	Renumbered and option reworded
SG 09	Renumbered and option added
SG 12-13	Renumbered and reworded

For a detailed description of changes, please see [here](#).

## SECTION

## Policy on ESG beliefs

SG 01	Indicator status MANDATORY	Purpose GATEWAY
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SG 01	INDICATOR		
SG 01.1	Describe how your organisation's philosophy incorporates environmental, social and governance factors, and the link to your business offerings.		
SG 01.2	Indicate whether you have policies that formalise the incorporation of your ESG beliefs in your business offerings.		
	<input type="radio"/> Yes	<input type="radio"/> No	
SG 01.3	Indicate the components/types of your internal policy and provide the URL and/or an attachment of the document/s if they are publicly available.		
	<b>Policy components/types</b>	<b>URL</b>	<b>Attachment</b>
	<input type="checkbox"/> [a] Policy setting out your overall ESG/RI approach		
	<input type="checkbox"/> [b] Formalised guidelines on environmental factors		
	<input type="checkbox"/> [c] Formalised guidelines on social factors		
	<input type="checkbox"/> [d] Formalised guidelines on corporate governance factors		
	<input type="checkbox"/> [e] Formalised guidelines on engagement approach		
	<input type="checkbox"/> [f] Formalised guidelines on (proxy) voting approach		
	<input type="checkbox"/> [g] Other, specify (1) _____		
	<input type="checkbox"/> [h] Other, specify (2) _____		
	<input type="radio"/> None of the above		
SG 01.4	Indicate how these are put into practice internally across the organisation.		
	<input type="checkbox"/> Regular employee training on RI/ESG <input type="checkbox"/> Regular RI/ESG policy awareness building for employees <input type="checkbox"/> Establishment of policy review committee/team <input type="checkbox"/> Remuneration linked to achieving ESG objectives <input type="checkbox"/> Annual performance incentives <input type="checkbox"/> Other, specify (1) _____ <input type="checkbox"/> Other, specify (2) _____ <input type="checkbox"/> Other, specify (3) _____		

<b>SG 01.5</b>	Additional information <a href="#">[OPTIONAL]</a>
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SG 01	EXPLANATORY NOTES
<b>SG 01.1</b>	<p>State here your organisational commitment to RI/ ESG and how this influences your business model. You can include a link to a public website or documents that explain further.</p> <p>To find out more on how your peers have responded on this practice, view our analysis and visualisation in the <a href="#">service provider interactive snapshot report</a> available on the Data Portal and the PRI website.</p>
<b>SG 01.3</b>	<p>Policy here refers to an overall statement of how you approach responsible investment, or ESG issues, in your activities. Such a policy will normally address a broad range of issues and outline the activities an organisation undertakes to address them. Whether or not you have such an overall policy, you may have guidelines on ESG or responsible investment issues within other policies (e.g. on specific issues such as corporate governance or climate change; on specific activities such as voting).</p> <p>This section does not focus on policies covering office or operational management (e.g., recycling).</p> <p><i>Policy components/types</i></p> <p>The policies listed here may be contained in a single document or multiple separate documents. You may therefore be able to tick multiple boxes.</p> <p>To find out more on how your peers have responded on this practice, view our analysis and visualisation in the <a href="#">service provider interactive snapshot report</a> available on the Data Portal and the PRI website.</p>
<b>SG 01.5</b>	<p>If your policy on your ESG approach to your business and services, other responsible investment-related policies, or guidance documents are not publicly available, you may indicate whether you plan to publish them in the future or why you do not intend to do so.</p>
<b>LOGIC</b>	
<b>SG 01</b>	<p>SG 01.3 – 01.4 will be applicable if you report “Yes” in SG 01.2.</p> <p>SG 02 will be applicable if you report ‘Yes’ in SG 01.2.</p>

SG 01	DEFINITIONS
<b>Guidelines and policy</b>	<p>The term “policy” or ‘guidelines’ in this section may refer to a single policy document that is applied across an organisation, or to a group of documents that, together, define an ESG approach to your business and services.</p>

