PRI REPORTING FRAMEWORK 2019
Organisational Overview

November 2018

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UNEP Finance Initiative
Changing finance, financing change

United Nations Global Compact

An investor initiative in partnership with UNEP Finance Initiative and UN Global Compact

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 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), the purpose of the indicator, and which PRI Principle it relates to.

	Indicator status	Purpose	Principle
xxx 01	*MANDATORY*	*CORE ASSESSED*	*PRI 2*

Indicator status

MANDATORY	Mandatory indicators reflect core practices. These responses will be made public and must be completed to submit the framework.
MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	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.
VOLUNTARY	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.
Peering	These indicators are used to determine your peer groups for assessment purposes.
Core assessed	These indicators form the core of the assessment and represent the majority of your final assessment score.
Additional assessed	These indicators represent more advanced or alternative practices and contribute to a smaller part of your score.
Descriptive	These are open-ended narrative indicators, allowing you to describe your activities.

Underneath the indicator

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

xxx 01	**EXPLANATORY NOTES**
xxx 01.1	This provides guidance on how to interpret the sub-indicators, including examples of what could be reported.
xxx 01.2	
LOGIC	
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.
ASSESSMENT	
xxx 01	This provides a brief overview of the pilot assessment approach for this indicator.

xxx 01	**DEFINITIONS**
xxx 01	Specific terms that are used in the indicator are defined here.

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Pathways through the module

OO 01: Signatory category and services

OO 02: Headquarters and operational countries

OO 03: Subsidiaries that are separate PRI signatories

OO 04: Reporting year and AUM

OO 05: Breakdown of AUM by asset class

OO 06: How would wish to disclose your asset class mix

OO 07 Breakdown of Fixed Income assets

OO 08: Segregated mandates or pooled funds — If externally managed assets are reported.

OO 09: Breakdown of AUM by market

OO 10: RI activities for listed equities and fixed income — If listed equity or fixed income is reported.

OO 11: RI activities in other asset classes

OO 12: Modules and sections required to complete

The following indicators appear based on assets reported in OO 05

OO LE 01: Breakdown by passive and active strategies

OO LE 02: Report on listed equity assets <10%

OO FI 01: Breakdown by passive and active strategies

OO FI 02: Report on fixed income assets <10%

OO FI 03: Breakdown by market and credit quality

OO SAM 01: Breakdown by passive and active strategies

OO HF 01: Hedge fund strategies and classification

OO PE 01: Breakdown of investments by strategy

OO PE 02: Typical level of ownership

OO PR 01: Breakdown of investments by ownership

OO PR 02: Breakdown of assets by management

OO PR 03: Largest property types

OO INF 01: Breakdown of investments by ownership

OO INF 02: Breakdown of assets by management

OO INF 03: Largest infrastructure

OO End: Module confirmation page

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Preface

The information reported in this module will allow your stakeholders to identify your organisation type and characteristics and will enable the PRI to define your peer group. This module also functions as a filter, since your responses will determine which indicators you will see in later stages of the Reporting Framework and, importantly, will ensure that you do not have to provide responses to indicators that are not relevant for your organisation.

Summary of updates

2019 Indicator	Update summary
OO 01.1	"Execution and advisory services" tickbox has been removed. Instead, all IM signatories will be presented with the chance to report on assets under execution and advisory approach in OO 04.4, or opt out if it is not relevant
OO 01.2	The hedge fund sub-indicator has been moved to the end of the OO module and renumbered as OO HF 01, and has updated selection options, which now allow the selection of multiple strategies.
OO 04	OO 04.2: clarification in the text to make it clearer what should be included and excluded from the AUM figure. A new tickbox "Not applicable as we are fund-raising" has been added OO 04.2: all signatories will be presented with the chance to report on assets under execution and advisory approach in OO 04.4, or opt out if it is not relevant by using a new tickbox
OO 05	Addition of "Fund of hedge funds" and "Money market instruments" in the table OO 05.1 OO 05.2 from 2018 has been moved into OO 06.5 for 2019.
OO 06	New indicators OO 06.3 and OO 06.4 for reporting off-balance sheet assets.
OO 08	Clarification in the text to make it clearer that pooled investments can be reported in table OO 08.1 "Fund of hedge funds" and "Money market instruments" included.
OO 09	"Emerging, Frontier and Other Markets" row has been split out into three separate rows, and the percentages are required instead of ranges.
OO 11	New option in OO 11.2 provided for reporters who only invest in pooled funds and do not do appointment. 2018 indicator [SAM 04.3] has been moved into OO 11 as OO 11.5, and is applicable if the new option (above) is chosen. "Fund of hedge funds" and "Money market instruments" included.
OO 12	Direct – Hedge Funds and/or Funds of Hedge Funds added as a new module.
OO LE 01, OO FI 01, OO FI 03, OO PE 01	The indicators are now "mandatory" and no longer voluntary to disclose. The percentage breakdown can be provided in ranges, instead of absolute figure values.

To view a detailed summary of changes to the module, please click here.
For any word limit in the module, please click here.

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SECTION

Basic information

OO 01	Indicator status MANDATORY	Purpose GATEWAY/PEERING	Principle GENERAL

OO 01	INDICATOR		
OO 01.1	Select the type that best describes your organisation or the services you provide.		
	Asset owners		**Select the type that best represents your primary activity**
	[a] Non-corporate pension or superannuation or retirement or provident fund or plan		❍
	[b] Corporate pension or superannuation or retirement or provident fund or plan		❍
	[c] Insurance company		❍
	[d] Foundation		❍
	[e] Endowment		❍
	[f] Development finance institution		❍
	[g] Reserve - sovereign or government-controlled fund		❍
	[h] Family office		❍
	[i] Other, specify_____		❍
	Investment managers	**Select the services and funds you offer**	**% of asset under management (AUM) in ranges**
	[j] Fund management		❍0%; ❍<10%; ❍10-50%; >❍50%
	[k] Fund of funds, manager of managers, sub-advised products		❍0%; ❍<10%; ❍10-50%; >❍50%
	[l] Other, specify_____		❍0%; ❍<10%; ❍10-50%; >❍50%
	Total		**100%**
	Further options for investment managers (may be selected in addition to the above)		
	[n] Hedge funds	❑	
	[o] Fund of hedge funds	❑	
OO 01.2	Additional information [OPTIONAL]		

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OO 01	EXPLANATORY NOTES
OO 01	Please see the definitions below for guidance on how to categorise your organisation. Please contact the PRI at reporting@unpri.org before responding 'Other' because this may render benchmarking results less useful for your organisation and your peers. *Asset owners* Asset owners should select the category that most closely represents their organisation. For example, if the organisation holds both pension and insurance funds, select the category that accounts for the largest proportion of assets under management (AUM). Please see the Overview & Guidance document for guidance on reporting on subsidiaries. *Investment managers* Select all that apply (h-k). If your organisation only offers one service, select " >50% ". You should base this calculation on your assets under management, excluding assets subject to an advisory or execution-only approach. You can select "Execution and advisory services" to indicate that you also provide these services. Indicator SG 16 will allow you to report on your approach to ESG in execution and advisory services. For the rest of the Framework, your reporting should focus on assets under management. When calculating percentages, Investment Managers with subsidiaries that are also PRI signatories should make sure that their response to this indicator is consistent with their response to [OO 03.2] and [OO 04], as well as in the asset mix provided [OO 05]. If you have chosen to exclude subsidiaries from your reporting, you should exclude them from all calculations in this module. Provide any additional information about your organisation, its mission, strategies, activities or investments that are important to contextualise your responsible investment activities.
LOGIC	
OO 01	Within indicator: The first part of this indicator is applicable for asset owners, and the second part, for investment managers. This will be defined by how your organisation has signed up to the PRI. Please contact the PRI if you would like to query your category.

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OO 01	DEFINITIONS
Asset owners	
Non-corporate pension or superannuation or retirement or provident fund or plan	An organisation that manages non-corporate retirement and/or pension plan-related assets. Your organisation probably has trustees or members of the board who are responsible for prudential operations, and some of your organisation's obligations might be codified by law.
Corporate pension or superannuation or retirement or provident fund or plan	An organisation that manages corporate retirement and/or pension plan-related assets. Your organisation probably has trustees who are responsible for prudential operations, and some of your organisation's obligations might be codified by law.
Insurance company	A financial institution that sells insurance or provides reinsurance services in the life and/or non-life insurance markets. Insurance companies are asset owners insofar as they have invested capital. This category does not include insurance consultants or insurance brokers. However, it does include those insurance companies that offer pension, superannuation or retirement products along with more conventional insurance products.
Foundation	A charitable non-governmental non-profit organisation, which usually derives its money from a family, an individual, or a corporation. Its principal fund is managed by its own trustees or directors. A private foundation generates income by investing its initial donation, often disbursing the bulk of its investment income each year to desired charitable activities.
Endowment	An investment fund often used by non-profits, universities, hospitals and churches, funded by donations that may or may not have a stated purpose at the bequest of the donor. Many non-profit organizations set up an endowment to sustain their fund-raising efforts over a long period because its principal balance remains intact and the interest generated from it is used for operating or fund-raising purposes. The investment income from dividends is usually devoted to charitable efforts.
Development finance institution	A financial institution that provides development finance (e.g., equity capital, loan capital) to fund businesses or economic development.
Reserve-sovereign or government-controlled fund	This includes sovereign wealth funds, treasury investment funds, stabilisation funds and government reserve funds (including those designed to provide a potential buffer for future pensions but do not have defined member accounts). These funds meet one or more of the following criteria: a) more than 50% of the AUM are owned by the government; b) the government has authority to appoint the board of directors and/or the CEO; and/or c) the government has direct or indirect influence on investment decisions. Development finance institutions should not be listed here.
Family office	The expression family office covers all forms of organisations and services involved in managing large private fortunes. These can be organised either as family-owned companies in which the family wealth is pooled, or as companies or bank departments that provide financial services for these clients while the family retains decision-making powers.
Other	Contact the PRI at reporting@unpri.org before reporting 'Other' because selecting this may render benchmarking results less useful for your organisation and your peers.
Investment managers	

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Fund management	This category includes those who invest directly in companies and other assets, not via third-party funds. This includes investors that perform investment research internally and provide list(s) of eligible (or ineligible) securities to sub-advisor(s).
Fund of funds, manager of managers, sub-advised products	This category includes all fund of funds managers, irrespective of the underlying asset class(es). Funds of hedge funds, mutual funds, real estate funds, private equity funds, etc., should select this category.
Other	Contact the PRI at reporting@unpri.org before listing 10% or more of your AUM in 'Other' because selecting this may render benchmarking results less useful for your organisation and your peers.
Hedge funds	Please select this option if you manage hedge funds. A definition of a hedge fund is provided in the PRI hedge fund industry guide
Fund of hedge funds	Please selected this option if you invest in funds of hedge funds. Hedge fund of funds invest with multiple managers through hedge funds or managed accounts. Further details can be found on the Hedge Fund research website

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OO 02	Indicator status MANDATORY	Purpose PEERING	Principle GENERAL

OO 02	INDICATOR
OO 02.1	Select the location of your organisation's headquarters. [drop down with countries]
OO 02.2	Indicate the number of countries in which you have offices (including your headquarters). ❍ 1 ❍ 2-5 ❍ 6-10 ❍ >10
OO 02.3	Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).
OO 02.4	Additional information. [OPTIONAL]

OO 02	**EXPLANATORY NOTES**
OO 02	This indicator is required for peering purposes and to contextualise your responses going forward.
OO 02.1	This should be the country where your headquarter office is registered. Most organisations have one headquarter office. However, if your organisation has more than one headquarter, please select the main location in terms of number of staff.
OO 02.2	This indicator is a proxy to measure the level of complexity organisations face. Please include any office part of your asset management business, irrespective of whether they are research, analysis, sales, or administrative offices. When a bank, insurance company or other institution is a PRI signatory only via its asset management subsidiary or business unit, it should only consider the offices that include staff of that subsidiary or business unit.
OO 02.3	Staff numbers include full-time employees involved directly in the investment decision-making process as well as supporting roles in administration, marketing and human resources. Staff figures should not include beneficiaries or clients. If the reporting organisation does not have any full-time staff, please state zero and use OO 02.4 to explain the structure. When a bank, insurance company or other institution is a PRI signatory only via its asset management subsidiary or business unit, it should only consider the staff of that subsidiary or business unit.

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OO 03	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle GENERAL

OO 03	INDICATOR	
OO 03.1	Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.	
	❍ Yes	❍ No
OO 03.2	List your subsidiaries that are separate PRI signatories and indicate if you would like to report their RI activities in your organisation's consolidated report.	
	Name of PRI signatory subsidiary	**RI implementation reported here on a consolidated basis**
		❍ Yes ❍ No
		❍ Yes ❍ No
		❍ Yes ❍ No
		❍ Yes ❍ No
		❍ Yes ❍ No
		❍ Yes ❍ No
OO 03.3	Additional information. [OPTIONAL]	

OO 03	EXPLANATORY NOTES
OO 03	The PRI requires that the highest level of a signatory organisation signs up on behalf of the entire organisation, including its subsidiaries. This means that signatories are typically required to report on all their consolidated AUM. However, once an organisation has become a signatory, its subsidiaries may still choose to sign up independently. If you are a majority owner of a subsidiary that has signed the PRI independently, the PRI still encourages you to report on all your AUM on a consolidated basis to produce a more holistic view of the responsible investment processes and practices within the group. We recognise that a consolidated submission may require additional time and resources to prepare. Therefore, if you have subsidiaries that are already reporting to the PRI independently, you have the option in this indicator to exclude these subsidiaries from your own submission and refer the reader to the individual submissions of these subsidiaries. Please ensure that your subsidiaries have signed the PRI and are completing the reporting before excluding them from your own report. It is important that your approach is consistent throughout the Reporting Framework. If a subsidiary's activities or AUM have been excluded in this indicator, they should be excluded from all reported information, including your organisation type [OO 01], AUM figure in [OO 04.2] and the asset mix [OO 05].

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LOGIC	
OO 03	Within indicator: [OO 03.2] will be applicable if 'Yes' is answered in [OO 03.1] Within module: If subsidiary organisations are reported in [03.2], whose AUM will not be covered by this report, then indicator [04.2] will be applicable.

OO 03	**DEFINITIONS**
Subsidiary	A subsidiary is a company that is partly or completely owned by another company holding a controlling interest in the subsidiary company. Controlling interest is normally at least 50% of the voting shares or, in the case of wholly owned subsidiary, 100% of the shares.

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OO 04	Indicator status MANDATORY	Purpose GATEWAY/PEERING	Principle GENERAL

OO 04	INDICATOR					
OO 04.1	Indicate the year end date for your reporting year.					
	Date	Year	Month		Day	
OO 04.2	Indicate your total AUM at the end of your reporting year. Include the AUM of subsidiaries, but exclude the AUM of subsidiaries, but exclude exclude advisory/execution only assets, and exclude the assets of your PRI signatory subsidiaries that you have chosen not to report on in OO 03.2					
	Total AUM	trillions	billions	millions	thousands	hundreds
	Currency	Select from a dropdown list: USD, EUR, GBP, CAD and AUD on top, then alphabetical.				
		Currency reported will be automatically converted into USD				
	❑ Not applicable as we are fund-raising					
OO 04.3	Indicate the total AUM of subsidiaries you have excluded from your report (as named in OO 03.2 under "No"). Provide this as a total figure at the end of your reporting year.					
	Total AUM of subsidiaries	trillions	billions	millions	thousands	hundreds
	Currency reported will be automatically converted into USD					
OO 04.4	Indicate the total assets at the end of your reporting year, subject to an execution and/or advisory approach.					
	Execution and advisory assets	trillions	billions	millions	thousands	hundreds
	Currency reported will be automatically converted into USD					
	❑ Not applicable as we do not have any assets under execution and/or advisory approach					
OO 04.4	Additional information. [OPTIONAL]					

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OO 04	EXPLANATORY NOTES
OO 04.1	The reporting year is the 12-month period that you chose to report on.
OO 04.2	The figure reported should represent your organisation's total AUM at the end of the reporting year. It should include uncalled commitments (e.g., in private equity or infrastructure). Exclusions may be made under the following circumstance: *1) Organisations with subsidiaries that are also signatories* If you have subsidiaries that are also PRI signatories, your response to this indicator should be consistent with indicator [OO 03.2], where you indicate whether you will report on the activities of those subsidiaries. If you have chosen not to report on the activities of some or all subsidiaries, their AUMs should not be reported in [OO 04.2]. Indicator [OO 04.3] will be available to report their AUMs. **Consolidated reporting** When determining the scope of reporting, responding organisations – Asset Owners (AOs) or Investment Managers (IMs) - should report on the total consolidated AUM of the entity that is the PRI signatory, including any subsidiaries that are more than 50% owned by the parent entity. All the AUM of majority owned subsidiaries should be included in the total AUM figure reported by the parent entity. There are some exceptions to the above: 1. An AO that majority owns an IM can exclude funds managed by subsidiary Investment Managers on behalf of third parties from their reported funds. This is designed to give AOs the option to report only on funds managed on behalf of their own beneficiaries. 2. If a subsidiary of a signatory is also a signatory to the PRI, the subsidiary will have to complete the Framework separately for their own total AUM, including any funds managed on behalf of their parent entity and other clients. In this case, the parent entity is still encouraged to report its consolidated AUM (hence still describing the activities of its subsidiary in its consolidated report) but it also can choose to exclude funds managed by the subsidiary from its own reported total AUM figure [OO 04.2] and hence from all the activities reported. An additional sub-indicator [OO 04.3] will be presented which will ask for the AUMs of excluded subsidiaries. **Converting to USD** The amount you indicated under total AUM in local currency will be converted to USD based on the 4 December 2018 exchange rates sourced from the International Monetary Fund. If you prefer to convert your AUM using another exchange rate, complete the information directly in USD.
OO 04.3	This indicator is applicable if you reported in OO 03.2 that your organisation has subsidiaries with AUMs that are not consolidated into this report. Here, you should provide the total AUMs for those subsidiaries. This figure is required to provide context to your report, to help avoid duplication in assets reported and for fee purposes.
LOGIC	

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OO 04	In OO 04.2, if “Not applicable as we are fund- raising“ is selected, then afigure in OO 04.2 is not requested. OO 04.4 is only presented to signatories who are investment managers. In OO 04.4, if “Not applicable as we do not have any assets under execution and/or advisory approach” is selected, then a figure in OO 04.4 is not requested. Between indicators: Indicator [OO 04.3] will be applicable if you report that you have subsidiaries that are also PRI signatories, but that have AUM that are not reported on a consolidated basis.

OO 04	**DEFINITIONS**
Execution and/or advisory services	Execution and/or advisory services offer clients a platform of holdings and funds to invest in. You may or may not advise these clients, but they ultimately make the investment decision. Advisory services involve offering clients investment advice while leaving the decision (or approval of a recommendation) to the client. Execution-only services offer the client a platform to make investments, but do not involve advising the client. This category includes investment platforms and/or third-party fund supermarkets on an execution or advisory basis. These types of services are typically offered by retail or private banks. Some investment management houses also provide these services.

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OO 05	Indicator status MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	Purpose GATEWAY	Principle GENERAL

OO 05	INDICATOR		
OO 05.1	Provide an approximate percentage breakdown of your AUM at the end of your reporting year using the following asset classes and investment strategies:		
		Internally managed	**Externally managed**
	[a] Listed equity	%	%
	[b] Fixed income	%	%
	[c] Private equity	%	%
	[d] Property	%	%
	[e] Infrastructure	%	%
	[f] Commodities	%	%
	[g] Hedge funds	%	%
	[h] Fund of hedge funds	%	%
	[i] Forestry	%	%
	[j] Farmland	%	%
	[k] Inclusive finance	%	%
	[l] Cash	%	%
	[m] Money market instruments	%	%
	[n] Other (1), specify_____	%	%
	[o] Other (2), specify_____	%	%
	Total (needs to add up to 100%)	**100%**	

OO 05	EXPLANATORY NOTES
OO 05.1	Your response to this indicator should be consistent with the AUM figure reported in [OO 04.2]. Assets subject to an advisory and/or execution-only approach should not be included, if possible. The asset mix should not include assets of PRI signatory subsidiaries you have chosen to exclude from your AUM figure in [OO 04.2]. Please read all the explanatory notes and definitions carefully before responding. Your response to this indicator will determine which modules, sections and indicators you will be asked to complete in later stages of the Reporting Framework. All denominators of percentages are based on total AUM. For asset classes that constitute less than 10% of your AUM, and where you incorporate ESG (OO 10 and OO 11) you will be given a choice as to whether you would like to

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	report on those asset categories in OO 12. While you may decide to opt out of reporting on the module, you will still be required to report in OO 10 and OO 11 on whether you addressed ESG incorporation into your investment decisions and/or your active ownership practices, and this response is considered in the assessment. In addition to reading these explanatory notes, please review the separate asset class definitions. This will help avoid double counting or listing assets in the wrong category. *Fiduciary managers* If you have a fiduciary manager who manages some of your assets directly themselves report those assets as internally managed. Where your fiduciary manager selects, appoints and monitors external managers, report those assets as indirectly managed. *Committed funds* Ideally, your asset class mix should include all uncalled commitments and committed funds (e.g., in private equity or infrastructure). However, if your organisation classifies these differently (for example, you can only provide a breakdown for invested capital), then please report it that way and explain in OO 05. If your organisation is 100% uncalled commitments (i.e., still in the fund-raising process), then you should classify this as "Other" and describe "Uncalled Commitments" in OO 05. *Sub-advised assets* If the buy-sell-hold decision is made internally, report these assets as directly managed assets. Where you are applying your own screen or integration approach on to the sub-advisors' investment universe and advising (but not actually making the buy-sell-hold decision) report these assets as externally managed.
LOGIC	
OO 05.1	Indicator [OO 08] will be applicable if you have externally managed asset class(es). Indicator [OO 10] will be applicable if you have internally and/or externally managed listed equity, or internally managed fixed income. Indicator [OO 11] will be applicable if you have internally and/or externally managed assets.