SG 02	Indicator status <b>MANDATORY</b>	Purpose <b>DESCRIPTIVE</b>
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SG 02	INDICATOR
<b>SG 02.1</b>	<p>Indicate what frameworks and guidelines you have used to develop your organisation's policies. Tick all that apply.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> UN Principles for Responsible Investment</li> <li><input type="checkbox"/> UN Global Compact Principles</li> <li><input type="checkbox"/> UN Guiding Principles on Business and Human Rights</li> <li><input type="checkbox"/> Universal Declaration of Human Rights</li> <li><input type="checkbox"/> UN Sustainable Development Goals</li> <li><input type="checkbox"/> International Bill of Human Rights</li> <li><input type="checkbox"/> International Labour Organisation Conventions</li> <li><input type="checkbox"/> IFC Performance Standards</li> <li><input type="checkbox"/> United Nations Convention Against Corruption</li> <li><input type="checkbox"/> OECD Principles of Corporate Governance</li> <li><input type="checkbox"/> OECD Guidelines for Multinational Enterprises</li> <li><input type="checkbox"/> GRI standards</li> <li><input type="checkbox"/> Other, specify (1) _____</li> <li><input type="checkbox"/> Other, specify (2) _____</li> <li><input type="checkbox"/> Other, specify (3) _____</li> <li><input type="radio"/> None of the above</li> </ul>
<b>SG 02.2</b>	<p>Additional information. [OPTIONAL]</p>

SG 02	EXPLANATORY NOTES
<b>SG 02.1</b>	<p>This indicator focuses on the types of international norms that were used to develop your policy.</p> <p>To find out more on how your peers have responded on this practice, view our analysis and visualisation in the <a href="#">service provider interactive snapshot report</a> available on the Data Portal and the PRI website.</p>

SG 03	Indicator status <b>MANDATORY</b>	Purpose <b>DESCRIPTIVE</b>
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SG 03	INDICATOR		
<b>SG 03.1</b>	Indicate whether you offer standard, off the shelf, policies to clients as part of your product offerings, and/or whether you create tailored versions for individual clients.		
		Off the shelf	Tailored
	Asset class-specific RI guidelines	<input type="checkbox"/>	<input type="checkbox"/>
	Sector-specific RI guidelines	<input type="checkbox"/>	<input type="checkbox"/>
	Screening/exclusions policy	<input type="checkbox"/>	<input type="checkbox"/>
	Engagement policy	<input type="checkbox"/>	<input type="checkbox"/>
	(Proxy) voting policy	<input type="checkbox"/>	<input type="checkbox"/>
	RI guidelines set out within the Investment Policy Statement (IPS)	<input type="checkbox"/>	<input type="checkbox"/>
	RI guidelines set out in a freestanding RI policy	<input type="checkbox"/>	<input type="checkbox"/>
	Multi-year RI implementation project plan	<input type="checkbox"/>	<input type="checkbox"/>
	Conflict of interest management policy	<input type="checkbox"/>	<input type="checkbox"/>
	Stockbroker allocation policy	<input type="checkbox"/>	<input type="checkbox"/>
	Securities lending policy	<input type="checkbox"/>	<input type="checkbox"/>
	Other, please specify (1)_____	<input type="checkbox"/>	<input type="checkbox"/>
	Other, please specify (2)_____	<input type="checkbox"/>	<input type="checkbox"/>
	Other, please specify (3)_____	<input type="checkbox"/>	<input type="checkbox"/>
<input type="radio"/> None of the above			
<b>SG 03.2</b>	Provide a brief description of the key elements, any variations, or exceptions applying to these policies.		
<b>SG 03.3</b>	Additional information <b>[OPTIONAL]</b>		

SG 03	EXPLANATORY NOTES
SG 03.2	<p>You may wish to comment on:</p> <ul style="list-style-type: none"> <li>• the typical scope of the policies;</li> <li>• how frequently it is reviewed by the client;</li> <li>• any significant exceptions to the policies;</li> <li>• how the policies are typically implemented by the clients.</li> </ul>
<b>LOGIC</b>	
SG 03	SG 03.2 will be applicable if you report on any of the options listed in SG 03.1, except for 'None of the above'.