OO 05	**DEFINITIONS**
Internally and externally managed assets	
Internally and externally managed options	"Internally" refers to investment decisions (buy-sell-hold-weight) that are made within the organisation itself, including consolidated and wholly owned subsidiaries. Externally refers to investment decisions (buy-sell-hold-weight) made by third-party organisations (such as investment managers) on your behalf. Investment managers that primarily perform investment research internally and provide lists of eligible securities (or ineligible securities) to sub-advisor(s) should list their assets as internally managed. If you are a fund of funds or manager of managers but the investment decisions (buy-sell-hold) for the underlying assets are made by third parties, list your assets as externally managed. Check if any specifics of what to include in internally (direct) and externally (indirect) managed may be provided in the definitions of each asset class. For guidance on the distinction between internally and externally managed inclusive finance, see below.
Asset classes	
Listed equity	All listed equity in all jurisdictions. This does not include listed equity held in hedge funds.

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Fixed income — SSA	**Supranational**	Defined as debt securities issued by supranational organisations (e.g., bonds issued by multilateral development banks or international unions)
	Sovereigns	Defined as securities issued by sovereigns (e.g., government bonds in any denomination).
	Government agencies	Debt securities issued by government agencies (e.g., government sponsored agency bonds, quasi-government agencies)
	Sub-nationals	Defined as securities issued by municipalities, sub-nationals, local government bonds (e.g., muni bonds).
Fixed income—Corporate (financial)	Defined as securities issued by financial services companies, including banks and insurers. If your business also runs a banking arm, this does not include assets in your lending portfolio, such as deposits and loans.	
Fixed income—Corporate (non-financial)	Defined as securities issued by public or private non-financial companies. Includes senior or subordinated publicly listed debt, private debt or loans, project finance and infrastructure bonds.	
Fixed income—Securitised	Defined as securities backed by asset pools and issued by special purpose vehicles. Includes asset-backed securities, mortgage-backed securities, collateralised debt or loan obligations and covered bonds.	
Private equity	Equity stakes in privately held companies. Note that Infrastructure, Property and Inclusive Finance are treated as separate reporting categories. This is due to the different characteristics of investment in these sectors. When possible, investments in infrastructure, property and inclusive finance as non-listed equity should be reported in those categories rather than in Private Equity. Secondary interests in limited partnership investment funds should be reported in the Indirect—Manager Selection, Appointment and Monitoring (SAM) module.	
Property	All investments in direct non-listed physical property investments (equity only), investments in non-listed property funds and investments in listed or non-listed property companies that invest in property (where you are significantly involved in the investment decision) as internally managed (direct). List your investments in non-listed property funds or property management companies that make the investment decision and monitor on your behalf as externally managed (indirect). Real Estate Investment Trusts (REITs) Report any investments in REITs (or equivalent) where you are significantly involved in the investment selection or monitoring as internally managed property. Where you are not significantly involved in the investment selection or monitoring you should report these assets as externally managed property.	
Infrastructure	Unlisted infrastructure funds and direct infrastructure investments. This includes only equity.	
Forestry	All forms of forestry-related investments, including direct investments, forestry funds and managed investment schemes.	
Farmland	All forms of farmland and agriculture-related investments, including direct investments, farmland funds and managed investment schemes.	
Hedge funds	All investments in hedge fund structures, regardless of asset class or strategy. Investments in private or public companies through hedge fund structures should be reported here and not double counted (for example, listed equity held in hedge fund structures should not also be reported under listed equity).	

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Fund of hedge funds	Hedge fund of funds invest with multiple managers through hedge funds or managed accounts. Further details can be found on the Hedge Fund research website You should report fund of hedge funds as internally managed where the investment decision making is within your organisation. You should report fund of hedge funds as externally managed where the investment mandate has been delegated externally to another investment manager.
Commodities	All forms of commodity-related investment, including direct investments in physical assets, long exposure to commodities through commodity future contracts and commodity exchange traded funds (ETFs). When a hedge fund strategy includes some investment in commodities but this is not its exclusive focus, this should be included in your figures for hedge funds.
Inclusive finance	This category covers all direct Inclusive Finance investments, whether in the form of equity, debt or guarantees. This category includes any investment, direct or indirect, in a retail institution (i.e., company, bank, microfinance institution) that provides financial services (credit, savings, insurance, mortgages, remittances, payments) to clients who have traditionally been excluded from such services, whether consumers, microenterprises or SMEs. This could be in emerging or developed markets. For guidance on the distinction between internally managed (direct) and externally managed (indirect) investment, see below.
Cash	This category includes cash current (checking) accounts and savings accounts.
Money market instruments	Fixed-income securities with maturities of generally one year or less. Examples include Banker's Acceptance, Treasury Bills, Repurchase Agreements, Certificate of Deposits and Commercial Papers.
Other(s)	This category includes assets that do not fit any of the above categories.
Internally and externally managed inclusive finance	
Internally and externally managed inclusive finance options	Indirect investments include investments in microfinance investment intermediaries (MIIs) and investment entities that have microfinance as one of their core investment objectives and mandates. This could be via Microfinance Investment Vehicles (both public and private), holding companies and non-specialized microfinance investment funds (see definitions below). MIIs can provide debt (directly or indirectly), equity or guarantees to microfinance institutions (MFIs). MIIs have a range of return expectations depending on whether they emphasise a financial or social return objective, but in all cases, they are aiming at recovering their capital with a profit. There are three main types. 1. Microfinance Investment Vehicles (MIVs) are independent investment entities specialised in microfinance, with more than 50 percent of their non-cash assets invested in microfinance. They are either self-managed or managed by an investment management firm and are open to multiple investors. MIVs may issue shares, notes, or other financial instruments. 2. Holding Companies provide financing and technical assistance to microfinance institutions. They usually hold a majority stake in their investees and are generally investible only by private invitation. 3. Other MIIs include but are not limited to: • microfinance investment funds that are not open to multiple investors; • investment entities not specialized in microfinance, but with a significant microfinance investment portfolio; • Peer-to-Peer microlenders; and • fund of funds.

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OO 06	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle GENERAL

OO 06	INDICATOR		
OO 06.1	Select how you would like to disclose your asset class mix.		
	❍ as percentage breakdown ❍ as broad ranges		
OO 06.2	Publish asset class mix as per attached image		
	[upload image in one of the following formats: .jpg, .png,.bmp or .gif] [OPTIONAL]		
OO 06.3	Indicate whether your organisation has any off-balance sheet assets.		
	❍ Yes	❍ No	
OO 06.4	Provide an approximate percentage breakdown of any off-balance sheet assets		
		Internally managed	**Externally managed**
	Monetary assets	____ %	____ %
	Derivatives	____ %	____ %
	Cash	____ %	____ %
	Trade finance	____ %	____ %
	Other (1), specify_____	____ %	____ %
	Other (2), specify_____	____ %	____ %
OO 06.5	Indicate whether your organisation uses fiduciary managers.		
	❑ Yes, we use a fiduciary manager and our response to OO 5.1 is reflective of their management of our assets. ❍ No, we do not use fiduciary managers.		
OO 06.6	Provide contextual information on your AUM asset class split. [OPTIONAL]		

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OO 06	EXPLANATORY NOTES
OO 06.1	The automated RI transparency report generated from your responses to this tool will include a section on your asset class mix. We encourage you to disclose your asset mix along the PRI suggested guidelines so that it is easier for readers to identify information in a consistent manner across signatories. Moreover, these categories match the coverage of the modules of the Reporting Framework, making it easier to understand their size and weighting in your portfolio.
OO 06.2	If you prefer to report your asset class mix based on your own approach as well, you can do so here by uploading a separate image file. The following image formats are permitted: .jpg, .png,.bmp and .gif
OO 06.5	If you select “Yes” in this indicator, you will need to report to SG 12.5 “Indicate whether your organisation considers any of the following responsible investment factors in the monitoring of fiduciary managers”.

OO 06	DEFINITIONS
Derivatives	This category should include all forms of derivatives, the underlying assets of which may be any kind of existing financial security (stocks, bonds, commodities, currencies, market indexes, interest rates, credit cards, etc.). Please report your derivatives securities related to each asset class directly in the “Derivatives” row, and not in the asset class; for example an equity derivative should be reported under “Derivatives” and not “Listed Equity”. Typically, derivatives are classified in two broad categories: customised contracts (traded Over-the-Counter such as forwards) or standardised contracts (listed on an exchange such as warrants and futures). Examples of derivatives include: Futures (commodity future, currency futures, dividend futures, etc.), forwards, swaps (interest-rate, currency, index-return, Constant Maturity swaps, Total return Swap etc.), exotic derivatives (Inflation derivatives, weather derivatives, credit-linked note, credit derivatives, equity-linked note, etc.) interest-rate derivatives (caps, floors, swaptions, IRS, etc.), equity derivatives (options, warrants, convertible bonds, single-stock futures, etc).
Monetary assets	Monetary assets are short term instruments, including financial guarantees, standby letters of credit, bank loan commitments, and note issuance facilities

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OO 07	Indicator status MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	Purpose GATEWAY	Principle GENERAL

OO 07	INDICATOR		
OO 07.1	Provide to the nearest 5% the percentage breakdown of your Fixed Income AUM at the end of your reporting year, using the following categories.		
	Type of fixed income	**Internally managed**	**Externally managed**
	SSA	____ %	____ %
	Corporate (financial)	____ %	____ %
	Corporate (non-financial)	____ %	____ %
	Securitised	____ %	____ %
	Total fixed income AUM	**100%**	**100%**

OO 07	DEFINITIONS	
Asset classes		
SSA	**Supranational**	Defined as debt securities issued by supranational organisations (e.g., bonds issued by multilateral development banks or international unions)
	Sovereigns	Defined as securities issued by sovereigns (e.g., government bonds in any denomination).
	Government agencies	Debt securities issued by government agencies (e.g., government sponsored agency bonds, quasi-government agencies)
	Sub-nationals	Defined as securities issued by municipalities, sub-nationals, local government bonds (e.g., muni bonds).
Corporate (financial)		Defined as securities issued by financial services companies, including banks and insurers. If your business also runs a banking arm, this does not include assets in your lending portfolio, such as deposits and loans.
Corporate (non-financial)		Defined as securities issued by public or private non-financial companies. Includes senior or subordinated publicly listed debt, private debt or loans, project finance and infrastructure bonds.
Securitised		Defined as securities backed by asset pools and issued by special purpose vehicles. Includes asset-backed securities, mortgage-backed securities, collateralised debt or loan obligations and covered bonds.

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OO 07	EXPLANATORY NOTES
OO 07.1	Your organisation's breakdown of fixed income assets will be used to trigger subsequent columns in the Fixed Income module. Refer to the taxonomy in the preface for more information on the four different types of fixed income applied.
LOGIC	
OO 07.1	[OO 07] will be applicable if you report an fixed income assets in [OO 05]. This is a gateway indicator, so your organisation's breakdown of SSA, corporate—(financial), corporate—(non-financial) and/or securitised will be used to trigger subsequent indicators. *If your total directly managed fixed income allocation is 10% or more of your total AUM:* • Reporting will be mandatory for any type of directly managed fixed income that comprises 10% or more of your total directly managed fixed income assets. You will be presented with the respective fixed income type indicators in the Fixed Income module. • Reporting will be voluntary for any type of directly managed fixed income that comprises less than 10% of your total directly managed fixed income assets. You will be able to select whether you would like to report on these fixed income types in indicator OO 12. *If your total directly managed fixed income allocation is less than 10% of your total AUM:* • Reporting will be voluntary for all types of directly managed fixed income. You will be able to select whether you would like to report on these fixed income types in indicator OO 12. *If your total indirectly managed fixed income allocation is 10% or more of your total AUM:* • Reporting will be mandatory for any type of indirectly managed fixed income that comprises 10% or more of your total indirectly managed fixed income assets. When this is the case, you will be presented with the respective fixed income type indicators in the Indirect—Manager selection, appointment and monitoring module. • Reporting will be voluntary for any type of indirectly managed fixed income that comprises less than 10% of your total indirectly managed fixed income assets. You will be able to select whether you would like to report on these fixed income types in indicator OO 12. *If your total indirectly managed fixed income allocation is less than 10% of your total AUM:* • Reporting will be voluntary for all types of indirectly managed fixed income. You will be able to select whether you would like to report on these fixed income types in indicator OO 12.

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OO 08	Indicator status MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	Purpose PEERING	Principle GENERAL

OO 08	INDICATOR			
OO 08.1	Provide a breakdown of your organisation's externally managed assets between segregated mandates, and pooled funds or investments.			
	Asset class breakdown	Segregated mandate(s)	Pooled fund(s) or pooled investment(s)	**Total of the asset class (each row adds up to 100%)**
	[a] Listed equity	Each row: ❍ 0%, ❍ <10%, ❍ 10-50%, ❍ >50%	Each row: ❍ 0%, ❍ <10%, ❍ 10-50%, ❍ >50%	Each row: 100%
	[b] Fixed income – SSA			
	[c] Fixed income – Corporate (financial)			
	[d] Fixed income – Corporate (non-financial)			
	[e] Fixed income – Securitised			
	[f] Private equity			
	[g] Property			
	[h] Infrastructure			
	[I] Commodities			
	[j] Hedge funds			
	[k] Fund of hedge funds			
	[l] Forestry			
	[m] Farmland			
	[n] Inclusive finance			
	[o] Cash			
	[p] Money market instruments			
	[q] Other (1), specify_____			
	[r] Other (2), specify_____			
OO 08.2	Additional information [OPTIONAL]			

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OO 08	EXPLANATORY NOTES
OO 08.1	This indicator only applies to externally managed assets. All percentages should represent the percentage of your externally managed assets in segregated mandates/pooled funds/fund of funds. The reason for differentiating between segregated mandates and pooled funds is that, as the definitions below indicate, the level of influence that can be exerted by individual investors—and hence the approach to incorporating ESG factors into the selection, appointment and monitoring of external managers—can differ significantly. Therefore, your breakdown will be used during assessment to peer your organisation against those with a similar breakdown.
LOGIC	
OO 08.1	This indicator will only be applicable if you reported externally managed assets in OO 05.1

OO 08	DEFINITIONS
Segregated mandate(s)	Investment(s) run exclusively on the organisation's behalf, in which investment criteria (which may include how ESG factors are considered in the investment process or expectations around engagement or voting) are determined in consultation with the signatory and assets are managed in accordance with these criteria.
Pooled fund(s)	Investment schemes in which assets from individual investors are aggregated for the purposes of investment. In general, investors in these funds tend to have less influence over the investment criteria for these funds than for segregated mandates.

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OO 09	Indicator status MANDATORY	Purpose PEERING	Principle GENERAL

OO 09	INDICATOR	
OO 09.1	Indicate the breakdown of your organisation's AUM by market.	
	Developed Markets	%
	Emerging Markets	%
	Frontier Markets	%
	Other Markets	%
	Total	**100%**
OO 09.2	Additional information. [OPTIONAL]	

OO 09	EXPLANATORY NOTES
OO 09	Markets and countries have been classified according to MSCI's market classification framework. For a detailed outline, follow this link. Definitions can be found below. In the event of any difference between the list below and MSCI's website, please follow the the MSCI classification. The possible RI implementation actions for investors in developed markets may be different from those available to investors in emerging, frontier and other markets. By reporting this information, you will be able to compare your own implementation progress against peers with a similar breakdown.

OO 09	DEFINITIONS
Developed markets	Based on MSCI's classification, the following countries are included in the developed market category: Americas: Canada, USA Europe and Middle East: Austria, Belgium, Denmark, Finland, France, Germany, Ireland, Israel, Italy, Netherlands, Norway, Portugal, Spain, Sweden, Switzerland, United Kingdom. Pacific: Australia, Hong Kong, Japan, New Zealand, Singapore
Emerging markets	Based on MSCI's classification, the following countries are included in the emerging market category: Americas: Brazil, Chile, Colombia, Mexico, Peru.

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	EMEA: Czech Republic, Egypt, Greece, Hungary, Poland, Qatar, Russia, South Africa, Turkey, United Arab Emirates Asia: China, India, Indonesia, Korea, Malaysia, Pakistan, Philippines, Taiwan, Thailand.
Frontier markets	Based on MSCI's classification, the following countries are included in the frontier market category: Americas: Argentina Europe & CIS: Croatia, Estonia, Lithuania, Kazakhstan, Romania, Serbia, Slovenia. Africa: Kenya, Mauritius, Morocco, Nigeria, Tunisia, Benin, Burkina Faso, Ivory Coast, Guinea-Bissau, Mali, Niger, Senegal, Togo, Senegal, Ivory Coast and Burkina Faso. Middle East: Bahrain, Jordan, Kuwait, Lebanon, Oman Asia: Bangladesh, Sri Lanka, Vietnam.
Other markets	Other markets include all countries not listed in the above categories: Jamaica, Panama, Trinidad & Tobago, Bosnia Herzegovina, Bulgaria, Ukraine, Botswana, Ghana, Zimbabwe, Palestine.

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SECTION

Gateway asset class implementation indicators

OO 10	Indicator status MANDATORY	Purpose GATEWAY	Principle GENERAL

OO 10	INDICATOR			
OO 10.1	Select the active ownership activities your organisation implemented in the reporting year.			
	Listed equity – engagement	❑ We engage with companies on ESG factors via our staff, collaborations or service providers.	❑ We require our external managers to engage with companies on ESG factors on our behalf.	❍ We do not engage directly and do not require external managers to engage with companies on ESG factors. *(Triggers OO 10.2)*
	Listed equity – voting	❑ We cast our (proxy) votes directly or via dedicated voting providers	❑ We require our external managers to vote on our behalf.	❍ We do not cast our (proxy) votes directly and do not require external managers to vote on our behalf *(Triggers OO 10.3)*
	Fixed income SSA – engagement	❑ We engage with SSA bond issuers on ESG factors via our staff, collaborations or service providers	❑ We require our external managers to engage with SSA bond issuers on ESG factors on our behalf	❍ We do not engage directly and do not require external managers to engage with SSA bond issuers on ESG factors. Please explain why you do not. ___
	Fixed income Corporate (financial) – engagement	❑ We engage with companies on ESG factors via our staff, collaborations or service providers	❑ We require our external managers to engage with companies on ESG factors on our behalf	❍ We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not. ___
	Fixed income Corporate (non-financial) – engagement	❑ We engage with companies on ESG factors via our staff, collaborations or service providers	❑ We require our external managers to engage with companies on ESG factors on our behalf	❍ We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not. ___
	Fixed income Corporate (securitised) – engagement	❑ We engage with companies on ESG factors via our staff,	❑ We require our external managers to engage with companies on	❍ We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not. ___

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		collaborations or service providers	ESG factors on our behalf	
OO 10.2	Indicate why you do not engage and do not require external managers to engage.			
OO 10.3	Indicate why you do not cast your votes.			
	❍ Indicate why you do not cast your votes _____. ❍ We do not cast our votes but provide substantive research and voting recommendations to our clients. Describe the process and the actions taken____.			

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OO 10	EXPLANATORY NOTES
OO 10	Your responses to this gateway indicator will determine which modules you will see in later stages of the Reporting Framework. If you have externally managed funds and delegate responsibility for incorporation, engagement and/or voting to your external managers, you should select “We address ESG incorporation in our external manager selection, appointment and/or monitoring processes” in OO 10.1, “We require our external managers to engage with companies on ESG issues on our behalf” in OO 10.2 and “We require our external managers to vote on our behalf” in OO 10.3. You should only select “We engage with companies on ESG issues via our staff, collaborations or service providers” in OO 10.2 or “We cast our (proxy) votes directly or via dedicated voting providers” in OO 10.3 if these activities are carried out in-house or using a service provider recruited specifically for that purpose. To find out more on how your peers practice active ownership, view our series of interactive data reports: listed equity active ownership , fixed income and asset owner practices on externally managed assets . These are all available on the Data Portal and the PRI website.

LOGIC	
OO 10	[OO 10] will be applicable if you reported any listed equity or fixed income assets in [OO 05.1] [OO 10.2] is applicable if you select “We do not engage directly and do not require external managers to engage with companies on ESG factors.” [OO 10.3] is applicable if you select “We do not cast our (proxy) votes directly and do not require external managers to vote on our behalf“The following will apply based on your reported information: OO 10.1 "Listed equity - engagement" row: • ‘We engage with companies on ESG issues via our staff, collaborations or service providers’ influences whether the engagement section of Listed Equity Active Ownership (LEA) module is applicable. • ‘We require our external managers to engage...’ influences whether engagement sections in the Selection, Appointment and Monitoring (SAM) for listed equity is applicable. OO 10.1 "Listed equity - voting" row: • ‘We cast our (proxy) votes directly or via dedicated voting providers’ influences whether the (proxy) voting section of LEA is applicable. • ‘We require our external managers to vote on our behalf’ influences whether the module Selection, Appointment and Monitoring (SAM), listed equity voting path is applicable. OO 10.1 "Fixed income – engagement" rows (SSA given below as example, replace (SSA) for the Fixed Income type(s) that apply to you) Fixed income (SSA) – engagement • ‘We engage with companies on ESG issues via our staff, collaborations or service providers’ influences whether the engagement section of Fixed Income module is applicable for (SSA), which is indicators [FI 15 - FI 17] • ‘We require our external managers to engage...’ influences whether engagement sections in the Selection, Appointment and Monitoring (SAM) is applicable for (SSA) fixed income.
ASSESSMENT	

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OO 10	This indicator is not directly assessed but information disclosed here may have an impact on the assessment of other modules. Where the last option, "we do not…" has been selected, the following apply: • OO 10.1 listed equity enagement: zero ★ for LEA engagement section score • OO 10.1 listed equity proxy voting: zero ★ for LEA voting section score • OO 10.1 fixed income engagement an "E" for Fixed Income module (enagemen questions) While we collect reported data on engagement under Fixed Income – SSA, this is not assessed; only Fixed Income Corporate Financial, Non-Financial, and Securitised engagements are assessed.

OO 10	DEFINITIONS
Active ownership	Active ownership is the use of the rights and position of ownership to influence the activity or behaviour of investees. This can be applied differently in each asset class. For listed equities, it includes both engagement and (proxy) voting (including filing shareholder resolutions). For other asset classes (e.g., fixed income), engagement may still be relevant while (proxy) voting may not.
Incorporation	Under Principle 1 of the PRI, signatories undertake to incorporate ESG issues into investment analysis and decision-making processes. Throughout the Reporting Framework, we refer to ESG incorporation as the review and use of ESG information in the investment decision-making process. The Reporting Framework addresses four ways in which this can be done: • screening; • sustainability themed investment (also referred to as environmentally and socially themed investment); • integration of ESG issues; and • a combination of the above. Assets subject to an engagement approach only and not subject to any of the above strategies should not be included in ESG incorporation. To improve standardisation and communication in the responsible investment industry, the PRI is aligning its definitions with those of the Global Sustainable Investment Alliance. See the Main Definitions document for additional details.
Engagement	Engagement refers to interactions between the investor and current or potential investees (which may be companies, governments, municipalities, etc.) on ESG issues. Engagements are undertaken to influence (or identify the need to influence) ESG practices and/or to improve ESG disclosure.
(Proxy) voting	Voting refers to voting on management and/or shareholder resolutions as well as filing shareholder resolutions.

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OO 11	Indicator status MANDATORY	Purpose GATEWAY	Principle GENERAL

OO 11	INDICATOR	
OO 11.1	Select the internally managed asset classes in which you addressed ESG incorporation into your investment decisions and/or your active ownership practices (during the reporting year).	
	Listed equity Fixed income — SSA Fixed income — Corporate (financial) Fixed income — Corporate (non-financial) Fixed income — Securitised Private equity Property Infrastructure Commodities Hedge funds Fund of hedge funds Forestry Farmland Inclusive finance Cash Money market instruments Other (1) Other (2) None of the above	Option for each asset class presented: ❍ We address ESG incorporation. ❍ We do not do ESG incorporation.
OO 11.2	Select the externally managed assets classes in which you addressed ESG incorporation and/or active ownership in your external manager selection, appointment and/or monitoring processes (during the reporting year).	
	Asset class	ESG incorporation and/or active ownership addressed in your external manager selection, appointment and/or monitoring processes

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	Listed equity Fixed income — SSA Fixed income — Corporate (financial) Fixed Income — Corporate (non-financial) Fixed Income — Securitised Private equity Property Infrastructure Commodities Hedge funds Fund of hedge funds Forestry Farmland Inclusive finance Cash Money market instruments Other (1) Other (2) None of the above	*Mutli-select tickboxes for each asset class*: ❑ We incorporate ESG into our external manager selection process ❑ We incorporate ESG into our external manager appointment process ❑ We invest only in pooled funds and external manager appointment is not applicable ❑ We incorporate ESG into our external manager monitoring process ❍ We do not do ESG incorporation.
OO 11.3a	If your organisation does not integrate ESG factors into investment decisions on your internally managed assets, please explain why not.	
OO 11.3b	If your organisation does not integrate ESG factors into investment decisions on your externally managed assets, explain why not.	
OO 11.4	Provide a brief description of how your organisation includes responsible investment considerations in your investment manager selection, appointment and monitoring processes.	
OO 11.5	For your externally managed pooled funds, describe any mechanisms in place to set expectations as part of the appointment or commitment process.	

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OO 11	EXPLANATORY NOTES
OO 11	Your responses to this indicator will determine which indicators or modules you will see in later stages of the Reporting Framework.
OO 11.1	To find out more on how your peers have responded on this practice, view our analysis and visualisation on the Responsible investment page of our interactive data report for directly managed assets available on the Data Portal and the PRI website.
OO 11.2	To find out more on how your peers have responded on this practice, view our analysis and visualisation in the asset owner interactive data report available on the Data Portal and the PRI website.
OO 11.3	This may include a discussion of the asset classes in which you are not implementing PRI Principle 1 about ESG incorporation and/or Principle 2 about active ownership.
OO 11.5	If you invest in pooled funds, you can describe any other mechanism in place to set expectations as part of the appointment or commitment process in the. This may for example be informally setting expectations through conversations and relationship building.
LOGIC	
OO 11.1	Internally managed assets: • For Listed Equity, selecting "We address ESG incorporation" will trigger the LEI module. • For Fixed Income asset classes, selecting "We address ESG incorporation" will trigger the applicable fixed income categories' indicators in the FI module - for example, "We address ESG incorporation" for "SSA" will trigger SSA reporting in the Fixed Income module. • For all other asset classes for which there is a module, this selection will trigger the applicable asset class module. However, if your AUM is below the 10% threshold, you will be able to choose to not report on it in OO 12. In the case of infrastructure, which is a voluntary module in this reporting period, you will be able to choose to not report on it even if it is above the threshold. • For all other asset classes for which there is no module, selecting this option will trigger a free text box in SG 16 (for internally managed assets) and/or SG 17 (for externally managed assets), in which you can describe your approach.
OO 11.2	Externally managed assets: • For all asset classes, this selection will trigger the applicable indicators in the SAM module, for example if you report "Appointment" for Listed Equity, you will be able to report for Listed Equity appointment in SAM 04.1. • If your AUM is below the 10% threshold, you will be able to choose to not report on it in OO 12. In the case of the Infrastructure asset class, the 10% threshold does not apply and you will be able to choose whether to report on it in OO 12.
OO 11.5	This question appears if you select "We invest only in pooled funds and external manager appointment is not applicable" in OO 11.2
ASSESSMENT	

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OO 11	This indicator is not directly assessed but information disclosed here may have an impact on the assessment of other modules; if you have less than 10% in an asset class, you will still be required to report on whether you addressed ESG incorporation into your investment decisions and/or your active ownership practices, and this is considered in the assessment. If you select the option "We invest only in pooled funds and do not do appointment " then you will score NA for the Appointment section in the SAM module. Where there is an asset class presented as an option but it has not been ticked, the following apply: • OO 11.1: an "E" for the direct modules which are present as a tickbox but have not been ticked • OO 11.2: an "E" for the indirect modules which are present as a tickbox but have not been ticked

OO 11	**DEFINITIONS**
Incorporation	Under Principle 1 of the PRI signatories undertake to incorporate ESG issues into investment analysis and decision-making processes. Throughout the Reporting Framework, we refer to ESG incorporation as the review and use of ESG information in the investment decision-making process. The Reporting Framework addresses four ways in which this can be done: Screening Sustainability themed investment (also referred to as environmentally and socially themed investment) Integration of ESG issues A combination of the above Assets subject to an engagement approach only and not subject to any of the above strategies should not be included in ESG incorporation. See the Main Definition document for additional details.
Selection	Selection is all actions that lead up to choosing an external manager (shortlisting, questionnaires, meetings etc.).
Appointment	The appointment process is when investors formalise the relationship with their external manager through specific goals and objectives via agreement, side letter or other documentation.

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OO 12	Indicator status MANDATORY	Purpose GATEWAY	Principle GENERAL

OO 12	INDICATOR	
OO 12.1	Select from below any additional applicable modules or sections you would like to report on voluntarily. You are only required to report on asset classes that represent 10% or more of your AUM.	
	Core modules	
	❑ Strategy and Governance (including asset classes that do not have a separate module)	
	RI implementation directly or via service providers	**RI implementation via external managers**
	❒ Direct—Listed equity incorporation ❒ Direct—Listed equity active ownership ○ Direct—Engagements ○ Direct—(Proxy) voting ❒ Direct—Fixed income ○ Direct—Fixed income — SSA ○ Direct—Fixed income — Corporate (financial) ○ Direct—Fixed income — Corporate (non-financial) ○ Direct—Fixed income — Securitised ❒ Direct—Private equity ❒ Direct—Property ❒ Direct—Infrastructure ❒ Direct—Hedge Funds and/or Funds of Hedge Funds ❒ Direct—Inclusive finance	❒ Indirect—Selection, Appointment and Monitoring of External Managers ○ Indirect—Listed equities ○ Indirect—Fixed income — SSA ○ Indirect—Fixed income — Corporate (financial) ○ Indirect—Fixed income — Corporate (non-financial) ○ Indirect—Fixed income — Securitised ○ Indirect—Private equity ○ Indirect—Property ○ Indirect—Infrastructure ❒ Indirect—Inclusive finance

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OO 12	
LOGIC	
OO 12	If you have stated in your response to previous indicators that you are not implementing responsible investment in certain asset classes or areas, you will not see that module or section in this indicator, even if your AUM are 10% or above the threshold. Once you confirm you are doing a certain activity, the thresholds used to determine whether you must report on certain modules or sections are outlined below: • Signatories that manage 10% of AUM or more of a certain asset class internally will be required to report against the direct relevant module. • Signatories that manage less than 10% of AUM of a certain asset class internally will not be required to report against the direct relevant module. Moreover, for this 2016 reporting cycle, signatories will be able to choose whether to report on the Infrastructure direct module irrespective of their percentage in the portfolio. • Signatories that hold 10% of AUM or more of a certain asset class externally will be required to report against the relevant asset class in the SAM module. • Signatories that hold less than 10% of AUM of a certain asset class externally will not be required to report against the relevant asset class in the SAM module. Moreover, for this 2016 reporting cycle, signatories will be able to choose whether to report in SAM Infrastructure sub-indicators irrespective of their percentage in the portfolio. • Signatories that engage and/or cast their (proxy) votes internally will not be required to report against the direct listed equity active ownership (LEA) module if the combined internally and externally managed assets are less than 10%. • PIIF signatories that hold more than 50% of AUM in internally or externally in inclusive finance are required to complete only the Organisational Overview and the Inclusive Finance modules. The Strategy and Governance module will be optional to complete with this breakdown. • Moreover, majority inclusive finance direct investors that have less than 10% of their inclusive finance assets invested indirectly are not required to complete the Indirect—Inclusive Finance module.
ASSESSMENT	
	This indicator is not assessed, but has assessment implications. For asset classes which are <10% of AUM, you may be offered the option in OO 12 to not report on the related module. However, opting out of the reporting is not opting out of assessment; the assessment will still consider your response in OO 10 - whether you are conducting any active ownership activities, and OO 11 - whether you are incorporating ESG or conducting active ownership.

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SECTION

Listed Equity

OO LE 01	Indicator status	Purpose	Principle
	MANDATORY	GATEWAY	GENERAL

OO LE 01	INDICATOR	
OO LE 01.1	Provide a breakdown of your internally managed listed equities by passive, quantitative, fundamental and other active strategies.	
	Strategies	**Percentage of internally managed listed equities**
	❑ Passive	❍>50%, ❍10-50%, ❍<10%, ❍ 0%
	❑ Active — quantitative (quant)	❍>50%, ❍10-50%, ❍<10%, ❍ 0%
	❑ Active — fundamental and other active strategies	❍>50%, ❍10-50%, ❍<10%, ❍ 0%
	Total internally managed listed equities	**100%**
OO LE 01.2	Additional information [OPTIONAL]	

OO LE 01	EXPLANATORY NOTES
OO LE 01.1	This indicator has changed from "Mandatory to report, voluntary to disclose" to "Mandatory". Your response to this indicator will be published in the Public Transparency Report. This change to "Mandatory" will enable better analysis and peering Your organisation's breakdown of passive, active quantitative and active fundamental and other strategies will be used to trigger subsequent indicators.
LOGIC	
OO LE 01	[OO LE 01] will be applicable if you reported any internally managed listed equity in [OO 05.1] Between indicators: • if Passive is reported, indicator [LEI 11] will be applicable; and • if Active—quantitative and/or fundamental is reported, indicator [LEI 01] will be applicable. In this indicator, you will be able to report different ESG incorporation strategies. Your selection(s) will determine which subsequent indicators will be applicable. Please see additional details in [LEI 01].
ASSESSMENT	
OO LE 01	**If you only select 'Passive',** you will not be assessed in the Direct—Listed Equity Incorporation (LEI) module due to the low number of assessed indicators that you will complete in the 'Passive investments that incorporate ESG' section.

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	If you select 'Active—quant' and/or 'Active—fundamental and other' OR 'All three strategies', you will be assessed on your responses to the 'Implementation Process', 'Implementation', 'Outputs and outputs' and 'Communication' sections.

OO LE 01	**DEFINITIONS**
Actively and passively managed strategies	
Passive strategies	Passive investments are investments that mirror the performance of an index and follow a pre-determined buy and hold strategy that does not involve active forecasting. Examples include investments in broad capital market indices, ESG weighted indices, themed indices, passive managed ETFs or indices with ESG-based exclusions.
Active—quantitative (quant) strategies	Investment strategies or funds for which the manager builds computer-based models to determine whether an investment is attractive. In a pure "quant model", the model makes the final decision to buy or sell.
Active—fundamental	Fundamental strategies in which investment decisions are based on human judgement. This includes both bottom-up (e.g., stock-picking) and top-down (e.g., sector-based) strategies.
Active—other	Strategies that do not match any of the above strategies. These may be active strategies that combine active quant and active fundamental strategies or other strategies that you believe do not fit any of the above definitions. You may clarify your strategy in the [01.2] Additional Information indicator.

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OO LE 02	Indicator status MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	Purpose GATEWAY	Principle GENERAL

OO LE 02	INDICATOR	
OO LE 02.1	For strategies that account for less than 10% of your internally managed listed equities, indicate if you would still like to report your activities.	
	Strategies	**Report on strategy**
	Passive	❍ Yes ❍ No
	All active strategies	❍ Yes ❍ No
OO LE 02.2	Additional information. [OPTIONAL]	

OO LE 02	**DEFINITIONS**
Actively and passively managed strategies	
Active	Active strategies may include quantitative, fundamental, or other active strategies. Quantitative (quant) strategies are investment strategies or funds for which the manager builds computer-based models to determine whether an investment is attractive. In a pure 'quant model', the model makes the final decision to buy or sell. Fundamental strategies are where investment decisions are based on human judgment. This includes both bottom-up (e.g., stock-picking) and top-down (e.g., sector-based) strategies.
Passive	Passive investments are investments that mirror the performance of an index and follow a pre-determined buy and hold strategy that does not involve active forecasting. Examples include investments in broad capital market indices, ESG weighted indices, themed indices, passive managed ETFs or indices with ESG-based exclusions.
LOGIC	
OO LE 02	If you select 'yes' for any active strategy, indicators [LEI 01 to LEI 13] will be applicable. If you select 'yes' to passive strategy, indicator [LEI 11] will be applicable. If you select 'no' for both active strategy and 'yes' to passive strategy, indicators [LEI 03 to LEI 10] will not be applicable.

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SECTION

Fixed Income

OO FI 01	Indicator status MANDATORY	Purpose GATEWAY	Principle GENERAL

OO FI 01	INDICATOR				
OO FI 01.1	Provide a breakdown of your internally managed fixed income securities by active and passive strategies.				
	Type	**Passive**	**Active - quantitative**	**Active – fundamental and other active**	**Total internally managed fixed income security**
		Percentage of internally managed fixed income assets (+/- 5%)			
	SSA	❍>50%, ❍10-50%, ❍<10%, ❍ 0%	❍>50%, ❍10-50%, ❍<10%, ❍ 0%	❍>50%, ❍10-50%, ❍<10%, ❍ 0%	**100%**
	Corporate (financial)	❍>50%, ❍10-50%, ❍<10%, ❍ 0%	❍>50%, ❍10-50%, ❍<10%, ❍ 0%	❍>50%, ❍10-50%, ❍<10%, ❍ 0%	**100%**
	Corporate (financial)	❍>50%, ❍10-50%, ❍<10%, ❍ 0%	❍>50%, ❍10-50%, ❍<10%, ❍ 0%	❍>50%, ❍10-50%, ❍<10%, ❍ 0%	**100%**
	Securitised	❍>50%, ❍10-50%, ❍<10%, ❍ 0%	❍>50%, ❍10-50%, ❍<10%, ❍ 0%	❍>50%, ❍10-50%, ❍<10%, ❍ 0%	**100%**
OO FI 01.2	Additional information [OPTIONAL]				

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OO FI 01	EXPLANATORY NOTES
OO FI 01	To find out more on how your peers have responded on this practice, view our analysis and visualisation in the fixed income interactive data report available on the Data Portal and the PRI website
LOGIC	
OO FI 01.1	[OO FI 01] will be applicable if you reported any internally managed fixed income in [OO 05.1] • if Passive is reported, indicator [FI 14] will be applicable; and • if Active—quantitative and/or fundamental is reported, indicator [FI 01] will be applicable. In this indicator, you will be able to report different ESG incorporation strategies. Your selection(s) will determine which subsequent indicators will be applicable. Please see additional details in [FI 01].

OO FI 01	DEFINITIONS
Actively and passively managed strategies	
Active — quantitative (quant)	Investment strategies or funds for which the manager builds computer-based models to determine whether an investment is attractive. In a pure 'quant model', the model makes the final decision to buy or sell.
Active — fundamental and other active strategies	Fundamental strategies in which investment decisions are based on human judgment. This includes both bottom-up (e.g., stock-picking) and top-down (e.g., sector-based) strategies.
Passive	Passive investments are investments that mirror the performance of an index and follow a pre-determined buy and hold strategy that does not involve active forecasting. Examples include investments in broad capital market indices, ESG weighted indices, themed indices, passive managed ETFs or indices with ESG-based exclusions.

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OO FI 02	Indicator status MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	Purpose GATEWAY	Principle GENERAL

OO FI 02	INDICATOR				
OO FI 02.1	Indicate if you wish to report on your active strategies that represent less than 10% of your fixed income holdings.				
	Strategies	**SSA**	**Corporate (financial)**	**Corporate (non-financial)**	**Securitised**
	❑ Active — fundamental and other active strategies	❍ Yes ❍ No	❍ Yes ❍ No	❍ Yes ❍ No	❍ Yes ❍ No
OO FI 02.2	Additional information [OPTIONAL]				

OO FI 02	EXPLANATORY NOTES
OO FI 02	To find out more on how your peers have responded on this practice, view our analysis and visualisation in the fixed income interactive data report available on the Data Portal and the PRI website
OO FI 02.2	You can describe the reasons for reporting/not reporting your RI activities here.
LOGIC	
OO FI 02	If you select 'yes' for any active strategy, indicators [FI 01 to FI 12] will be applicable. If you select 'no' for active strategy indicators [FI 01 to FI 12] will not be applicable.

OO FI 02	DEFINITIONS
Active — quantitative (quant)	Investment strategies or funds for which the manager builds computer-based models to determine whether an investment is attractive. In a pure "quant model", the model makes the final decision to buy or sell.
Active — fundamental and other active strategies	Fundamental strategies in which investment decisions are based on human judgement. This includes both bottom-up (e.g., stock-picking) and top-down (e.g., sector-based) strategies.

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OO FI 03	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle GENERAL

OO FI 03	INDICATOR
OO FI 03.1	Indicate the approximate (+/- 5%) breakdown of your SSA investments by developed and emerging markets.