SG 04	Indicator status <b>MANDATORY</b>	Purpose <b>DESCRIPTIVE</b>
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SG 04	INDICATOR		
<b>SG 04.1</b>	Briefly describe how you include ESG/RI factors as part of your business offerings.		
	<b>Business area</b>	<b>How you incorporate ESG/RI factors</b>	
	[a] Reporting	(Max 250)	
	[b] Active Ownership Services		
	[c] Investment Consultancy		
	[d] Research and Data Provision		
	[e] Other, specify (1) _____		
	[f] Other, specify (2) _____		
	[g] Other, specify (3) _____		
[h] Other, specify (4) _____			
<b>SG 04.2</b>	Indicate the roles in your organisation, and indicate for each whether they have oversight and/or implementation responsibilities for ESG/RI within the organisation .		
	<b>Roles present in your organisation</b>	<b>Oversight/accountability for ESG/RI</b>	<b>Implementation of ESG/RI</b>
	Board	<input type="checkbox"/>	<input type="checkbox"/>
	Directors	<input type="checkbox"/>	<input type="checkbox"/>
	Chief Executive Officer (CEO), Chief Financial Officer (CFO)	<input type="checkbox"/>	<input type="checkbox"/>
	Chief Operating Officer (COO), Chief Information Officer (CIO)	<input type="checkbox"/>	<input type="checkbox"/>
	Other chief-level staff, specify _____	<input type="checkbox"/>	<input type="checkbox"/>
	Other heads of department, specify _____	<input type="checkbox"/>	<input type="checkbox"/>
	Dedicated ESG/RI staff	<input type="checkbox"/>	<input type="checkbox"/>
	Other role, specify (1) _____	<input type="checkbox"/>	<input type="checkbox"/>
	Other role, specify (2) _____	<input type="checkbox"/>	<input type="checkbox"/>
	Other role, specify (3) _____	<input type="checkbox"/>	<input type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	
<b>SG 04.3</b>	Indicate how you ensure ESG/RI expertise for the roles where there are RI oversight/accountability or implementation responsibilities.		

	<input type="checkbox"/> Staff training on ESG/RI incorporation
	<input type="checkbox"/> Including ESG/RI knowledge factors in personal development goals
	<input type="checkbox"/> Having development plans that aim to enhance ESG/RI knowledge of certain departments/teams/individuals
	<input type="checkbox"/> Including ESG in selection requirements when hiring new employees
	<input type="checkbox"/> Other, specify (1)_____
	<input type="checkbox"/> Other, specify (2)_____
	<input type="checkbox"/> Other, specify (3)_____
	<input type="checkbox"/> Other, specify (4)_____
SG 04.4	Indicate whether your organisation has any ESG/RI linked incentives for its employees.
	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not applicable, we ensure that employees incorporate ESG/RI into services through other mechanisms
SG 04.5	Describe the ESG/RI linked incentives.
SG 04.6	Describe how you ensure that your employees incorporate ESG/RI into services through other mechanisms than ESG/RI linked incentives.
SG 04.7	Additional information [OPTIONAL]

SG 04	EXPLANATORY NOTES
SG 04.1	Organisations may take a different approach to the inclusion of ESG and RI factors when they are an underlying part of their offerings, as compared to an ESG supplementary product. This indicator allows you to briefly describe the approach of your organisation.
SG 04.2	<p>Oversight and implementation are differentiated as follows.</p> <p>Individuals with <b>oversight</b> roles are those with management or governance responsibility for ensuring that the organisation implements its policies and achieves its objectives and targets in relation to RI/ESG performance.</p> <p>Individuals with <b>implementation</b> roles are those charged with implementing specific aspects of the organisation's RI/ESG practices, for example, conducting ESG-related research, incorporating ESG issues into asset allocation advice, voting recommendations and engagement prioritization.</p>