	SSA
Developed market (+/- 5%)	☐ %
Emerging market (+/- 5%)	☐ %
Total internally managed	**100%**

OO FI 03.2

Indicate the approximate (+/- 5%) breakdown of your corporate and securitised investments by investment grade or high-yield securities.

Type	Investment grade (+/- 5%)	High-yield (+/- 5%)	Total internally managed
Corp (financial)	❍>50%, ❍10-50%, ❍<10%, ❍ 0%	❍>50%, ❍10-50%, ❍<10%, ❍ 0%	**100%**
Corp (non-financial)	❍>50%, ❍10-50%, ❍<10%, ❍ 0%	❍>50%, ❍10-50%, ❍<10%, ❍ 0%	**100%**
Securitised	❍>50%, ❍10-50%, ❍<10%, ❍ 0%	❍>50%, ❍10-50%, ❍<10%, ❍ 0%	**100%**

OO FI 03.3

Additional information

[OPTIONAL]

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OO FI 03	EXPLANATORY NOTES
OO FI 03.1	This indicator has changed from "Mandatory to report, voluntary to disclose" to "Mandatory". Your response to this indicator will be published in the Public Transparency Report. This change to "Mandatory" will enable better analysis and peering Your organisation's breakdown of developed and emerging market fixed income investments will be used for aggregated reporting purposes only. To find out more on how your peers have responded on this practice, view our analysis and visualisation in the fixed income interactive data report available on the Data Portal and the PRI website
OO FI 03.2	Your organisation's breakdown of Investment Grade and High Yield fixed income investments will be used for aggregated reporting purposes only. Identifing whether fixed income investments are Investment Grade or High Yield: • Generally speaking, BBB- is the threshold between high-yield and investment grade. Any rating below can be considered High Yield, and above as Investment Grade. • If a bond has been rated by more than one rating agency, a good approach is to look at the average/median of the ratings (for instance if a particular bond is rated AAA, BBB- and BB, then the momentum is more around BB which stands for a high-yield bond). • The outlook of a rating is not really reliable because it can change at any time (upgrade or downgrade).
OO FI 03.3	You may include information about the predominant credit quality of your portfolio or funds (i.e., investment grade only) and details on the fixed income funds you manage (i.e., emerging market, long only, absolute return).
LOGIC	
OO FI 03	[OO FI 03] is applicable if you have SSA Fixed Income, and you have indicated that you wish to report on SSA in [OO 12.1] and [OO FI 02.1] [OO FI 03.1] is applicable if you have SSA Fixed Income, and you have indicated that you wish to report on SSA in [OO 12.1] and [OO FI 02.1] [OO FI 03.2] is applicable if you have indicated that you wish to report on any of the "Corporate (financial)", "Corporate (non-financial)" or "Securitised" Fixed Income types in [OO 12.1] and [OO FI 02.1].

OO FI 03	DEFINITIONS
Investment grade	Investment grade issue or issuer ratings are all ratings above BBB- or BAA- included.
High yield	Bonds issued by organisations that do not qualify for "investment-grade" ratings by one of the leading credit rating agencies. Also known as speculative grade.
Developed market	Based on MSCI's classification, the following countries are included in the developed market category: Australia, Austria, Belgium, Canada, Denmark, Finland, France, Germany, Greece, Hong Kong, Ireland, Israel, Italy, Japan, Netherlands, New Zealand, Norway, Portugal, Singapore, Spain, Sweden, Switzerland, United Kingdom and USA.
Emerging market	Based on MSCI's classification, the following countries are included in the emerging market category:

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	Brazil, Chile, China, Colombia, Czech Republic, Egypt, Hungary, India, Indonesia, Korea, Malaysia, Morocco, Mexico, Peru, Philippines, Poland, Russia, South Africa, Taiwan, Thailand, Turkey, Qatar and United Arab Emirates. Any other countries not listed above in the Developed Market category should be classified as an Emerging Market.

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OO SAM 01	Indicator status **MANDATORY TO REPORT** **VOLUNTARY TO DISCLOSE**	Purpose **GATEWAY**	Principle **GENERAL**

OO SAM 01	INDICATOR					
OO SAM 01.1	Provide a breakdown of your externally managed listed equities and fixed income by passive, active quant and active fundamental strategies.					
		Listed equity (LE)	**Fixed income —SSA**	**Fixed income — Corporate (financial)**	**Fixed income — Corporate (non-financial)**	**Fixed income — Securitised**
		As a % of externally managed listed equity/fixed income				
	Passive	%	%	%	%	%
	Active—quantitative (quant)	%	%	%	%	%
	Active—fundamental and other active	%	%	%	%	%
	Total externally managed listed equities/fixed income	**100%**	**100%**	**100%**	**100%**	**100%**
OO SAM 01.2	Additional information [OPTIONAL]					

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PRI Principles for Responsible Investment

OO SAM 01	EXPLANATORY NOTES
OO SAM 01.1	Your organisation's breakdown of passive, active quant and active fundamental by listed equities, fixed income SSA, corporate (financial), corporate (non-financial) and fixed income securitised will be used to trigger subsequent indicators on the ESG incorporation strategies used by your managers. Reported data will also be used in the assessment process to compare your organisation against those with a similar breakdown.
LOGIC	
OO SAM 01	[OO SAM 01] will be applicable if you reported any externally managed listed equity or fixed income in [OO 05.1] Your response to [OO SAM 01.1] determines which parts of indicator [SAM 01.1] are applicable; the SAM 01.1 indicator has Active and Passive investment strategy sections. For example, if you report using passive investment strategies in relation to Listed Equity in [OO SAM 01.1], you will only see the part of [SAM 01.1] that is relevant to passive investment strategies for Listed Equity.

SAM 01	DEFINITIONS
Actively and passively managed strategies	
Passive strategies	Passive investments are investments that mirror the performance of an index and follow a pre-determined buy and hold strategy that does not involve active forecasting. Examples include investments in broad capital market indices, ESG weighted indices, themed indices, passive managed ETFs or indices with ESG-based exclusions.
Active—quantitative (quant) strategies	Investment strategies or funds in which the manager builds computer-based models to determine whether an investment is attractive. In a pure 'quant model', the final decision to buy or sell is made by the model.
Active—fundamental	Fundamental strategies in which investment decisions are based on human judgement. This includes both bottom-up (e.g. stock-picking) and top-down (e.g. sector-based) strategies.

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OO PE 01	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle GENERAL

OO PE 01	INDICATOR	
OO PE 01.1	Provide a breakdown of your organisation's internally managed private equity investments by investment strategy.	
	Investment strategy	**Percentage of your internally managed private equity holdings (in terms of AUM)**
	Venture capital	❍>50%, ❍10-50%, ❍<10%, ❍ 0%
	Growth capital	❍>50%, ❍10-50%, ❍<10%, ❍ 0%
	(Leveraged) buy-out	❍>50%, ❍10-50%, ❍<10%, ❍ 0%
	Distressed/Turnaround/Special Situations	❍>50%, ❍10-50%, ❍<10%, ❍ 0%
	Secondaries	❍>50%, ❍10-50%, ❍<10%, ❍ 0%
	Other investment strategy; specify_____	❍>50%, ❍10-50%, ❍<10%, ❍ 0%
	Total	**100%**
OO PE 01.2	Additional information [OPTIONAL]	

OO PE 01	**EXPLANATORY NOTES**
OO PE 01.1	This indicator has changed from "Mandatory to report, voluntary to disclose" to "Mandatory". Your response to this indicator will be published in the Public Transparency Report. This change to "Mandatory" will enable better analysis and peering Compile the breakdown based on all your direct private equity investments as reported in the *Organisational Overview (OO)* module, indicator OO 05. You will be able to add up to two 'other investment strategy' rows.
LOGIC	
OO PE 01	[OO PE 01] will be applicable if you reported any internally managed private equity in [OO 05.1]

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OO PE 01	DEFINITIONS
Venture capital	Investments provided in equity form to start-up or emerging companies. This category includes seed and early stage capital.
Growth capital	Investments with a minority or majority stake in relatively mature companies at a critical stage in their development (e.g. to expand or restructure operations).
(Leveraged) buy-out	Refers to equity investments as part of transactions in which companies are acquired from the current shareholders with the use of financial leverage. The companies involved in these transactions are typically mature. Leveraged buyouts involve a financial sponsor agreeing to an acquisition without itself committing all the capital required for the acquisition. The financial sponsor will therefore also raise debt to fund the acquisition.
Distressed/Turnaround/Special situation	Investments in equity form to financially stressed companies. This includes "special situation" and "turnaround strategies" through rescue financing. Please note that investments via debt securities may be reported here if you feel the policies and procedures are largely similar to your other private equity investments. However, you may find the *Fixed Income Corporate (non-financial)* module more appropriate.
Secondaries	Refers to the acquisition of direct positions in operating companies from existing private equity investors, typically through portfolios. The acquisition of secondary interests in limited partnership investment funds should be reported in the Indirect—Manager Selection, Appointment and Monitoring (SAM) module".
Other	Other forms of private equity investments not listed

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OO PE 02	Indicator status MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	Purpose DESCRIPTIVE	Principle GENERAL

OO PE 02	INDICATOR
OO PE 02.1	Indicate the level of ownership you typically hold in your private equity investments.
	❍ a majority stake (>50%) ❍ 50% stake ❍ a significant minority stake (between 10-50%) ❍ a minority stake (<10%) ❍ a mix of ownership stakes
OO PE 02.2	Additional information [OPTIONAL]

OO PE 02	EXPLANATORY NOTES
OO PE 02.1	Select the option that represents your typical ownership stake in portfolio companies (consider 'typical' any number of your assets that constitutes more than 50% in any category). This will allow you to be allocated to peer groups with others with similar approaches. Select "a mix of ownership stakes" if your portfolio is diverse and does not have a typical level of ownership stake.
OO PE 02.2	This may include a discussion of: • your organisation's approach to private equity investment and role in transactions (i.e., when identifying and analysing potential investments, and investment monitoring post-investment); • differences in your approach in private equity investments in which you hold majority or minority stakes; and/or • if you wish, please include proportion of portfolio companies in which your organisation has a board seat(s).
LOGIC	
OO PE 02	[OO PE 02] will be applicable if you reported any internally managed private equity in [OO 05.1]

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OO PR 01	Indicator status MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	Purpose DESCRIPTIVE	Principle GENERAL

OO PR 01	INDICATOR
OO PR 01.1	Indicate the level of ownership you typically hold in your property investments. ❍ a majority stake (>50%) ❍ a 50% stake ❍ a significant minority stake (between 10-50%) ❍ a limited minority stake (<10%) ❍ a mix of ownership stakes ❍ N/A, we manage properties, new constructions and/or major renovations on behalf of our clients, but do not hold equity in property on their behalf.
OO PR 01.2	Provide a breakdown of your organisations allocation to Real Estate Investment Trusts (REITs) or similar ❍>50% ❍ 10 – 50% ❍ <10% ❍ 0%
OO PR 01.3	Additional information [OPTIONAL]

OO PR 01	EXPLANATORY NOTES
OO PR 01.1	Select the option that represents your typical ownership stake in properties (consider 'typical' as any number of your assets that constitutes more than 50% in any category). This will allow you to be allocated to a peer group with others with similar approaches. Select "a mix of ownership stakes" if your portfolio is diverse and does not have a typical level of ownership stake. *N/A option* Applicable for property managers involved in, for example, the day-to-day management of properties, supply of property performance data and advice to clients on investment decisions, but who do not make actual investment decisions on behalf of clients.

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OO PR 01.2	This may include a discussion of: • Your organisation's approach to property investment and its role in transactions (i.e., when identifying and analysing potential investments and investment monitoring post investment); • Differences in your approach in property investments in which you hold majority or minority stakes; and/or • The typical holding period of property investments.
LOGIC	
OO PR 01	[OO PR 01] will be applicable if you reported any internally managed property assets in [OO 05.1]

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OO PR 02	Indicator status MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	Purpose GATEWAY	Principle GENERAL

OO PR 02	INDICATOR	
OO PR 02.1	Provide a breakdown of your organisation's property assets based on who manages the assets.	
	Property assets managed by	**Breakdown of your property assets (by number)**
	Managed directly by your organisation	❍ >50%, ❍ 10-50%, ❍ <10%, ❍ 0%
	Managed via third-party property managers you appoint	❍ >50%, ❍ 10-50%, ❍ <10%, ❍ 0%
	Managed by other investors or their property managers	❍ >50%, ❍ 10-50%, ❍ <10%, ❍ 0%
	Managed by tenant(s) with operational control	❍ >50%, ❍ 10-50%, ❍ <10%, ❍ 0%
	Total	**100%**
OO PR 02.2	Additional information [OPTIONAL]	

OO PR 02	EXPLANATORY NOTES
OO PR 02.1	The definitions for" Property Management" have been aligned with GRESB 2016 guidance. 'Property management' refers in this context to the day-to-day operation and execution of decisions for property assets. It does not refer to investment decision-making (e.g., acquisition decisions). Directly managed assets are those for which your organisation is determined to have "operational control". If tenants or a single tenant has the greatest authority to introduce and implement operating policies and environmental policies, the tenant should be assumed to have operational control. If both you and the tenant have the authority to introduce and implement day-to-day operational procedures, the asset should be reported as directly managed.
OO PR 02.2	This may include a description of those involved in managing your organisation's properties.
LOGIC	
OO PR 02	[OO PR 02] will be applicable if you reported any internally managed property assets in [OO 05.1] If some proportion of your property assets is managed by third-party property managers, then indicator [PR 07] will be applicable.

OO PR 02	DEFINITIONS
Third-party property managers	Organisations that manage all types of property assets (e.g., retail, commercial and residential) for other organisations. They provide advice and support in a range of areas (e.g., facilities management, accounting, compliance, maintenance and utilisation).
Operational control	This is defined as having the ability to introduce and implement operating policies, health and safety policies and/or environmental policies.

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OO PR 03	Indicator status MANDATORY TO REPORT, VOLUNTARY TO DISCLOSE	Purpose DESCRIPTIVE	Principle GENERAL

OO PR 03	INDICATOR	
OO PR 03.1	Indicate up to three of your largest property types by AUM.	
	Types	**Main property types (by AUM)**
	❑ Largest property type	❑ Industrial ❑ Retail ❑ Office ❑ Residential ❑ Leisure/Hotel ❑ Mixed use ❑ Other; specify _____
	❑ Second largest property type	[same as above]
	❑ Third largest property type	[same as above]
OO PR 03.2	Additional information	

OO PR 03	EXPLANATORY NOTES
OO PR 03.1	Determine the main property types by internally managed property assets under management. This will help contextualise your reported information in the rest of this module. The options in this indicator are complementary to GRESB indicator RC5.1 in the 'Reporting Characteristics' section of the 2016 GRESB assessment.
OO PR 03.2	This may include a discussion of: • Typical property types, breakdown between single and multi-let, number of properties and types of tenants; • The proportion within your organisation's overall property portfolio accounted for by individual property types; and/or • Typical breakdown of property investments between greenfield and brownfield assets. Please refer to the *Organisational Overview (OO)*, indicator OO 09, if your organisation has a significant focus on property and has described its typical property investments in this indicator.
LOGIC	
OO PR 03	[OO PR 03] will be applicable if you reported any internally managed property assets in [OO 05.1]

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OO PR 03	DEFINITIONS
Industrial	Includes distribution warehouses, storage, garages and logistics centres
Retail	Includes high street and out-of-town malls, individual retail stores, retail parks
Office	Includes office buildings and serviced offices
Residential	Includes multiple occupancy buildings
Leisure/Hotel	Includes hotels, sports facilities and restaurants
Mixed use	Property which combines one or more of the above uses

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OO INF 01	Indicator status MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	Purpose DESCRIPTIVE	Principle GENERAL

OO INF 01	INDICATOR
OO INF 01.1	Indicate the level of ownership you typically hold in your infrastructure investments. ❍ a majority stake (>50%) ❍ a 50% stake ❍ a significant minority stake (between 10–50%) ❍ a minority stake (<10%) ❍ a mix of ownership stakes
OO INF 01.2	Additional information [OPTIONAL]

OO INF 01	EXPLANATORY NOTES
OO INF 01.1	Select the option that represents your typical ownership stake in companies (consider 'typical' as any number of your assets that constitutes more than 50% in any category). Select "a mix of ownership stakes" if your portfolio is diverse and does not have a typical level of ownership stake.
OO INF 01.2	You may include a discussion of: • your organisation's approach to infrastructure investment and role in transactions (i.e., when identifying and analysing potential investments and investment monitoring post-investment); • differences in your approach in infrastructure investments in which you hold majority or minority stakes; and • the typical holding period of infrastructure investments and how this affects your approach to ESG issues
LOGIC	
OO INF 01	[OO INF 01] will be applicable if you reported any internally managed infrastructure assets in [OO 05.1]

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OO INF 02	Indicator status MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	Purpose GATEWAY/PEERING	Principle GENERAL

OO INF 02	INDICATOR	
OO INF 02.1	Provide a breakdown of your organisation's infrastructure assets based on who manages the assets.	
	Infrastructure assets managed by	**Breakdown of your infrastructure assets (by number)**
	Managed directly by your organisation/companies you owned	❍ >50%, ❍ 10-50%, ❍ <10%, ❍ 0%
	Managed via third-party operators appointed by your organisation/companies you owned	❍ >50%, ❍ 10-50%, ❍ <10%, ❍ 0%
	Managed by other investors/their third-party operators	❍ >50%, ❍ 10-50%, ❍ <10%, ❍ 0%
	Total	**100%**
OO INF 02.2	Additional information [OPTIONAL]	

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OO INF 02	EXPLANATORY NOTES
OO INF 02.1	'Infrastructure management' refers in this context to the day-to-day operation and execution of decisions for infrastructure assets. It does not refer to investment decision-making (e.g., acquisition decisions). 'Managed directly by your organisation/companies owned by you' refers to either an internal team that operates externally to manage the infrastructure asset and/or companies that control the operations of infrastructure assets in which your organisation has ownership. 'Managed via third-party operators appointed by organisation/companies you owned' refers to appointed third-party operators not owned by your organisation that have their own management and operating staff in place for infrastructure assets in which your organisation has ownership. 'Managed by other investors/their third-party operators' is often applicable if you have minority stakes in infrastructure assets. The option also captures cases in which co-investors or backers (e.g., governments) have appointed third-party organisations. This indicator is applicable only if your organisation has equity stakes in infrastructure assets.
OO INF 02.2	This may include a description of those involved in managing your organisation's infrastructure investments.
LOGIC	
OO INF 02	[OO INF 02] will be applicable if you reported any internally managed infrastructure assets in [OO 05.1] If some proportion of your infrastructure assets are managed by third-party operators, appointed by your organisation and/or companies you owned, then indicator [INF 10] will be applicable.

OO INF 02	DEFINITIONS
Third-party operators	Organisations that manage or maintain all types of infrastructure assets (e.g., highway, airports, etc.) for other organisations.