<b>SG 04.4</b>	<p>ESG/RI linked incentives might be monetary, recognition or exposure, and can be applicable for a number of areas, e.g. ensuring policy implementation, compensation linked to investment manager performance and similar.</p> <p>You may wish to specify whether there is a different approach to ESG/RI-linked incentives for employees working with ESG integrated products compared to ESG supplementary products.</p>
<b>LOGIC</b>	
<b>SG 04.1</b>	The options (business areas) available to you in this table depend on the information you reported in OO 05.1
<b>SG 04.2</b>	Selecting any of the options in SG 04.2, except for 'None of the above', will unlock SG 04.3.
<b>SG 04.4</b>	Selecting 'Yes' will unlock SG 04.5. Selecting 'Not applicable, we ensure that employees incorporate ESG/RI into services through other mechanisms' will unlock SG 04.6

SG 05	Indicator status <b>MANDATORY TO REPORT, VOLUNTARY TO DISCLOSE</b>	Purpose <b>DESCRIPTIVE</b>
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SG 05	INDICATOR	
<b>SG 05.1</b>	Indicate whether you outsource some of your services. Report percentage of services outsourced as percentage for that specific business area.	
	<b>Business area</b>	<b>Percentage of service outsourced</b>
	<input type="checkbox"/> Reporting	[Dropdown – broad ranges]%
	<input type="checkbox"/> Active Ownership Services	%
	<input type="checkbox"/> Investment Consultancy	%
	<input type="checkbox"/> Research and Data Provision	%
	<input type="checkbox"/> Other, specify (1)_____	%
	<input type="checkbox"/> Other, specify (2)_____	%
	<input type="checkbox"/> Other, specify (3)_____	%
	<input type="radio"/> None of the above	
<b>SG 05.2</b>	For each business area, describe what components you outsource to other organisations.	
<b>SG 05.3</b>	For each business area, describe how you ensure the organisation implementing your outsourced services adheres to your beliefs and policies on ESG/RI.	

SG 05	EXPLANATORY NOTES
<b>SG 05</b>	<p>Any form of collaboration with external partners where the external partner receives payment from your organisation for the execution of services or advice on behalf of your organisation should be reported here as outsourced services.</p> <p>The outsourced services can be enlisted for additional revenue on an ad-hoc basis, but can also include regular/permanent outsourcing of services that may not necessarily result in an explicit addition to revenue. As an example, a client might request an analysis of a portfolio's carbon footprint, at which point your organisation might outsource this analysis to an emissions analyst for the additional expertise. Your organisation might also have certain aspects such as outsourcing of data from external data providers in order to perform research and analysis themselves.</p> <p>This indicator allows you to describe how you ensure consistency throughout your services in terms of ESG/RI beliefs and adherence to any formalized policies on ESG/RI that you might have.</p> <p>To find out more on how your peers have responded on this practice, view our analysis and visualisation in the <a href="#">service provider interactive snapshot report</a> available on the Data Portal and the PRI website.</p>
<b>LOGIC</b>	
<b>SG 05.1</b>	If you report that any percentage >0% of your services are outsourced, SG 05.2 and 05.3 will be applicable to you.

<b>SG 06</b>	Indicator status <b>MANDATORY</b>	Purpose <b>DESCRIPTIVE</b>
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<b>SG 06</b>	<b>INDICATOR</b>
<b>SG 06.1</b>	<p>Indicate whether you provide training/educational services on ESG/RI. Tick all that apply.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Board/trustee training</li> <li><input type="checkbox"/> Investment manager training</li> <li><input type="checkbox"/> Regulatory bodies/authorities or public policy makers</li> <li><input type="checkbox"/> Corporate executive training</li> <li><input type="checkbox"/> ESG analyst training</li> <li><input type="checkbox"/> Other, specify (1)_____</li> <li><input type="checkbox"/> Other, specify (2)_____</li> <li><input type="checkbox"/> Other, specify (3)_____</li> <li><input type="checkbox"/> Other, specify (4)_____</li> <li><input type="radio"/> None of the above</li> </ul>
<b>SG 06.2</b>	Describe the main components of your training/educational services on ESG/RI and any variations depending on the group you provide training/education to.
<b>SG 06.3</b>	Describe whether these training/educational services include any commercial elements.
<b>SG 06.4</b>	Additional information [OPTIONAL]