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OO INF 03	Indicator status MANDATORY TO REPORT, VOLUNTARY TO DISCLOSE	Purpose DESCRIPTIVE	Principle GENERAL

OO INF 03	INDICATOR	
OO INF 03.1	Indicate up to three of your largest infrastructure sectors by AUM.	
	Sector	**Main infrastructure sectors (by AUM)**
	❑ Largest infrastructure sector	❑ Transportation ❑ Energy infrastructure ❑ Conventional energy ❑ Renewable energy ❑ Water management ❑ Waste management ❑ Communication ❑ Social infrastructure ❑ Other; specify _____
	❑ Second largest infrastructure sector	[same as above]
	❑ Third largest infrastructure sector	[same as above]
OO INF 03.2	Additional information	

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OO INF 03	EXPLANATORY NOTES
OO INF 03.1	Determine the main infrastructure sectors by internally managed infrastructure assets under management. This will help contextualise your reported information in the rest of this module.
OO INF 03.2	This may include a discussion of: • typical infrastructure types and number of individual investments; • the proportion within your organisation's overall infrastructure portfolio accounted for by individual infrastructure sectors; and/or • typical breakdown of infrastructure investments between greenfield and brownfield assets. Please refer to the *Organisational Overview (OO)* module, indicator OO 09, if your organisation has a significant focus on infrastructure and has already described its typical infrastructure investments in this indicator.
LOGIC	
OO INF 03	[OO INF 03] will be applicable if you reported any internally managed infrastructure assets in [OO 05.1]

OO INF 03	DEFINITIONS
Transportation	Includes roads and tunnels, airports, ports, rail
Energy infrastructure	Includes electricity transmission and distribution, gas transmission and distribution, liquid and gas storage, other energy infrastructure
Conventional energy	Includes coal, gas, shale gas, oil, nuclear
Renewable energy	Includes solar, wind, hydro, wave power, tidal, biomass
Water management	Includes water treatment facilities, sewer lines
Waste management	Includes landfill, incineration, recycling, waste collection, recovery
Communication	Includes telecom towers, cable networks, broadcast networks and transmissions
Social infrastructure	Includes health-care facilities, education, aged care, prison, social purpose

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OO HF 01	Indicator status MANDATORY TO REPORT, VOLUNTARY TO DISCLOSE	Purpose DESCRIPTIVE	Principle GENERAL

OO HF 01	INDICATOR		
OO HF 01.1	Please describe your hedge fund strategies and classification		
	Options presented for hedge funds:		
	Main strategy	**Strategy as % hedge fund AUM**	**Sub-strategy**
	Equity Hedge	❍ >50%, ❍ 10-50%, ❍ <10%, ❍ 0%	❑ Equity Market Neutral ❑ Fundamental Growth ❑ Fundamental Value ❑ Quantitative Directional ❑ Sector: Energy/Basic Materials ❑ Sector: Healthcare ❑ Sector: Technology ❑ Short Bias ❑ Multi-Strategy
	Event Driven	❍ >50%, ❍ 10-50%, ❍ <10%, ❍ 0%	❑ Activist ❑ Credit Arbitrage ❑ Distressed / Restructuring ❑ Merger Arbitrage ❑ Private Issue / Regulation D ❑ Special Situations ❑ Multi-Strategy
	Global Macro	❍ >50%, ❍ 10-50%, ❍ <10%, ❍ 0%	❑ Active Trading ❑ Commodity: Agriculture ❑ Commodity: Energy ❑ Commodity: Metals ❑ Commodity: Multi ❑ Currency: Discretionary ❑ Currency: Systematic ❑ Discretionary Thematic ❑ Systematic Diversified ❑ Multi-Strategy

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	Relative Value	❍ >50%, ❍ 10-50%, ❍ <10%, ❍ 0%	❑ Fixed Income - Asset Backed ❑ Fixed Income - Convertible Arbitrage ❑ Fixed Income - Corporate ❑ Fixed Income - Sovereign ❑ Volatility ❑ Yield Alternatives: Energy Infrastructure ❑ Yield Alternatives: Real Estate ❑ Multi-Strategy
	Risk parity	❍ >50%, ❍ 10-50%, ❍ <10%, ❍ 0%	❑ Volatility Target: 10% ❑ Volatility Target: 12% ❑ Volatility Target: 15%
	Blockchain	❍ >50%, ❍ 10-50%, ❍ <10%, ❍ 0%	❑ Cryptocurrency ❑ Infrastructure
		Total 100% (of internal hedge fund AUM)	
	Options presented for fund of hedge funds:		
	Main strategy	**Strategy as % fund of hedge fund AUM**	**Sub-strategy**
	Fund of Hedge Funds	❍ >50%, ❍ 10-50%, ❍ <10%, ❍ 0%	❑ Conservative
		❍ >50%, ❍ 10-50%, ❍ <10%, ❍ 0%	❑ Diversified
		❍ >50%, ❍ 10-50%, ❍ <10%, ❍ 0%	❑ Market Defensive
		❍ >50%, ❍ 10-50%, ❍ <10%, ❍ 0%	❑ Strategic
		Total 100% (of internal fund of hedge fund AUM)	
OO HF 01.2	Additional information [OPTIONAL]		

OO HF 01	**EXPLANATORY NOTES**
OO HF 01.1	Please select an option from the HFR Hedge Fund Strategy Classification System.

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LOGIC	
OO HF 01	OO HF 01.1 is applicable if any value for "Hedge funds" or "Fund of hedge funds" is reported in OO 05 (Internally managed) OO HF 01.1 has different tickbox options presented depending on whether "Hedge Fund" and/or "Hedge Fund of Funds" were reported in OO 05.

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PRI REPORTING FRAMEWORK 2019
Strategy and Governance

November 2018

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UNEP Finance Initiative
Changing finance, financing change

United Nations Global Compact

An investor initiative in partnership with UNEP Finance Initiative and UN Global Compact

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), the purpose of the indicator, and which PRI Principle it relates to.

	Indicator status	Purpose	Principle
xxx 01	*MANDATORY*	*CORE ASSESSED*	*PRI 2*

Indicator status

MANDATORY	Mandatory indicators reflect core practices. These responses will be made public and must be completed to submit the framework.
MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	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.
VOLUNTARY	Voluntary indicators reflect alternative or advanced practices. These indicators are voluntary to report and disclose.

Purpose

Gateway	These 'unlock' other indicators within a module if they are relevant for your organisation. Please refer to the logic box for more information.
Peering	These determine your peer groups for assessment purposes.
Core assessed	These indicators form the core of the assessment and represent the majority of your final assessment score.
Additional assessed	These indicators represent more advanced or alternative practices and contribute to a smaller part of your score.
Descriptive	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	**EXPLANATORY NOTES**
xxx 01.1	This provides guidance on how to interpret the sub-indicators, including examples of what could be reported.
xxx 01.2	
LOGIC	
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.
ASSESSMENT	
xxx 01	This provides a brief overview of the pilot assessment approach for this indicator.

xxx 01	**DEFINITIONS**
xxx 01	Specific terms that are used in the indicator are defined here.

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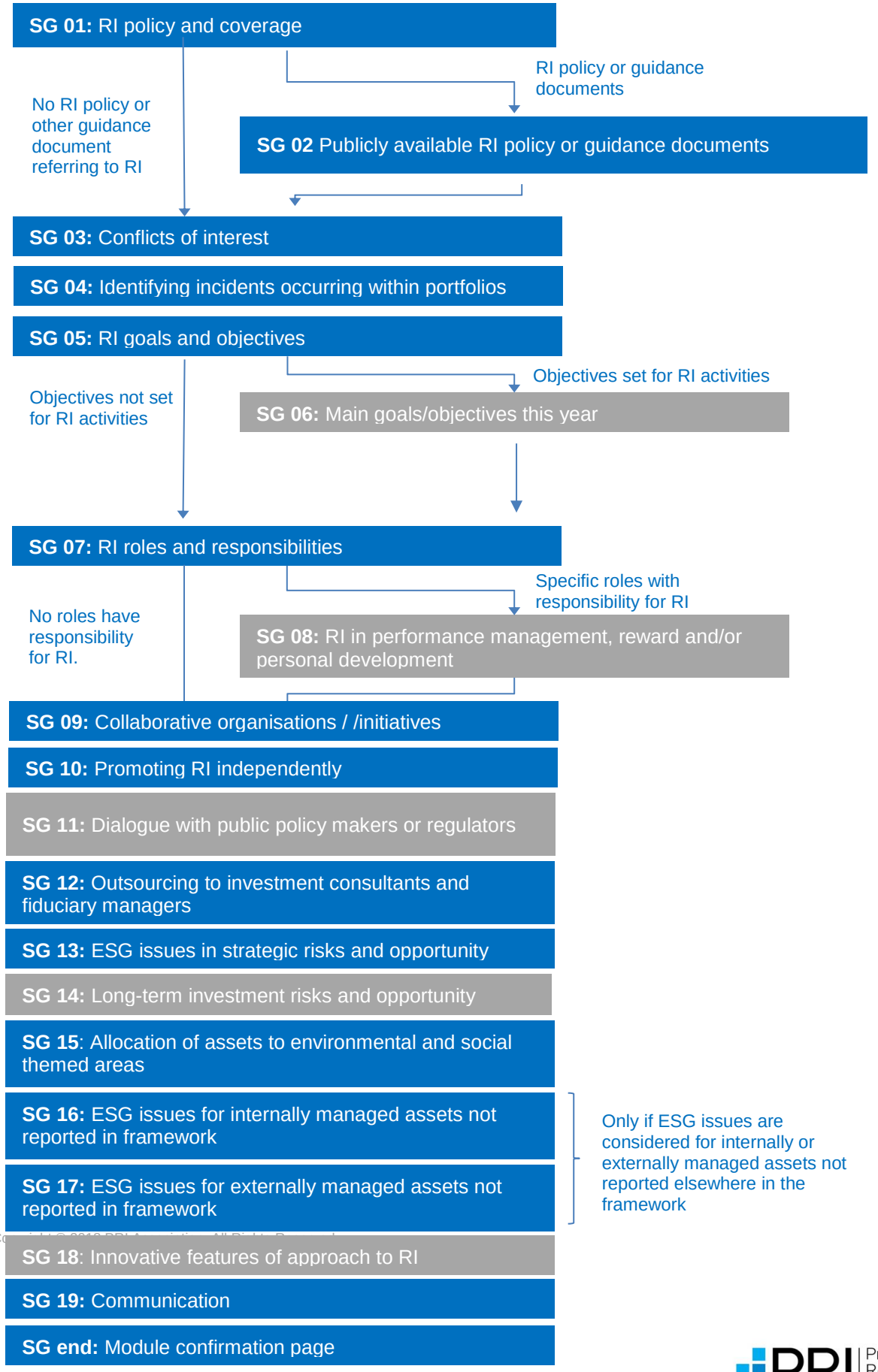
Pathways through the module



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PRI Principles for Responsible Investment

Preface

The information reported in this module will enable your stakeholders to understand your organisation's overarching approach to responsible investment (i.e., your governance, your responsible investment policy, objectives and targets, the resources you allocate to responsible investment and your approach to collaboration on responsible investment and public policy-related issues) and the incorporation of ESG issues into asset allocation.

Summary of updates

2018 Indicator	Update summary
SG 01	Options added and/or amended. Question reformulated.
SG 02	Options added. Sub-indicators removed and renumbered.
SG 06	Option added.
SG 07	Question reformulated and options amended and/or removed.
SG 08	Indicator restructured, and options amended and/or removed.
SG 09	Option has been updated and question reformulated.
SG 12	Definition added.
SG 13	Options removed, amended and/or reworded.
SG 14	Sub-indicator has been removed. Options have been added and reworded.
SG 15	Sub-indicator status has changed and thematic areas and definitions have been aligned with the PRI impact investing market map. Sub-indicator has been added.
SG 18	Additional information removed.
SG 19	Reworded and assessment explanatory notes restructured.

To view a detailed summary of changes to the module, please click here.

For any word limit in the module, please click here.

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SECTION

Investment Policy

SG 01	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle GENERAL

SG 01	INDICATOR	
SG 01.1	Indicate if you have an investment policy that covers your responsible investment approach.	
	❍ Yes	❍ No
SG 01.2	Indicate the components/types and coverage of your policy	
	Policy components/types	**Coverage by AUM**
	❑ Policy setting out your overall approach ❑ Formalised guidelines on environmental factors ❑ Formalised guidelines on social factors ❑ Formalised guidelines on corporate governance factors ❑ Fiduciary (or equivalent) duties ❑ Asset class-specific RI guidelines ❑ Sector-specific RI guidelines ❑ Screening/exclusions policy ❑ Engagement policy ❑ (Proxy) voting policy ❑ Other, please specify (1)_____ ❑ Other, please specify (2)_____	❍ Applicable policies cover all AUM ❍ Applicable policies cover a majority of AUM ❍ Applicable policies cover a minority of AUM
SG 01.3	Indicate if the investment policy covers any of the following:	
	❑ Your organisation's definition of ESG and/or responsible investment and its relation to investments ❑ Your investment objectives that take ESG factors/real economy influence into account ❑ Time horizon of your investment ❑ Governance structure of organisational ESG responsibilities ❑ ESG incorporation approaches ❑ Active ownership approaches ❑ Reporting ❑ Climate change ❑ Understanding and incorporating client / beneficiary sustainability preferences ❑ Other RI considerations, specify (1) _____	

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	❑ Other RI considerations, specify (2) _____
SG 01.4	Describe your organisation's investment principles and overall investment strategy, interpretation of fiduciary (or equivalent) duties, and how they consider ESG factors and real economy impact.
SG 01.5	Provide a brief description of the key elements, any variations or exceptions to your investment policy that covers your responsible investment approach. [OPTIONAL]
SG 01.6	Additional information [OPTIONAL]

SG 01	**EXPLANATORY NOTES**
SG 01	**The indicators [SG 01.1] & [SG 01.5] are aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations.** To find out more on how your peers have responded on this practice, view our analysis and visualisation in the asset owner interactive data report available on the Data Portal and the PRI website.

SG 01.1	'Investment policy' here refers to an overall statement that actualises the approach on how your organisation will achieve its identified mission, and will build on your investment strategy, outline your investment objectives, and give guidance to investment processes as well as your standards for measuring success/performance. Responsible investment policies can take many forms, including high-level statements on an organisation's webpage, a code, communications on a separate responsible investment policy, a range of policies that cover different areas, or can be incorporated into an organisation's Investment Policy Statement.
	For the 'policy' to cover your responsible investment approach, the statement may include some of the following components;
	• **Core responsible investment guidelines.** These can include;
	  ○ Minimum ESG standards for investee companies.
	  ○ Guidelines and procedures for RI practices across different asset classes.
	  ○ Guidelines for working with external managers.
	• **Which responsible investment approaches you will implement**, e.g. positive and negative screening, ESG integration into investment analysis, and themed investing
	• **Guidelines on what ownership activities you will employ or prioritise** (if applicable). Examples include:
	  ○ Voting, including AGM participation and proxy voting.
	  ○ Which companies to target and how to measure success.
	  ○ Which ownership activities you may take, e.g. voting, engagement, raising shareholder resolutions, and/or request a seat on the board.
	• **Your approach to reporting**, including level of publicity and internal review processes.

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	A statement with the above components will hereby be referred to as an 'RI Policy'. For more guidance on how to write a RI policy, click here.
SG 01.2	*Policy components/types* The policies listed here may be contained in a single document or multiple separate documents. You may therefore be able to tick multiple boxes. • Select 'formalised guidelines on RI in asset classes' if you have specific policy statement(s) covering issues in individual asset class(es). • Select 'engagement policy' if your policy refers to any active ownership activities you conduct in your listed/non-listed asset classes excluding (proxy) voting. • Select 'formalised guidelines on corporate governance factors' or 'formalised guidelines on environmental and social factors' if your policy explicitly references guidelines and/or processes on how to address E, S, and/or G issues in your investment process and in your approach to ESG incorporation and active ownership. If you have a policy on managing potential conflicts of interest, this should be reported in SG 03 and not as an 'Other' option in SG 01.2. To learn more about why failing to consider long-term investment value drivers – including ESG issues – in investment practice is a failure to fulfil your fiduciary duty, read PRI's publication Fiduciary duty in the 21st century and the country specific recommendations. *Coverage by AUM* Some policies might apply in principle to all asset classes while being implemented in different ways in different contexts. Policies on (proxy) voting and those that relate to specific asset classes (e.g., covering issues specific to property or hedge funds) obviously do not apply to all asset classes. For example, a (proxy) voting policy might cover all listed equity assets, but in relation to all AUM, it only represents 30%. In this case, you should still select the 'Applicable policies cover all AUM' option. Some general policies that are not in themselves specific to an individual asset class might in practice not be implemented in certain asset classes or certain parts of certain asset classes. For example, an investor might choose not to undertake engagement with companies in particular markets.
SG 01.3	This section does not focus on policies covering office or operational management (e.g., recycling) or other matters not related to investment activities (e.g., corporate philanthropy). • Select 'Your organisation's definition of ESG and/or responsible investment and its relation to investments' if you set an objective for measuring ESG risk factors in your portfolio and/or define what success looks like for a well-executed ESG strategy. • Select 'Your investment objectives that take ESG factors/real economy influence into account' if you have developed a set of investment objectives for your investments that take ESG factors into account. For example, this could be done through a risk, return, real economy influence and longer time horizon perspective. • Select 'Governance structure of organisational ESG responsibilities' if you cover accountability and responsibilities in regards to the implementation of the investment policy. • Select 'ESG incorporation approaches' if you cover specific ESG approaches as the means to achieve the investment objectives in your policy sections. Refer to PRI's discussion paper *Crafting an Investment Strategy – A Process Guidance for Asset Owners* that can provide additional support to asset owners in the development of a clear and explicit investment strategy.

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	To find out more on how your peers have responded on this practice, view our analysis and visualisation in the climate change interactive snapshot report available on the Data Portal and the PRI website.
SG 01.4	This indicator gives you the opportunity to provide details of your organisation's investment principles and overall investment strategy and comment on the strategy aspects such as • ESG factors, • real economy influence, • time horizon etc. • and how these aspects have influenced and are incorporated in the strategy The indicator also allows you to report on how you interpret the duties owed to beneficiaries and clients, with respect to the integration of ESG factors, the time horizon of investment activity and the integration of the sustainability preferences of beneficiaries and clients.

SG 01.5	This indicator gives you the opportunity to provide a broad overview of your responsible investment policy, and to comment on issues such as:
	• your motivation for pursuing responsible investment. This might include one or more of the following:
	  ○ to improve the financial performance of your investments;
	  ○ to promote the accountability of investee companies to shareholders;
	  ○ to promote sustainable capital markets and reduce systemic risks through your investments;
	  ○ to uphold values or ethical standards or to promote compliance with international law, codes or guidelines; and/or
	  ○ to promote change in public policy relating to ESG issues;
	• the scope of the policy;
	• who approved the policy;
	• when the policy was adopted and how frequently it is reviewed;
	• any significant exceptions to the policy;
	• how the policy is implemented; and
	• the specific ESG issues covered by the policy. You may for example wish to describe how your policy covers climate change or other ESG themes.

LOGIC	
SG 01	[SG 02] will unlock if you report 'Yes' in [SG 01.1]
ASSESSMENT	
SG 01	Your assessment will be based on your responses to [SG 01.1] and [SG 01.2].
	Indicator scoring methodology
	Selected response | **Level score** | **Further Details**
	Policy Components

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	No RI policy	⚬	
	One selection in policy component covering majority/all AUM OR Two selections covering minority of AUM	★	
	Two selections covering majority/all AUM OR Three or more selections covering minority AUM	★★	
	Three or more selections covering majority/all AUM	★★★	At least one of the following answer choices "Policy setting out your overall approach", "Formalised guidelines on environmental factors", "Formalised guidelines on social factors" and "Formalised guidelines on corporate governance factors" should be selected to get 3 stars.

SG 01	DEFINITIONS
Investment policy	'Investment policy' here refers to an overall statement that actualises the approach on how your organisation will achieve its identified mission, and will build on your investment strategy, outline your investment objectives, and give guidance to investment processes as well as your standards for measuring success/performance. The investment policy will also cover your approach to responsible investment, or ESG issues, in your investment activities.
Real economy influence	Real Economy Influence is the extent to which an investment positively or negatively impacts the real economy, including environment, social, and governance impacts, additionally to financial return.
Investment strategy	A high level strategic plan which embeds comprehensive consideration of all long-term trends affecting your portfolios and how to operate as efficiently as possible for the benefit of your stakeholders.
Investment principles	(also referred to as investment beliefs) A set of clear, impactful statements that will help to define your investment strategy and, later on, help to make investment decisions in line with that strategy.

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SG 02	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 6

SG 02	INDICATOR		
SG 02.1	Indicate which of your investment policy documents (if any) are publicly available. Provide a URL and an attachment of the document.		
	Policy or document name	**URL**	**Attachment** [OPTIONAL]
	❑ Policy setting out your overall approach		
	❑ Formalised guidelines on environmental factors		
	❑ Formalised guidelines on social factors		
	❑ Formalised guidelines on corporate governance factors		
	❑ Fiduciary (or equivalent) duties		
	❑ Asset class-specific RI guidelines		
	❑ Sector specific RI guidelines		
	❑ Screening/exclusions policy		
	❑ Engagement policy		
	❑ (Proxy) voting policy		
	❑ Other, please specify (1)_____		
	❑ Other, please specify (2)_____		
	❑ We do not publicly disclose our investment policy documents		
SG 02.2	Indicate if any of your investment policy components are publicly available. Provide a URL and an attachment of the document		
	Policy components	**URL**	**Attachment** [OPTIONAL]
	❑ Your organisation's definition of ESG and/or responsible investment and its relation to investments		
	❑ Your investment objectives that take ESG factors/real economy influence into account		
	❑ Time horizon of your investment		
	❑ Governance structure of organisational ESG responsibilities		
	❑ ESG incorporation approaches		

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	❑ Active ownership approaches		
	❑ Reporting		
	❑ Climate change		
	❑ Understanding and incorporating client / beneficiary sustainability preferences		
	❑ Other, please specify (1) _____		
	❑ Other, please specify (2) _____		
	❑ We do not publicly disclose any investment policy components		
SG 02.3	Additional information. [OPTIONAL]		

SG 02	**EXPLANATORY NOTES**
SG 02	**The indicator [SG 02.1] is aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations.** To find out more on how your peers have responded on this practice, view our analysis and visualisation in the asset owner interactive data report available on the Data Portal and the PRI website.
SG 02.3	If your responsible investment policy or your 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.
LOGIC	
SG 02	Indicator [02.1] and [02.2] are applicable if you reported that your organisation has a responsible investment policy in [01.1] Only the options selected in [01.2] will be presented in [02.1], and only the options selected in [01.3] will be presented in [02.2].
ASSESSMENT	
SG 02	Maximum score: Three ★ Your assessment will be based on your responses to [02.1].