<b>SG 06</b>	<b>EXPLANATORY NOTES</b>
<b>SG 06.3</b>	Use this indicator to describe to what extent you include information about your other service offerings as part of the training/educational sessions.
<b>LOGIC</b>	
<b>SG 06.1</b>	SG 06.2 and SG 06.3 will be applicable if you reported that you provide training/educational services to any of the groups listed in SG 06.1, including 'Other, specify'.

<b>SG 07</b>	Indicator status <b>MANDATORY</b>	Purpose <b>DESCRIPTIVE</b>
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<b>SG 07</b>	<b>INDICATOR</b>
<b>SG 07.1</b>	Describe how your organisation applies, advances and promotes the PRI Principles.
<b>SG 07.2</b>	Highlight whether there are any ways that your organisation would like to engage further with the PRI. [OPTIONAL]

<b>SG 07</b>	<b>EXPLANATORY NOTES</b>
<b>SG 07</b>	Use this indicator to describe where you are specifically promoting the PRI Principles through your work and other activities. You may list the specific events, publications, and other actions you undertook during the reporting year to explicitly apply, advance, and promote the PRI Principles. Advancement of general RI and ESG practices can be described in the subsequent indicator.

<b>SG 08</b>	Indicator status <b>MANDATORY</b>	Purpose
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<b>SG 08</b>	<b>INDICATOR</b>
<b>SG 08.1</b>	<p>Indicate which of the following actions your organisation has taken to promote responsible investments during the reporting year, independently of collaborative initiatives.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Provided or supported education or training programmes for clients, investment managers, legal advisers or other investment organisations</li> <li><input type="checkbox"/> Provided financial support for academic or industry research on responsible investment</li> <li><input type="checkbox"/> Encouraged better transparency and disclosure of responsible investment practices across the investment industry</li> <li><input type="checkbox"/> Spoken publicly at events and conferences to promote responsible investment</li> <li><input type="checkbox"/> Written and published in-house research papers on responsible investment</li> <li><input type="checkbox"/> Encouraged the adoption of the PRI</li> <li><input type="checkbox"/> Written and published articles on responsible investment in the media</li> <li><input type="checkbox"/> Policy engagements and other interactions</li> <li><input type="checkbox"/> Other, specify _____</li> <li><input type="radio"/> None of the above</li> </ul>
<b>SG 08.2</b>	<p>Additional information.</p> <p>[OPTIONAL]</p>

<b>SG 08</b>	<b>EXPLANATORY NOTES</b>
<b>SG 08</b>	Describe any activities that help contribute to the wider understanding of RI or ESG issues, including pro bono work, training or thought leadership activities that your organisation undertakes.

<b>SG 09</b>	Indicator status <b>MANDATORY</b>	Purpose <b>DESCRIPTIVE</b>
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<b>SG 09</b>	<b>INDICATOR</b>
<b>SG 09.1</b>	<p>Indicate which of the following long-term trends are addressed in your product outputs.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Changing demographics</li> <li><input type="checkbox"/> Climate change</li> <li><input type="checkbox"/> Resource scarcity</li> <li><input type="checkbox"/> Technology developments</li> <li><input type="checkbox"/> Other, specify (1) _____</li> <li><input type="checkbox"/> Other, specify (2) _____</li> <li><input type="radio"/> None of the above</li> </ul>
<b>SG 09.2</b>	<p>Explain how this long-term trend affects your product outputs.</p>
<b>SG 09.3</b>	<p>If none of the above are applicable, please explain why not.</p>