Indicator scoring methodology	
Selected response	**Level score**
'We do not publicly disclose our investment policy documents'	⭘
Publicly disclose some documents	★★
Publicly disclose all documents	★★★

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SG 03	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle GENERAL

SG 03	INDICATOR	
SG 03.1	Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.	
	❍ Yes	❍ No
SG 03.2	Describe your policy on managing potential conflicts of interest in the investment process.	
SG 03.3	Additional information. [OPTIONAL]	

SG 03	EXPLANATORY NOTES
SG 03	**The indicator [SG 03.1] is aligned with the ICGN Global Stewardship Principles.** 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. This may relate to either the investment management business or other parts of the business. A conflict of interest may sometimes arise in connection with a responsible investment matter. For example, acting in the interests of clients may indicate that an investor should choose to vote against management at a company or engage with that company; however, the pension fund of that company, or the company itself, may also be a client or potential client of the investor or another part of the investor's parent organisation. In some markets investors are required under regulation or codes of good practice to have such policies in place. Examples include the US, the UK and South Africa.
LOGIC	
SG 03	[SG 03.2] will be applicable if 'Yes' is reported in [SG 03.1]
ASSESSMENT	
SG 03	Maximum score: Three ★ The assessment of this indicator is based on your responses to [SG 03.1].
	Indicator scoring methodology

Selected response	Level score
'No'	⭘
'Yes'	★★★

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SG 04	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle GENERAL

SG 04	INDICATOR	
SG 04.1	Indicate if your organisation has a process for identifying and managing incidents that occur within portfolio companies.	
	❍ Yes	❍ No
SG 04.2	Describe your process on managing incidents	

SG 04	EXPLANATORY NOTES
SG 04.2	You may want to describe how you define, identify and respond to ESG incidents in your portfolio, how do you report on these to your clients/beneficiaries and what policies you have in place to manage the incidents. This indicator is not capturing information on incidents in your own operations. You can also provide detail on the incidents that took place in the reporting year, the type of the incidents and provide examples of your management, mitigation and reporting strategies. For example, an incident would be a bribery scandal, a safety accident etc. in the portfolio company.

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SECTION

Objectives and strategies

SG 05	Indicator status MANDATORY	Purpose GATEWAY/CORE ASSESSED	Principle GENERAL

SG 05	INDICATOR					
SG 05.1	Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.					
	❍ Quarterly or more frequently	❍ Biannually	❍ Annually	❍ Less frequently than annually	❍ Ad-hoc basis	❍ It is not set/reviewed
SG 05.2	Additional information. [OPTIONAL]					

SG 05	EXPLANATORY NOTES
SG 05	For examples of possible objectives, please see the guidance notes for indicator [07], which allows you to describe your objectives in more detail. PRI recognises that long-term objectives do not typically change on a frequent basis. If this is the case, please select how often you review your progress to make sure the goal remains relevant.
LOGIC	
SG 05	[SG 06] will be applicable if anything other than 'It is not reviewed' is selected in [SG 05.1]
ASSESSMENT	
SG 05	Maximum score: Three ★ This indicator assesses if objectives have been set and how often they are revised in [SG 05.1]

Indicator scoring methodology	
Selected response	**Level score**
'It is not set/reviewed'	⭘
'Ad-hoc basis' or 'Less frequently than annually'	★★
'Annually', 'Biannually', or 'Quarterly or more frequently'	★★★

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PRI Principles for Responsible Investment

SG 06	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle GENERAL

SG 06	INDICATOR			
SG 06.1	List the main responsible investment objectives that your organisation set for the reporting year			
	Topics	**Responsible investment objectives**	**Key performance indicator**	**Progress achieved**
	Responsible investment processes	❑ Provide training on ESG incorporation		
		❑ Provide training on ESG engagement		
		❑ Improved communication of ESG activities within the organisation		
		❑ Improved engagement to encourage change with regards to management of ESG issues		
		❑ Improved ESG incorporation into investment decision making processes		
		❑ Other, specify (1)		
		❑ Other, specify (2)		
		❑ Other, specify (3)		
		❑ None of the above		
	Financial performance of investments	❑ Increased portfolio performance by consideration of ESG factors		
		❑ Other, specify (1)		
		❑ Other, specify (2)		
		❑ Other, specify (3)		
		❑ None of the above		
	ESG characteristics of investments	❑ Over or underweight companies based on ESG characteristics		
		❑ Improved ESG ratings of portfolio		
		❑ Setting carbon reduction targets for portfolio		
		❑ Other, specify (1)		
		❑ Other, specify (2)		

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		❑ Other, specify (3)		
		❑ None of the above		
	Other activities	❑ Joining and/or participating in RI initiatives		
		❑ Encouraging others to join a RI initiative		
		❑ Documentation of best practice case studies		
		❑ Using case studies to demonstrate engagement and ESG incorporation to clients		
		❑ Other, specify (1)		
		❑ Other, specify (2)		
		❑ Other, specify (3)		
		❑ None of the above		
SG 06.2	Additional information. [OPTIONAL]			

SG 06	EXPLANATORY NOTES
SG 06	The responsible investment objectives that organisations may set for themselves may relate to: Responsible investment processes: e.g., to better record engagement activities; here a key performance indicator could be the establishment of a new database Financial performance of their investments – e.g., to increase portfolio performance by over-underweighting companies with particular ESG characteristics; here a key performance indicator could be the change in price of the shares of those companies ESG characteristics of investments – e.g., to engage with companies in order to persuade them to make a specific change to their management of ESG issues; the KPI here would be the introduction of this change. This could also include any efforts to tackle climate change in your investments (such as measuring your portfolio's carbon footprint etc.) Other activities - e.g., to participate in a particular collaborative initiative; the KPI in this case would be participation in the initiative; or Capacity and resources - e.g., to provide ESG training to investment staff; here the KPI could be the delivery of training
LOGIC	
SG 06	[SG 06] will be applicable if anything other than 'It is not reviewed' is selected in SG 05.1

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SECTION

Governance and human resources

SG 07	Indicator status	Purpose	Principle
	MANDATORY	CORE ASSESSED	GENERAL

SG 07	INDICATOR				
SG 07.1	Indicate the internal and/or external roles used by your organisation, and indicate for each whether they have oversight and/or implementation responsibilities for responsible investment.				
	Roles		Oversight/ accountability for RI	Implementation of RI	No responsibility for RI
	❑ Board members or trustees		❑	❑	❑
	Internal roles	❑ Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee	❑	❑	❑
		❑ Other chief-level staff or head of department, specify_____	❑	❑	❑
		❑ Portfolio managers	❑	❑	❑
		❑ Investment analysts	❑	❑	❑
		❑ Dedicated responsible investment staff	❑	❑	❑
		❑ Investor relations	❑	❑	❑
		❑ Other role, specify (1)_____	❑	❑	❑
		❑ Other role, specify (2)_____	❑	❑	❑
	❑ External managers or service providers		❑	❑	❑

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SG 07.2	For the roles for which you have RI oversight/accountability or implementation responsibilities, indicate how you execute these responsibilities. [OPTIONAL]
SG 07.3	Indicate the number of dedicated responsible investment staff your organisation has.
SG 07.4	Additional information. [OPTIONAL]

SG 07	**EXPLANATORY NOTES**
SG 07	**The indicator [SG 7.1] is aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations.** **The indicators [SG 7.1] and [SG 7.3] are aligned with the ICGN Global Stewardship Principles.** This indicator relates to activities that are carried out in-house and activities that are carried out by third parties on your behalf (e.g., vote execution, research). In the left column, please highlight what type of roles you have in your organisation, irrespective of whether they have oversight/accountability or implementation responsibility for responsible investment. *Oversight and implementation are differentiated as follows.* Individuals with **oversight** 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 responsible investment performance. Assigning oversight to a person, team or committee should not be seen as a way to compartmentalise ESG oversight. Instead, the purpose is to ensure accountability for embedding ESG considerations within the organisation and investment processes. Individuals with **implementation** roles are those charged with implementing specific aspects of the organisation's responsible investment practices, for example, conducting ESG-related research, incorporating ESG issues into investment strategies, voting shareholdings, engaging with companies and policy-makers. Implementation of responsible investment does not only apply to dedicated RI/ESG staff and could be a part of any roles activities. As is relevant to the manner in which your organisation oversees its responsible investment activities, this could include a discussion of: • the roles and responsibilities of your board and senior management; • formal oversight or consultative bodies (e.g., client/beneficiary/external specialist advisory groups); • who has day-to-day responsibility for your responsible investment activities; and • how responsible investment performance is assessed and reviewed. This information could include an organisational chart.

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LOGIC	
SG 07.1	If you report here that individuals within your organisation have oversight/accountability or implementation roles in relation to responsible investment, the parts of indicator [07.1] that relate to these roles will be applicable. The roles you select in SG 07.1 will appear in SG 08.1

ASSESSMENT		
SG 07	Maximum score: Three ★ This indicator assesses whether your organisation has an individual with oversight/accountability for RI and an individual implementing RI. It is not necessary to have all the positions listed to receive the full score, and no distinction in terms of score is made between implementation by dedicated RI staff and other internal/external roles.	
	Indicator scoring methodology	
	Selected response	**Level score**
	No implementation responsibility for RI	○
	Implementation at any level but no oversight	★
	Oversight at a level below Board, CEO, CIO or Investment Committee level AND implementation at any level	★★
	Oversight at Board, CEO, CIO or Investment Committee level AND implementation at any level	★★★

SG 07	DEFINITIONS
Dedicated responsible investment staff	Dedicated responsible investment/ESG staff are those individuals with the majority of their time allocated to responsible investment/ESG activities (either oversight or implementation).

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SG 08	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle GENERAL

SG 08	INDICATOR		
SG 08.1	Indicate if your organisation's performance management, reward and/or personal development processes have a responsible investment element.		
	Roles [pre-filled from SG 07]	**SG 08.1a: RI in objectives, appraisal and/or reward**	**SG 08.1b: RI in personal development and/or training plan**
	Board members or trustees	n/a	❑ RI in personal development and/or training plan ❑ None of the above
	Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee	❑ RI KPIs / goals in objectives ❑ RI included in appraisal process ❑ Variable pay linked to RI performance ❑ None of the above	[same as above]
	Other C-level staff or head of department, specify_____	[same as above]	[same as above]
	Portfolio managers	[same as above]	[same as above]
	Investment analysts	[same as above]	[same as above]
	Dedicated responsible investment staff	[same as above]	[same as above]
	Investor relations	[same as above]	[same as above]
	Other role (1) [from SG 07]	[same as above]	[same as above]
	Other role (2) [from SG 07]	[same as above]	[same as above]
SG 08.2	Describe any activities undertaken during the reporting year to develop and maintain board members' skills and knowledge in relation to responsible investment.		
SG 08.3	Provide any additional information on your organisation's performance management, reward and/or personal development processes in relation to responsible investment.		

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SG 08.4	Describe the level of experience board members/trustees/chief-level staff have with incorporating ESG factors into investment decision-making processes.

SG 08	**EXPLANATORY NOTES**
SG 08	The indicator [SG 08.1] is aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations and the ICGN Global Stewardship Principles. This indicator gives you the opportunity to provide information about how responsible investment is incorporated into your organisation's performance management system. You may include details of any KPIs that are used to assess performance and how these relate to your organisation's responsible investment objectives and targets, how performance is assessed against these KPIs, how performance is incorporated into financial reward mechanisms or other incentive schemes, and how development and learning needs are identified and addressed. KPIs may also relate to responsible investment processes, for example, the development or implementation of a responsible investment policy for a particular asset class, linking responsible investment performance with investment performance, the ESG characteristics of investments, activities to promote responsible investment (e.g., to participate in a particular collaborative initiative) or building capacity and resources (e.g., to provide ESG training to investment analysts). Development and learning needs may relate to building knowledge on specific ESG issues or more general responsible investment activities and approaches. A development plan that aims to develop your organisation's responsible investment knowledge and capacity may include formal or informal training. Formal training could include attendance (virtual or in person) at training courses such as those offered by universities, the Sustainable Investment Professional Certification (SIPC) or the Responsible Investment Academy of Australia (RIAA). Informal training could include attendance at conferences or briefings or participation in mentoring schemes.
LOGIC	
SG 08	If you report in [07.1] that individuals within your organisation have oversight/accountability or implementation roles in relation to responsible investment, the parts of indicator [08.1] that relate to these roles will be applicable. [SG 08.2] will be applicable if you report in [SG 08.1] that "RI is included in the personal development/training plan" for "Board member/board of trustees". [SG 08.4] is only available to Asset Owners
ASSESSMENT	
SG 08	Maximum score: Six ★ This indicator assesses two parts of [08.1] separately. Firstly, RI in objectives, appraisal and/or rewards for individuals with oversight or implementation responsibilities is assessed and is worth three ★. Secondly, RI in personal development and/or training plan for individuals with oversight or implementation responsibilities is assessed and is worth three ★.
	Indicator scoring methodology

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	Selected response	Level score	Further Details
	Responsible investment included in objectives, appraisal and/or reward (SG 08.1a)		
	'None of the above'	⭘	
	Responsible investment in objectives, appraisal and/or reward for any individuals with oversight OR implementation responsibilities	★★	This can be any element or all elements.
	Responsible investment in objectives, appraisal and/or reward for any individuals with oversight AND implementation responsibilities	★★★	This can be any element or all elements.
	Responsible investment included in personal development and/or training plan (SG 08.1b)		
	None of the above	⭘	
	Up to 33% of individuals with oversight or implementation responsibilities	★	The percentage is calculated from how many roles were selected in SG 07.1 with oversight or implementation responsibilities (denominator), and selection in SG 08.1 (numerator)
	34% to 65% of individuals with oversight or implementation responsibilities	★★	See above
	66% to 100% of individuals with oversight or implementation responsibilities	★★★	See above

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SECTION

Promoting responsible investment

SG 09	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 4,5

SG 09	INDICATOR		
SG 09.1	Select the collaborative organisation and/or initiatives of which your organisation is a member or in which it participated during the reporting year and the role played.		
	Collaborative Organisation/ Initiative	**Your organisation's role in the initiative during the reporting year (see definitions)**	**Provide a brief commentary on the level of your organisation's involvement in the initiative.** [OPTIONAL]
	☑ Principles for Responsible Investment (PRI)	Basic, Moderate, Advanced [drop down]	
	❑ Asian Corporate Governance Association	[same as above]	
	❑ Australian Council of Superannuation Investors	[same as above]	
	❑ AFIC—La Commission ESG	[same as above]	
	❑ BVCA—Responsible Investment Advisory Board	[same as above]	
	❑ CDP Climate Change	[same as above]	
	❑ CDP Forest	[same as above]	
	❑ CDP Water	[same as above]	
	❑ CFA Institute Centre for Financial Market Integrity	[same as above]	
	❑ Code for Responsible Investment in SA (CRISA)	[same as above]	
	❑ Code for Responsible Finance in the 21st Century	[same as above]	
	❑ Council of Institutional Investors (CII)	[same as above]	
	❑ Eumedion	[same as above]	
	❑ Extractive Industries Transparency Initiative (EITI)	[same as above]	
	❑ ESG Research Australia	[same as above]	
	❑ Invest Europe—Responsible Investment Roundtable	[same as above]	
	❑ Global Investors Governance Network (GIGN)	[same as above]	
	❑ Global Impact Investing Network (GIIN)	[same as above]	

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	❑ Global Real Estate Sustainability Benchmark (GRESB)	[same as above]	
	❑ Green Bond Principles	[same as above]	
	❑ Institutional Investors Group on Climate Change (IIGCC)	[same as above]	
	❑ Interfaith Center on Corporate Responsibility (ICCR)	[same as above]	
	❑ International Corporate Governance Network (ICGN)	[same as above]	
	❑ Investor Group on Climate Change, Australia/New Zealand (IGCC)	[same as above]	
	❑ International Integrated Reporting Council (IIRC)	[same as above]	
	❑ Investor Network on Climate Risk (INCR)/CERES	[same as above]	
	❑ Local Authority Pension Fund Forum	[same as above]	
	❑ Principles for Sustainable Insurance	[same as above]	
	❑ Regional or National Social Investment Forums (e.g., UKSIF, Eurosif, ASRIA, RIAA, US SIF); specify_____	[same as above]	
	❑ Responsible Finance Principles in Inclusive Finance	[same as above]	
	❑ Shareholder Association for Research and Education (Share)	[same as above]	
	❑ United Nations Environment Programme Finance Initiative (UNEP FI)	[same as above]	
	❑ United Nations Global Compact	[same as above]	
	❑ Other collaborative organisation/ initiative; specify_____	[same as above]	
	❑ Other collaborative organisation/ initiative; specify_____	[same as above]	
	❑ Other collaborative organisation/ initiative; specify_____	[same as above]	
	❑ Other collaborative organisation/ initiative; specify_____	[same as above]	

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SG 09.2	Indicator status	Purpose	Principle
	MANDATORY TO REPORT, VOLUNTARY TO DISCLOSE	DESCRIPTIVE	PRI 1
	Indicate approximately what percentage (+/- 5%) of your externally managed assets under management are managed by PRI signatories.		
	_____ %		

SG 09	EXPLANATORY NOTES
SG 09	**The indicator [SG 9.1] is aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations.** The option 'Principles for Responsible Investment' has been prefilled for all signatories. You can also add organisations or initiatives that are not listed. Please do not list here initiatives and collaborations that have the sole role of supporting your organisation in collaborative engagements with specific companies. Information on these should be supplied in the engagement section of each asset class module. Please note that you should NOT report on any collaborative organisations and/or initiatives of which your service provider(s) is a member or in which it participated during the reporting year. You may report on any further initiatives and actions taken to promote responsible investment in the subsequent indicator, SG 10.
SG 09.2	These figures are used to reduce the scope for double counting of signatories' AUM for the purposes of PRI public communication. There is no value judgement on this percentage, and it will not be used as part of the scoring/assessment methodology.
ASSESSMENT	
SG 09	Maximum score: Three ★ This indicator assesses signatories' involvement in collaborative organisations or initiatives that promote responsible investment. A higher level of involvement will receive higher credit than being involved in many organisations/initiatives.

Indicator scoring methodology

Selected response	Level score	Further Details
'No' or 'Basic' role in PRI only	○	
Basic role in any initiative	★	In addition to PRI
Moderate role in any initiative	★★	In addition to PRI
Advanced role in any initiative	★★★	In addition to PRI

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SG 09	DEFINITIONS
Basic role	Select this category if at least one of these activities applies to your organisation: • Joined or signed up to an initiative; • Attended conferences as a participant; and/or • Attended one or two meetings arranged by the initiative to be informed of its progress.
Moderate role	Select this category if at least one of these activities applies to your organisation: • Acted ad-hoc as a public spokesperson for the initiative; • Participated to some degree in advancing the initiative by preparing position papers and joint statements; and/or • Contributed to the organisation or content of events organised by the initiative
Advanced role	Select this category if at least one of these activities applies to your organisation: • Played a leading role in the initiative by preparing position papers and joint statements; • Regularly acted as a public spokesperson for the initiative and actively promoted it; and/or • Provided significant operational, content development and/or financial support to the initiative beyond basic membership requirements.

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SG 10	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 4

SG 10	INDICATOR		
SG 10.1	Indicate if your organisation promotes responsible investment independently of collaborative initiatives.		
	❍ Yes	❍ No	
SG 10.2	Indicate the actions your organisation has taken to promote responsible investment independently of collaborative initiatives. Provide a description of your role in contributing to the objectives of the selected action and the typical frequency of your participation/contribution.		
	Action to promote responsible investment	**Description**	**Frequency of contribution**
	❑Provided or supported education or training programmes (this includes peer to peer RI support) Your education or training may be for clients, investment managers, actuaries, broker/dealers, investment consultants, legal advisers etc.)		[DROPDOWN] Quarterly or more frequently, Biannually, Annually, Less frequently than annually, Ad hoc, Other, specify____
	❑Provided financial support for academic or industry research on responsible investment		Same as above
	❑Provided input and/or collaborated with academia on RI related work		Same as above
	❑Encouraged better transparency and disclosure of responsible investment practices across the investment industry		Same as above
	❑Spoke publicly at events and conferences to promote responsible investment		Same as above
	❑Wrote and published in-house research papers on responsible investment		Same as above
	❑Encouraged the adoption of the PRI		Same as above
	❑ Responded to RI related consultations by non-governmental organisations (OECD, FSB etc.)		Same as above
	❑Wrote and published articles on responsible investment in the media		Same as above
	❑ A member of PRI advisory committees/ working groups, specify _____		Same as above
	❑On the Board of, or officially advising, other RI organisations (e.g. local SIFs)		Same as above
	❑Other, specify_____		Same as above

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SG 10.3	Describe any additional actions and initiatives that your organisation has taken part in during the reporting year to promote responsible investment. [OPTIONAL]

SG 10	**EXPLANATORY NOTES**
SG 10.2	Describe your role in the action taken to promote responsible investment. Describe which events you spoke at, describe the education and to whom it was provided, provide information on the research funded and published, explain how you encouraged better disclosure, etc. 'Frequency of contribution' might for instance be how often you provide input to working groups or advisory committees, e.g. through meetings or through feedback on a piece of work. To find out more on how service provider signatories are incorporating ESG/RI into their practices, view our analysis and visualisation in the service provider interactive snapshot report available on the Data Portal and the PRI website.
SG 10.3	The information that you provide here may also include additional actions and initiatives that your organisation has taken part in during the reporting year that are not listed in SG 10.2. You may also describe in more detail the topics you addressed, e.g. accounting for climate change in investment or other ESG themes such as equality and diversity, tax transparency and human rights. You may also specify whether you typically promote specific E, S and/or G issues. You may wish to provide an URL/website link for an overview of your various actions and initiatives that your organisation has taken part in. You should not report on any actions and initiatives that service providers perform for you, unless it is a single initiative that the service provider does specifically for you.
LOGIC	
SG 10	[SG 10.2] will be applicable if 'Yes' is reported in [SG 10.1]
ASSESSMENT	
SG 10	Maximum score: Three ★ This indicator assesses whether RI has been promoted independently of collaborative initiatives [10.1] and what actions were taken [10.2].

Indicator scoring methodology	
Selected response	**Level score**
'No'	○
'Yes' and two actions or fewer	★★
'Yes' and more than two actions	★★★

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SG 11	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle 4,5,6

SG 11	INDICATOR
SG 11.1	Indicate whether your organisation—individually or in collaboration with others—conducted dialogue with public policy-makers or regulators to support responsible investment in the reporting year. ❑ Yes ❒ Yes, individually ❒ Yes, in collaboration with others ❑ No Please explain why not_____
SG 11.2	Select the methods you have used. ❑ Endorsed written submissions to governments, regulators or public policy-makers developed by others ❑ Drafted your own written submissions to governments, regulators or public policy-makers ❑ Participated in face-to-face meetings with government members or officials to discuss policy ❑ Other; specify_____
SG 11.3	If you have made written submissions (individually or collaboratively) to governments and regulatory authorities, indicate if these are publicly available. **Publicly available**: ❍ Yes ❍ No **URL(s)**:
SG 11.4	Provide a brief description of the main topics your organisation has engaged with public policy-makers or regulators on.

SG 11	EXPLANATORY NOTES
SG 11	**The indicator [SG 11.1] is aligned with the ICGN Global Stewardship Principles.** These activities could include direct dialogue with government agencies, regulatory authorities and standard-setters on policy issues, supporting other actors in their public policy dialogue activities, providing information on specific ESG issues (e.g., climate change, water or executive remuneration), explaining your views on public policy issues (e.g., mandatory company sustainability reporting) or providing information on responsible investment more generally.
SG 11.2	If you have provided feedback to public consultations conducted by governments, regulators or standard-setters, select 'Drafted your own written submissions to governments, regulators or standard-setters'.
SG 11.4	You can indicate the topics of your dialogues here. These may be topics on climate change, energy, sustainability, greenhouse gas emissions and footprints as well as other social and

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	governance factors. If you do not engage in public policy dialogue (e.g., if you are not permitted to do so because of regulatory constraints or you do not consider such engagement a prudent use of your resources), you can explain this here.
LOGIC	
SG 11	[SG 11.2] and [SG 11.3] will be applicable if you report in [SG 11.1] 'Yes, individually' or 'Yes, in collaboration with others'. In [SG 11.3], the URL column will only be applicable if you report that your written submissions are publicly available.
ASSESSMENT	
SG 11	Maximum score: Three ★ This indicator assesses whether signatories have conducted dialogue with public policy-makers or standard-setters to support responsible investment. Whether this was conducted individually or through collaboration with others does not influence the scoring.

Indicator scoring methodology

Selected response	Level score	Further Details
'No'	⭘	
'Yes'	★★★	To get three ★ signatories must also respond to at least one part of 11.2, 11.3 or 11.4

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SECTION

Outsourcing to fiduciary managers and investment consultants

SG 12	Indicator status	Purpose	Principle
	MANDATORY	CORE ASSESSED	PRI 4

SG 12.1

Indicate whether your organisation uses investment consultants.

❑ Yes, we use investment consultants.

❑ No, we do not use investment consultants.

SG 12.2

Indicate whether your organisation uses investment consultants in the selection, appointment and/or monitoring of external managers.

	Listed equity (LE)	Fixed income — SSA	Fixed income — corporate (financial)	Fixed income —corporate (non-financial)	Fixed income — securitised	Private equity (PE)	Infrastructure (INF)	Property (PR)	Other asset classes
❑ We use investment consultants in our selection and appointment of external managers.	❑	❑	❑	❑	❑	❑	❑	❑	❑
❑ We use investment consultants in our monitoring of external managers.	❑	❑	❑	❑	❑	❑	❑	❑	❑

❍ We do not use investment consultants for selection, appointment and monitoring of external managers.

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SG 12.3	Indicate whether your organisation considers responsible investment in the selection, appointment and/or review processes for investment consultants.
	❑ Responsible investment is considered when evaluating investment consultants' investment beliefs, strategies and policies in the selection process. ❑ Responsible investment is considered when evaluating investment consultants' public commitment to, and promotion of, responsible investment in the selection process. ❑ Responsible investment is considered when reviewing investment consultants' approach to investment manager ratings, research and recommendations in the monitoring process ❑ Consultants' responsibilities in terms of responsible investment in manager selection, appointment and monitoring processes are included in our contractual agreements with the investment consultants ❍ We do not consider responsible investment in the selection, appointment and/or review processes for investment consultants.
SG 12.4	Indicate whether you use investment consultants for any the following services. Describe the responsible investment components of these services.

Investment consultant services	Describe how responsible investment is incorporated
❑ Custodial services	
❑ Investment policy development	
❑ Strategic asset allocation	
❑ Investment research	
❑ Other, specify (1)____	
❑ Other, specify (2)____	
❑ Other, specify (3)____	
❍ None of the above	

SG 12.5	Indicate whether your organisation considers any of the following responsible investment factors in the monitoring of fiduciary managers.
	❑ Including responsible investment as a standard agenda item at performance review meetings ❑ Discussing whether the fiduciary manager has acted in accordance with your organisation's overall investment beliefs/ strategy/ policy on responsible investment and ESG factors

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	❑ Reviewing the fiduciary manager's PRI Transparency or Assessment reports ❑ Reviewing the fiduciary manager's responsible investment reporting (excluding PRI generated reports) ❑ Reviewing ESG characteristics/factors used by the fiduciary manager in portfolio construction ❑ Reviewing the fiduciary manager's incorporation approaches of ESG through-out asset classes ❑ Reviewing the impact of ESG factors on financial performance ❑ Encouraging your fiduciary managers to consider joining responsible investment initiatives/organisations or participate in educational or collaborative projects with other investors ❑ Including responsible investment criteria as a formal component of overall manager performance evaluation ❑ Reviewing the fiduciary manger's ESG incorporation in external managers' selection, appointment, monitoring ❑ Reviewing how ESG materiality is defined by the fiduciary manager ❑ Other general aspects of your monitoring; specify_____ ❍ We do not consider responsible investment in the monitoring processes for fiduciary managers.
SG 12.6	Describe the approach you take to monitoring your fiduciary managers and the reason(s) for this approach [OPTIONAL]
SG 12.7	Additional information. [OPTIONAL]

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SG 12	EXPLANATORY NOTES
SG 12	Investment consultants and fiduciary managers can play an important role in manager selection, appointment and monitoring as well as in other services such as strategic asset allocation. They can therefore make a significant contribution to the promotion and development of responsible investment. This indicator allows you to explain if and how your organisation works with investment consultants and fiduciary managers. The sub-indicators capture how and to what extent you consider their responsible investment capabilities in your selection, appointment and monitoring processes. To find out more on how service provider signatories are incorporating ESG/RI into their practices, view our analysis and visualisation in the service provider interactive snapshot report available on the Data Portal and the PRI website.
SG 12.2	This sub-indicator aims to capture whether you use asset consultants in the selection and monitoring of external managers. This sub-indicator, however, does not cover whether you use asset consultants to implement responsible investments. This is captured in sub-indicator SG 12.3. If you select any of the indicator's options, part of your responsible investment implementation is occurring through your investment consultant(s). The option 'Other asset classes' includes Farmland, Forestry, Hedge funds, Cash and/or Other. It is applicable if you report assets (externally) in any of these categories in the Organisational Overview (OO) module.
SG 12.3	To find out more on how your peers have responded on this practice, view our analysis and visualisation in the asset owner interactive data report available on the Data Portal and the PRI website.
SG 12.4	You mays wish to describe whether you require your investment consultants to incorporate ESG factors in their services. You may also wish to comment on the extent to which responsible investment is part of the services outsourced to investment consultants, e.g. if responsible investment is fully integrated throughout their services or for certain components of the service.
SG 12.5	This sub-indicator aims to capture how responsible investment is considered in the monitoring of your fiduciary managers.
SG 12.7	This may include a more detailed description of the fiduciary managers' monitoring processes or a description of why you do not monitor your fiduciary managers.
LOGIC	
SG 12	[SG 12.2] is applicable if you report externally managed assets in [OO 05.1] and if you report 'Yes, we use investment consultants' in [SG 12.1]. Within [SG 12.2], the asset classes that are presented will depend on the information reported in the 'Organisational Overview' (OO) module, for example Fixed Income SSA will appear if they have reported Fixed Income in [OO 05.1], reported SSA in [OO 07.1], are opted in [OO 12.1]. [SG 12.4] is applicable if you report 'Yes, we use investment consultants' in [SG 12.1]. [SG 12.3] is applicable if report 'Yes, we use investment consultants in our selection, appointment and/or monitoring of external managers' in [SG 12.2]. [SG 12.5] and [SG 12.6] are applicable if you report 'Yes, we use fiduciary managers' in OO 06.5
ASSESSMENT	

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SG 12	Maximum score: Three ★ per asset class. The assessment of this indicator is based on your responses to [12.3] and/or [12.5]. Organisations that do not use investment consultants or fiduciary managers will not be assessed on this indicator. The scoring of this indicator will feed into your overall score for the Selection, Appointment and Monitoring (SAM) module, if SAM is applicable to you.	
	Indicator scoring methodology	
	Selected response	**Level score**
	'No' in SG 12.1, or 'Yes' in SG 12.1 but Investment Consultants are not used for a specific asset class.	N/A
	If using investment consultants (a)	
	'We do not consider responsible investment in the selection, appointment and/or review processes for investment consultants in SG 12.3	○
	One option selected in SG 12.3	★
	Two options selected in SG 12.3	★★
	Three options selected in SG 12.3	★★★
	If using fiduciary managers (b)	
	'We do not consider responsible investment in the monitoring processes for fiduciary mangers' in SG 12.5.	○
	'Responsible investment is considered when monitoring our fiduciary manager' , and one selection in SG 12.5.	★
	'Responsible investment is considered when monitoring our fiduciary manager', and up to three selections in SG 12.5.	★★
	'Responsible investment is considered when monitoring our fiduciary manager' and more than three selections in SG 12.5.	★★★

SG 12	DEFINITIONS
Fiduciary Manager	Fiduciary management refers to a combination of advisory and implementation services provided to a pension fund. The fiduciary manager is typically accountable to the trustees for the performance of the fund, while the trustees retain governance oversight. A range of functions may be delegated, but for this framework, we define fiduciary management as cases in which a fiduciary manager has responsibility for determining the allocation to different asset classes and day-to-day running of the fund, including hiring and firing investment managers.
Investment Consultants	Provision of financial or non-financial advice on a retainer or ad hoc basis relating to environmental, social, and/or governance aspects of investment activity. Services provided do not include active investment management and fiduciary management. Examples of advisory and consultancy services include, but are not limited to, custodial services, investment policy development, strategic asset allocation, investment research and manager selection and monitoring.

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SECTION

ESG issues in asset allocation

SG 13	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle PRI 1

SG 13	INDICATOR
SG 13.1	Indicate whether your organisation carries out scenario analysis and/or modelling, and if it does, provide a description of the scenario analysis (by asset class, sector, strategic asset allocation, etc.). ❒ Yes, in order to assess future ESG factors Describe [50 words] _____ ❒ Yes, in order to assess future climate-related risks and opportunities Describe [50 words] _____ ❒ No, our organisation does not currently carry out scenario analysis and/or modelling
SG 13.2	Indicate whether your organisation considers ESG issues in strategic asset allocation and/or allocation of assets between sectors or geographic markets. ❍ We do the following: ❒ Allocation between asset classes ❒ Determining fixed income duration ❒ Allocation of assets between geographic markets ❒ Sector weightings ❒ Other; specify ____ ❍ We do not consider ESG issues in strategic asset allocation and/or allocation of assets between sectors or geographic markets.
SG 13.3	Additional information. [OPTIONAL]

SG 13	EXPLANATORY NOTES
SG 13.1	Scenario analysis that incorporates factors representing the investment impact of future trends, including their risk profile at a portfolio level, for example. For example, resource scarcity, technological developments. For many investors, the most significant effects of climate change are likely to arise over the medium to long term, with their timing and magnitude remaining uncertain. This makes it challenging to understand the implications from an investment perspective. Scenario analysis is a useful tool for companies and investors to understand the strategic implications of climate-related risks and opportunities. More industry work is needed on scenarios, particularly reference scenarios.

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	The difference between 'ESG factors' and 'climate-related risks and opportunities': in this indicator, 'climate-related risks and opportunities' refers to the real and potential impact of climate change, including physical and transitional risks and the resulting opportunities. Refer to Appendix 1 of Implementing the Recommendations of the Task Force on Climate-related Financial Disclosures. To find out more on how your peers have responded on this practice, view our analysis and visualisation in the climate change interactive snapshot report available on the Data Portal and the PRI website.
SG 13.2	Strategic Asset Allocation covers investment allocation to high level asset classes according to their differing return and risk profiles to match the investor's risk tolerance, time horizon and investment objectives/beliefs. This may include choosing an appropriate equity/fixed income/cash split, developed/emerging market split, duration of fixed income and listed/unlisted split. Some signatories are starting to assess the implications of issues such as water scarcity for their asset allocation (e.g., on the basis of economic scenario planning). Some may also consider corporate governance practices, the robustness of a country's regulatory frameworks, or a country's approach to managing environmental and social challenges when making geographical allocations. These approaches are still relatively uncommon, particularly as far as environmental and social issues are concerned. This indicator nonetheless allows signatories that are working in this area to explain their activities. This is distinct from general ESG integration into individual investment decisions, which is covered in detail in the asset class specific modules of the Reporting Framework. As an example, ESG influenced decisions about whether to invest in listed equities or alternative asset classes can be reported in this indicator. Screening individual stocks based on ESG criteria should be reported in the Listed Equity—Integration module. To find out more on how your peers have responded on this practice, view our analysis and visualisation in the asset owner interactive data report available on the Data Portal and the PRI website.
SG 13.3	You can describe how your organisation considers ESG issues in strategic asset allocation, for example avoiding investment in certain fossil fuel heavy assets or investments in low carbon assets.
LOGIC	
SG 13	[SG 13.2] will be applicable if in [SG 13.1], any of the 'Yes' options are reported.

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SG 14	Indicator status MANDATORY TO REPORT, VOLUNTARY TO DISCLOSE	Purpose ADDITIONALLY ASSESSED	Principle PRI 1

SG 14	INDICATOR
SG 14.1	Some investment risks and opportunities arise as a result of long term trends. Indicate which of the following are considered. ❒ Changing demographics ❒ Climate change ❒ Resource scarcity ❒ Technological developments ❒ Other, specify (1)____ ❒ Other, specify (2) ____ ❒ None of the above, please explain why not_____
SG 14.2	Indicate which of the following activities you have undertaken to respond to climate related risk and opportunities ❒ Established a climate change sensitive or climate change integrated asset allocation strategy ❒ Targeted low carbon or climate resilient investments Specify the AUM invested in low carbon and climate resilient portfolios, funds, strategies or asset classes. [ ] (Dropdown options of currency) [ ] USD Specify the framework or taxonomy used. Free text (200 words) ❒ Phase out your investments in your fossil fuel holdings ❒ Reduced portfolio exposure to emissions intensive or fossil fuel holdings ❒ Used emissions data or analysis to inform investment decision making ❒ Sought climate change integration by companies ❒ Sought climate supportive policy from governments ❒ Other, specify ____ ❒ None of the above, please explain why not_____
SG 14.3	Indicate which of the following tools your organisation uses to manage climate-related risks and opportunities ❒ Scenario analysis ❒ Disclosures on emissions risks to clients/trustees/management/beneficiaries ❒ Climate-related targets ❒ Encouraging internal and/or external portfolio managers to monitor emissions risk

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	❒ Emissions-risk monitoring and reporting are formalised into contracts when appointing managers ❒ Weighted average carbon intensity ❒ Carbon footprint (scope 1 and 2) ❒ Portfolio carbon footprint ❒ Total carbon emissions ❒ Carbon intensity ❒ Exposure to carbon-related assets ❒ Other emissions metrics ❒ Other, specify ____ ❒ None of the above, please explain why not_____
SG 14.4	If you selected disclosure on emissions risks, please list any specific climate related disclosure tools or frameworks that you used.
SG 14.5	Additional information. [OPTIONAL]

SG 14	**EXPLANATORY NOTES**
SG 14.1	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 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. The terms used are broad and may impact investment processes in a number of different ways. In the "additional information" field, we encourage signatories to provide additional detail on how these trends will impact their investment approach.
SG 14.2	Climate change presents both risks and opportunities. This indicator covers how climate change impacts your investment decision making, active ownership practices and if relevant, engagement with fund managers, as well as engagement with governments to encourage a climate-supportive policy environment for investors. To find out more on how your peers have responded on this practice, view our analysis and visualisation in the climate change interactive snapshot report available on the Data Portal and the PRI website.
SG 14.3	Activities to measure and reduce your organisation's own carbon footprint should not be captured here, unless they are undertaken for buildings that you occupy and report on as part of a directly managed property portfolio.
LOGIC	
SG 14	[SG 14.2] and [SG 14.3] will be applicable if 'Climate change' is reported in [SG 14.1] [SG 14.4] will be applicable if you report 'Disclosure on emissions risk to clients/trustees/management/beneficiaries' in [SG 14.3].
ASSESSMENT	

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SG 14	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	SG 14.1 does not have “Climate Change” selected OR SG 14.2 and SG 14.3 both have “None of the above” selected	⭘	
	One option from either SG 14.2 OR SG 14.3 selected	★★	"Other, specify" is not assessed
	One option from both SG 14.2 AND SG 14.3 selected	★★★	"Other, specify" is not assessed

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SG 15	Indicator status MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	Purpose DESCRIPTIVE	Principle PRI 1

SG 15	INDICATOR	
SG 15.1	Indicate whether your organisation allocates assets to, or manages, funds based on specific environmental and social themed areas.	
	❍ Yes	❍ No
SG 15.2	Indicate the percentage of your total AUM invested in environmental and social themed areas.	
	_____ %	

SG 15.3 Specify which thematic area(s) you invest in, indicate the percentage of your AUM in the particular asset class and provide a brief description.