<b>SG 09</b>	<b>EXPLANATORY NOTES</b>
<b>SG 09.1</b>	<p>This indicator gives you the opportunity to report on long term ESG trends that your organisation is considering as part of your overall approach to ESG and/or responsible investment. The list of trends is not exhaustive and it is expected that signatories will provide examples of additional trends that are not currently captured. PRI will continue to monitor and update the list in future years.</p>
<b>SG 09.2</b>	<p>The terms used are broad and may impact business and investment processes in a number of different ways. Please provide detail on how these trends will impact your approach in terms of your product outputs.</p>
<b>LOGIC</b>	
<b>SG 09.1</b>	<p>SG 09.2 will be applicable if you report that you address any of the long term trends in your product outputs, this includes 'Other, specify____'.</p> <p>SG 09.3 will be applicable if you report 'None of the above'.</p>

<b>SG 10</b>	Indicator status <b>MANDATORY</b>	Purpose
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<b>SG 10</b>	<b>INDICATOR</b>	
<b>SG 10.1</b>	Indicate whether you interact with asset owner clients.	
	<input type="radio"/> Yes, we do	<input type="radio"/> No, we do not
	Indicate the typical frequency and type of interactions with your asset owner clients.	
	Type of interaction	Frequency
<b>SG 10.2</b>	<input type="checkbox"/> Board of trustee meetings	[DROPDOWN] Daily, Weekly, Monthly, Quarterly, Bi-annually, Annually, Ad-hoc basis, Other, specify (1)____,
	<input type="checkbox"/> Investment committee meetings	[same as above]
	<input type="checkbox"/> Trustee training workshops	
	<input type="checkbox"/> Formal regular meetings outside of committee meetings	
	<input type="checkbox"/> Informal meetings or calls	
	<input type="checkbox"/> Other, specify (1) _____	
	<input type="checkbox"/> Other, specify (2) _____	
	<input type="checkbox"/> Other, specify (3) _____	
<b>SG 10.3</b>	Additional information [OPTIONAL]	

<b>SG 10</b>	<b>EXPLANATORY NOTES</b>
<b>SG 10</b>	<p>This indicator is asking about your typical interactions with asset owner clients, <u>not</u> the investment managers you might be researching for your clients.</p> <p>This indicator will in part help PRI understand the relationship between service providers and their asset owner clients, the intensity of that relationship and they type of interaction they have to ensure clients are well informed of their services.</p> <p>Investor client interactions, frequency and topics may sometimes vary. Please report your typical approach.</p> <p>‘Interaction’ is taken to mean meetings or calls where substantive issues are discussed. It does not mean monitoring items such as reporting.</p>

	To find out more on how your peers have responded on this practice, view our analysis and visualisation in the <a href="#">service provider interactive snapshot report</a> available on the Data Portal and the PRI website.
<b>SG 10.2</b>	The information you report here is understood as the typical approach to a type of interaction and frequency of interaction that. Some level of generalization and aggregation of information may be needed to respond to this indicator.
<b>SG 10.3</b>	You may wish to describe the subject areas that you address in your interactions with asset owner clients. These may include, but are not limited to: RI-policy incorporation, how ESG affects the investment strategy, ESG integration, how ESG affects valuations, engagement and (proxy) voting, conflicts of interest, ESG risks, research on RI topics, ESG ratings, etc.
<b>LOGIC</b>	
<b>SG 10.2</b>	SG 10.2 will be applicable if you report 'Yes, we do' in SG 10.1

<b>SG 11</b>	Indicator status <b>MANDATORY</b>	Purpose <b>DESCRIPTIVE</b>
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<b>SG 11</b>	<b>INDICATOR</b>
<b>SG 11.1</b>	<p>Describe how you typically align your organisation's philosophy and approach to ESG/RI with your investor clients' goals.</p> <hr/> <p><input type="radio"/> This is not relevant for my organisation</p>
<b>SG 11.2</b>	<p>Additional information.</p> <p>[OPTIONAL]</p>

<b>SG 11</b>	<b>EXPLANATORY NOTES</b>
<b>SG 11</b>	<p>This indicator allows you to elaborate on how your organisation adapts its approach and execution of ESG services according to the investment goals or other needs of investor clients.</p> <p>Investor goals may be general such as generating superior, risk-adjusted returns or being an active owner, channelling capital towards positive impact investment opportunities and/or contributing to the sustainability of the financial markets.</p> <p>Actions to align your organisation's philosophy on and approach to ESG with investor goals may include, but are not limited to: compiling an RI/ESG value or belief statement, setting RI outcomes to be achieved over time, setting timelines for RI outcomes, documenting RI outcomes, timelines and guidelines, and RI/ESG training when beliefs and outcomes diverge.</p> <p>If this indicator is not applicable to your organisation, please explain why not by using the 'Additional information' box.</p>

<b>SG 12</b>	Indicator status <b>MANDATORY</b>	Purpose <b>DESCRIPTIVE</b>
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<b>SG 12</b>	<b>INDICATOR</b>
<b>SG 12.1</b>	<p>Describe what steps you take, if any, when your ESG recommendations are not in line with your investor clients' goals.</p> <p><input type="radio"/> This is not relevant for my organisation</p>
<b>SG 12.2</b>	<p>Additional information. [OPTIONAL]</p>

<b>SG 12</b>	<b>EXPLANATORY NOTES</b>
<b>SG 12.1</b>	<p>Describe if you take any actions to re-align your ESG recommendations with your client's goals, either by modifying your approach or by providing the investor with further information to assist with decision making.</p> <p>If this indicator is not applicable for your organisation, please explain why not by using the 'Additional information' box.</p>

<b>SG 13</b>	Indicator status <b>MANDATORY</b>	Purpose <b>DESCRIPTIVE</b>
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<b>SG 13</b>	<b>INDICATOR</b>
<b>SG 13.1</b>	Indicate whether you seek feedback from clients on your RI/ESG services and product offerings.  <div style="display: flex; justify-content: space-around;"> <span><input type="radio"/> Yes</span> <span><input type="radio"/> No</span> </div>
<b>SG 13.2</b>	Describe how you use this feedback in your RI/ESG services and product offerings.  <div style="border: 1px solid #ccc; height: 40px;"></div>
<b>SG 13.3</b>	If not, please explain why.  <div style="border: 1px solid #ccc; height: 40px;"></div>

<b>SG 13</b>	<b>EXPLANATORY NOTES</b>
<b>SG 13</b>	It may be possible to ask clients to comment on the utility of the work carried out for them, in order to understand and potentially make changes to product and service offerings. This might not always be possible or appropriate in the client relationship.
<b>LOGIC</b>	
<b>SG 13.1</b>	SG 13.2 will be applicable if you report 'Yes'. SG 13.3 will be applicable if you report 'No'.

<b>SG 14</b>	Indicator status <b>MANDATORY</b>	Purpose <b>DESCRIPTIVE</b>
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<b>SG 14</b>	<b>INDICATOR</b>
<b>SG 14.1</b>	Indicate whether your organisation has a policy for managing potential conflicts of interest.  <div style="display: flex; justify-content: space-around;"> <span><input type="radio"/> Yes</span> <span><input type="radio"/> No</span> </div>
<b>SG 14.2</b>	Describe how you manage potential conflicts of interest.
<b>SG 14.3</b>	Describe how you ensure that company employees do not derive any personal gain from the use of information collected during your work process.
<b>SG 14.4</b>	Additional information [OPTIONAL]

<b>SG 14</b>	<b>EXPLANATORY NOTES</b>
<b>SG 14</b>	A conflict of interest may occur where the interest of a client is not the same as, or is not perceived to be the same as, that of your own organisation.
<b>LOGIC</b>	
<b>SG 14.1</b>	SG 14.2 and 14.3 will be applicable if you report 'Yes' in SG 14.1.