Area	Asset class invested (pre-populated from OO 05)	Percentage of AUM per asset class invested in the area	Brief description and measures of investment
❒ Energy efficiency / Clean technology	❑ Asset class 1	_____ % of AUM	
	❑ Asset class 2	_____ % of AUM	
	❑ Asset class 3	_____ % of AUM	
	❑ Asset class 4	_____ % of AUM	
	❑ Asset class 5	_____ % of AUM	
	❑ Asset class 6	_____ % of AUM	
	❑ Asset class 7	_____ % of AUM	
	❑ Asset class 8	_____ % of AUM	
	❑ Asset class 9	_____ % of AUM	
	❑ Asset class 10	_____ % of AUM	
	❑ Asset class 11	_____ % of AUM	
	❑ Asset class 12	_____ % of AUM	
	❑ Asset class 13	_____ % of AUM	
❒ Renewable energy		_____ % of AUM	
❒ Green buildings		_____ % of AUM	
❒ Sustainable forestry		_____ % of AUM	
❒ Sustainable agriculture		_____ % of AUM	

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	❒ Microfinance		_____ % of AUM	
	❒ SME financing		_____ % of AUM	
	❒ Social enterprise/community investing		_____ % of AUM	
	❒ Affordable housing		_____ % of AUM	
	❒ Education		_____ % of AUM	
	❒ Global health		_____ % of AUM	
	❒ Water		_____ % of AUM	
	❒ Other; specify____		_____ % of AUM	
SG 15.4	Please attach any supporting information you wish to include. [OPTIONAL]			

SG 15	**EXPLANATORY NOTES**
SG 15	For the purpose of this reporting framework, the terms 'E&S themed' and 'sustainability themed' investments are used interchangeably. These are investments in themes or assets specifically related to E or S sustainability (for example, clean energy, green technology or sustainable agriculture). These investments typically offer investors one way to explicitly align their activities with the broader objectives of society. This indicator refers to investment themes that may include more than one asset class. These investments are specifically focused on certain themes. This indicator is not about broad-based SRI funds, which may be described in other parts of this reporting framework. Further details on environmental and social themed investments can be found here. If you have E&S themed areas where two or more E&S themes are combined, e.g. 'affordable housing' and 'green buildings', please split the percentage of AUM per asset class invested in those areas to an approximate percentage per theme.
SG 15.3	Asset classes reported in OO 05, either internally and/or externally managed, will be visible in the drop-down menu. Provide percentage of AUM per asset class invested in each area. In brief description and measures of the investment please provide description of how you classify the area, and what measures you use to identify the area.
LOGIC	
SG 15	[SG 15.2 and 15.3] will be applicable if 'Yes' is reported in [SG 15.1]

SG 15	**DEFINITIONS**
Energy efficiency / Clean technology	Products, services, infrastructure or technologies that proactively address the growing global demand for energy while minimising effects in the environment. This includes technologies and systems that promote efficiency of industrial operations and industrial automation and controls, and optimisation systems; infrastructure, technologies, and systems that increase the efficiency of power management, power

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	distribution, power storage and demand-side management; and technologies and products that focus on using renewable energy sources to transport vehicles (this includes cars and buses). (source: an adapted version of the definition provided by MSCI, for more information, see PRI Impact Investing Market Map)
Renewable energy	Companies that generate their revenues from products, services or infrastructure projects supporting the development of renewable energy and alternative fuels, including the generation, transmission and distribution of electricity from renewable sources such as wind, solar, geothermal, biomass, small-scale hydro (25MW), waste energy and wave and tidal (source: an adapted version of the definition provided by MSCI, for more information see PRI Impact Investing Market Map).
Green buildings	Companies that generate their revenues from buildings designed, constructed, operated, maintained, renovated and destroyed using environmentally-friendly and resource-efficient processes (for more information, see PRI Impact Investing Market Map).
Sustainable forestry	Companies that generate revenues from products, services, infrastructure and projects to meet the social, economic, ecological and cultural needs of present and future generations. These needs are for forest products and services such as wood and wood products, water, food, fodder, medicine, fuel, shelter, employment, recreation, habitats for wildlife, landscape diversity, carbon sinks and reservoirs, and other forest products (for more information, see PRI Impact Investing Market Map).
Sustainable agriculture	Companies engage in sustainable agriculture businesses that conserve land, water, and plant and animal genetic resources, and are environmentally non-degrading, technically appropriate, economically viable and socially acceptable (source: FAO, for more information, see PRI Impact Investing Market Map).
Microfinance	Investments in retail institutions that provide financial services such as loans, savings, insurance and other basic services to low-income clients who run productive activities and who traditionally have lacked access to banking and related financial services.
SME financing	SME financing refers to providing financial services to small- and medium-sized enterprises that may struggle to access to banking and related financial services.
Social enterprise/community investing	Social enterprise development is defined as creating and nurturing businesses that aim for positive social or environmental outcomes while generating financial returns. Community development investments are similarly designed to specifically benefit lower-income neighbourhoods and populations, for example, by providing access to affordable housing, supporting small businesses, and, by extension, job creation.
Affordable housing	Companies that invest in housing projects, services and infrastructure "for which the associated financial costs are at a level that does not threaten or compromise the occupants' enjoyment of other human rights and basic needs and that represents a reasonable proportion of an individual's overall income" (source: IRIS, GIIN, for more information, see PRI Impact Investing Market Map).
Education	Companies and organisations that ensure equal access to all levels of education and/or vocational training for the population, including vulnerable groups such as low income individuals, those with disabilities, indigenous peoples and children in vulnerable situations; and/or companies which provide support to teachers and educators across all levels of education. The companies and organisations focus on supporting education development to individuals that is affordable, with quality and non-discriminatory policies or practices for women, girls and minority groups (source: combined definition from United Nations Declaration on Human Rights Education and Training, and the Human Rights Council Resolution on the Right to Education, for more information, see PRI Impact Investing Market Map).
Global health	Companies that serve the population with access to quality services, health workers, medicines and technologies. To achieve these goals, when applicable, companies

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	should provide equity in access to health services, quality of health services should be measurable, and, most importantly, companies should actively provide affordable services, products and technologies that will not create financial hardship from healthcare costs. (Source: WHO, for more information, see PRI Impact Investing Market Map).

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SECTION

Asset class implementation not reported in other modules

SG 16	Indicator status	Purpose	Principle
	MANDATORY	DESCRIPTIVE	GENERAL

SG 16	INDICATOR	
SG 16.1	Describe how you address ESG issues for internally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.	
	Asset Class	**Describe what processes are in place and the outputs or outcomes achieved**
	Listed equities—ESG incorporation	
	Listed equities—engagement	
	Listed equities—(proxy) voting	
	Fixed income—SSA	
	Fixed income—Corporate (financial)	
	Fixed income—Corporate (non-financial)	
	Fixed income—Securitised	
	Private equity	
	Property	
	Infrastructure	
	Commodities	
	Hedge funds	Select whether you have responded to the PRI Hedge Fund DDQ ❍ Yes ❍ No
	Fund of hedge funds	Select whether you have responded to the PRI Hedge Fund DDQ ❍ Yes ❍ No
	Forestry	
	Farmland	
	Inclusive finance	
	Cash	

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	Money market instruments	
	Other (1) [from OO 05]	
	Other (2) [from OO 05]	

SG 16	EXPLANATORY NOTES
SG 16	This indicator allows you to describe how you implement RI in asset classes for which the PRI has not developed a specific module. By reporting this information, you can inform stakeholders about how you advancing in these areas. Moreover, you support the PRI in identifying RI practices to be captured by potential future modules. This indicator also gives you an opportunity to report on asset classes covered by a PRI module but for which you choose not to report on because you fall under the required threshold. For example, you may have limited resources to systematically track your RI implementation on a minor amount of private equity in your portfolio, but you may still want to describe here your main RI activities in this asset class.
SG 16 Hedge Funds	The PRI Hedge Fund DDQ is a tool to assist investors in their managers' selection and assessment process. It comprises a standardised set of questions, which will make it easier to identify those fund managers who have the staff, knowledge and structure in place to incorporate Environmental, Social and Governance (ESG) factors in the investment decision-making process. Facilitating this process will result in a reduced reporting burden and an improvement of peers' comparison, cross checking of information and data consistency across the hedge fund industry For further information please refer to the PRI website.
LOGIC	
SG 16	[SG 16] is applicable if you reported that your organisation has internally managed assets [OO 05] and that you incorporate ESG issues into investment decisions and/or active ownership practices for internally managed assets ([OO 10] for listed equity or [OO 11] for other asset classes) for asset classes in which: • less than 10% of your AUM are in that asset class, and/or you have opted not to complete that asset class module voluntarily [OO 12], or • PRI has not yet developed a direct module for that asset class. The applicable asset classes in this indicator will be prepopulated based on [OO 05] and [OO 10-12].

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SG 17	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle GENERAL

SG 17	INDICATOR	
SG 17.1	Describe how you address ESG issues for externally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.	
	Asset Class	**Describe what processes are in place and the outputs or outcomes achieved**
	Listed equities—ESG incorporation	
	Listed equities—engagement	
	Listed equities—(proxy) voting	
	Fixed income—SSA	
	Fixed income—Corporate (financial)	
	Fixed income Corporate (non-financial)	
	Fixed income—Securitised	
	Private equity	
	Property	
	Infrastructure	
	Commodities	
	Hedge funds	Select whether you use the PRI Hedge Fund DDQ ❍ Yes ❍ No
	Fund of hedge funds	Select whether you have responded to the PRI Hedge Fund DDQ ❍ Yes ❍ No
	Forestry	
	Farmland	
	Inclusive finance	
	Cash	
	Money market instruments	
	Other (1) [from OO 05]	
	Other (2) [from OO 05]	

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SG 17	EXPLANATORY NOTES
SG 17	This indicator gives you an opportunity to report on how you incorporate ESG issues in the selection and monitoring of your external managers in asset classes that are covered by the PRI module indirect investments but for which you choose not to report on there.
SG 17 Hedge Funds	The PRI Hedge Fund DDQ is a tool to assist investors in their managers' selection and assessment process. It comprises a standardised set of questions, which will make it easier to identify those fund managers who have the staff, knowledge and structure in place to incorporate Environmental, Social and Governance (ESG) factors in the investment decision-making process. Facilitating this process will result in a reduced reporting burden and an improvement of peers' comparison, cross checking of information and data consistency across the hedge fund industry For further information please refer to the PRI website.

LOGIC	
SG 17	[SG 17] is applicable if you reported that your organisation has externally managed assets [OO 05] and that you incorporate ESG issues into investment decisions and/or active ownership practices for externally managed assets ([OO 11] for listed equity or [OO 12] for other asset classes) for asset classes in which: • less than 10% of your AUM are in that asset class and/or you have opted not to complete that asset class voluntarily [OO 13]; and/or • specific PRI asset class module has yet to be developed. The applicable asset classes in this indicator will be prepopulated based on [OO 05] and [OO 10-12].

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SECTION

Innovation

SG 18	Indicator status **VOLUNTARY**	Purpose **DESCRIPTIVE**	Principle **GENERAL**

SG 18	INDICATOR	
SG 18.1	Indicate whether any specific features of your approach to responsible investment are particularly innovative.	
	❍ Yes	❍ No
SG 18.2	Describe any specific features of your approach to responsible investment that you believe are particularly innovative.	

SG 18	EXPLANATORY NOTES
SG 18	The response to this indicator could relate to any aspects of your responsible investment processes, activities, outputs or outcomes that you consider to represent significant developments and progress in the practice of responsible investment in general or in a particular market or asset class. Illustrative examples include: • The introduction of longer holding periods (or portfolio turnover limits) to encourage longer-term thinking; • New ways of delivering information or reports to clients; • The development of innovative KPIs or performance measurement tools (e.g., to track the carbon intensity or other ESG characteristics of portfolios or to link these to financial performance); • The use of new engagement approaches that deliver better ESG or financial outcomes; and/or • New partnerships or collaborations. • Projects and investments with real-world impact aligned with the SDGs
LOGIC	
SG 18	[SG 18.2] will be applicable if you select 'Yes' in [SG 18.1]

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SECTION

Communication

SG 19	Indicator status	Purpose	Principle
	MANDATORY	CORE ASSESSED	PRI 2, 6

SG 19	INDICATOR	
SG 19.1	Indicate whether your organisation typically discloses asset class specific information proactively. Select the frequency of the disclosure to clients/beneficiaries and the public, and provide a URL to the public information.	
	Fixed income	
	❍ We do not disclose to either clients/beneficiaries or the public. ❍ We disclose to clients/beneficiaries only. ❍ We disclose to the public The information disclosed to clients/beneficiaries is the same ❍ Yes ❍ No	
	Disclosure to public and URL	**Disclosure to clients/beneficiaries**
	❍ Broad approach to RI incorporation ❍ Detailed explanation of RI incorporation strategy used	❍ Broad approach to RI incorporation ❍ Detailed explanation of RI incorporation strategy used
	[Dropdown] Quarterly, Biannually, Annually, Less frequently than annually, Ad hoc/when requested	[Dropdown] Quarterly, Biannually, Annually, Less frequently than annually, Ad hoc/when requested
	URL____ URL____	
	Infrastructure	
	❍ We do not disclose to either clients/beneficiaries or the public. ❍ We disclose to clients/beneficiaries only. ❍ We disclose to the public The information disclosed to clients/beneficiaries is the same ❍ Yes ❍ No	
	Disclosure to public and URL	**Disclosure to clients/beneficiaries**

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PRI Principles for Responsible Investment

	❑ ESG information on how you select infrastructure investments ❑ ESG information on how you monitor and manage infrastructure investments ❑ Information on your infrastructure investments' ESG performance	❑ ESG information on how you select infrastructure investments ❑ ESG information on how you monitor and manage infrastructure investments ❑ Information on your infrastructure investments' ESG performance
	[Dropdown] Quarterly, Biannually, Annually, Less frequently than annually, Ad hoc/when requested	[Dropdown] Quarterly, Biannually, Annually, Less frequently than annually, Ad hoc/when requested
	URL____ URL____	
	Listed equity - Engagement	
	❍ We do not disclose to either clients/beneficiaries or the public. ❍ We disclose to clients/beneficiaries only. ❍ We disclose to the public The information disclosed to clients/beneficiaries is the same ❍ Yes ❍ No	
	Disclosure to public	**Disclosure to clients/beneficiaries**
	❑ Details on the overall engagement strategy ❑ Details on the selection of engagement cases and definition of objectives of the selections, priorities and specific goals ❑ Number of engagements undertaken ❑ Breakdown of engagements by type/topic ❑ Breakdown of engagements by region ❑ An assessment of the current status of the progress achieved and outcomes against defined objectives ❑ Examples of engagement cases ❑ Details on eventual escalation strategy taken after the initial dialogue has been unsuccessful (i.e. filing resolutions, issuing a statement, voting against management, divestment etc.) ❑ Details on whether the provided information has been externally assured ❑ Outcomes that have been achieved from the engagement ❑ Other information____	❑ Details on the overall engagement strategy ❑ Details on the selection of engagement cases and definition of objectives of the selections, priorities and specific goals ❑ Number of engagements undertaken ❑ Breakdown of engagements by type/topic ❑ Breakdown of engagements by region ❑ An assessment of the current status of the progress achieved and outcomes against defined objectives ❑ Examples of engagement cases ❑ Details on eventual escalation strategy taken after the initial dialogue has been unsuccessful (i.e. filing resolutions, issuing a statement, voting against management, divestment etc.) ❑ Details on whether the provided information has been externally assured ❑ Outcomes that have been achieved from the engagement ❑ Other information____
	[Dropdown] Quarterly or more frequently, biannually, annually, less frequently than annually, Ad hoc/when requested	[Dropdown] Quarterly or more frequently, biannually, annually, less frequently than annually, Ad hoc/when requested

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URL____ URL____	

Listed equity – (Proxy) Voting

❍ We do not disclose to either clients/beneficiaries or the public.

❍ We disclose to clients/beneficiaries only.

❍ We disclose to the public

The information disclosed to clients/beneficiaries is the same
❍ Yes
❍ No

Disclosure to public	Disclosure to clients/beneficiaries
❍ Disclose all voting decisions ❍ Disclose some voting decisions ❍ Only disclose abstentions and votes against management	❍ Disclose all voting decisions ❍ Disclose some voting decisions ❍ Only disclose abstentions and votes against management
[Dropdown] Quarterly or more frequently, biannually, annually, less frequently than annually, Ad hoc/when requested	[Dropdown] Quarterly or more frequently, biannually, annually, less frequently than annually, Ad hoc/when requested
URL____ URL____	

Listed equity - Incorporation

❍ We do not disclose to either clients/beneficiaries or the public.

❍ We disclose to clients/beneficiaries only.

❍ We disclose to the public

The information disclosed to clients/beneficiaries is the same
❍ Yes
❍ No

Disclosure to public	Disclosure to clients/beneficiaries
❍ Broad approach to ESG incorporation ❍ Detailed explanation of ESG incorporation strategy used	❍ Broad approach to ESG incorporation ❍ Detailed explanation of ESG incorporation strategy used
[Dropdown] Quarterly, Biannually, Annually, Less frequently than annually, Ad hoc/when requested	[Dropdown] Quarterly, Biannually, Annually, Less frequently than annually, Ad hoc/when requested
URL____ URL____	

Private equity

❍ We do not disclose to either clients/beneficiaries or the public.

❍ We disclose to clients/beneficiaries only.

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❍ We disclose to the public

The information disclosed to clients/beneficiaries is the same
❍ Yes
❍ No

Disclosure to public	Disclosure to clients/beneficiaries
❑ ESG information in relationship to our pre-investment activities ❑ ESG information in relationship to our post-investment monitoring and ownership activities ❑ Information on our portfolio companies' ESG performance ❑ Other, specify____	❑ ESG information in relationship to our pre-investment activities ❑ ESG information in relationship to our post-investment monitoring and ownership activities ❑ Information on our portfolio companies' ESG performance ❑ Other, specify____
[Dropdown] Quarterly, Biannually, Annually, Less frequently than annually, Ad hoc/when requested	[Dropdown] Quarterly, Biannually, Annually, Less frequently than annually, Ad hoc/when requested
URL____ URL____	

Property

❍ We do not disclose to either clients/beneficiaries or the public.

❍ We disclose to clients/beneficiaries only.

❍ We disclose to the public

The information disclosed to clients/beneficiaries is the same
❍ Yes
❍ No

Disclosure to public	Disclosure to clients/beneficiaries
❑ ESG information on how you select property investments ❑ ESG information on how you monitor and manage property investments ❑ Information on your property investments' ESG performance ❑ Other; specify_____	❑ ESG information on how you select property investments ❑ ESG information on how you monitor and manage property investments ❑ Information on your property investments' ESG performance ❑ Other; specify_____
[Dropdown] Quarterly, Biannually, Annually, Less frequently than annually, Ad hoc/when requested	[Dropdown] Quarterly, Biannually, Annually, Less frequently than annually, Ad hoc/when requested
URL____ URL____	

Selection, Appointment and Monitoring (SAM)

❍ We do not disclose to either clients/beneficiaries or the public.

❍ We disclose to clients/beneficiaries only.

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❍ We disclose to the public

The information disclosed to clients/beneficiaries is the same
❍ Yes
❍ No

Disclosure to public	Disclosure to clients/beneficiaries
❑ How responsible investment considerations are included in manager selection, appointment and monitoring processes ❑ Details of the responsible investment activities carried out by managers on your behalf ❑ E, S and/or G impacts and outcomes that have resulted from your managers' investments and/or active ownership ❑ Other; specify_____	❑ How responsible investment considerations are included in manager selection, appointment and monitoring processes ❑ Details of the responsible investment activities carried out by managers on your behalf ❑ E, S and/or G impacts and outcomes that have resulted from your managers' investments and/or active ownership ❑ Other; specify_____
[Dropdown] Quarterly, Biannually, Annually, Less frequently than annually, Ad hoc/when requested	[Dropdown] Quarterly, Biannually, Annually, Less frequently than annually, Ad hoc/when requested
URL____ URL____	

Hedge Funds

❍ We do not disclose to either clients/beneficiaries or the public.

❍ We disclose to clients/beneficiaries only.

❍ We disclose to the public

The information disclosed to clients/beneficiaries is the same
❍ Yes
❍ No

Disclosure to public and URL	Disclosure to clients/beneficiaries
❍ Broad approach to RI incorporation for all strategies ❍ Detailed explanation of RI incorporation for each strategy used	❍ Broad approach to RI incorporation for all strategies ❍ Detailed explanation of RI incorporation for each strategy used
[Dropdown] Quarterly, Biannually, Annually, Less frequently than annually, Ad hoc/when requested	[Dropdown] Quarterly, Biannually, Annually, Less frequently than annually, Ad hoc/when requested
URL____ URL____	

SG 19.2

Additional information.

[OPTIONAL]

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PRI Principles for Responsible Investment

SG 19	EXPLANATORY NOTES
SG 19	**This indicator is aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations and the ICGN Global Stewardship Principles.**
SG 19.1	This indicator allows you to report on your specific approach to communication for each asset class. It allows you to demonstrate how widely you make information about RI activities available. 'Proactively' means beyond the publication of your responses to the PRI Reporting Framework on the PRI website. This can be information on your own website (such as your full or partial PRI Reporting Framework responses, or other forms of RI reporting), annual reports, newsletters etc. It may be information proactively given to clients or shared with the public using any form judged appropriate. Information available to certain groups – such as pensions fund beneficiaries – may in practice be in the public domain. However, proactive reporting to the public at large is treated here as a separate category of communication. **Listed equity – Incorporation** ***Broad approach to ESG incorporation*** This may include a general discussion of how ESG is incorporated in to listed equities investments. **Detailed *explanation of ESG incorporation strategy used*** This may include detailed information about each type of incorporation strategy used, the processes by which ESG is incorporated, any relevant policy documents and case studies/examples of impact. **Manager Selection, Appointment and Monitoring** Disclosure on how you are implementing responsible investments as an indirect investor can be done in different forms. The options provided cover three main approaches you may be following: • How RI is considered in selection, appointment and monitoring is primarily the type of information covered in this module of the reporting framework. If you proactively disclose the PRI reporting or other documentation on how you address ESG with external managers, you should select this first option. • Details of your external manager's RI implementation: this may be more detailed information of what your external manager is doing. This could be describing their activities to the public or simply linking to external managers websites that provide details of how they implement different areas of RI. • Outcomes: these are the E, S and/or G impacts as a result of your manager's activities (e.g. greenhouse gas emission reductions as a result of investment in wind and solar plants in an infrastructure fund, changes in a particular company's waste water management as a result of engagement activities, impact of ESG factors on financial performance and how you managers identify links between ESG analysis and performance or risk mitigation).
LOGIC	
SG 19	Each asset class section ("Fixed income"; "Infrastructure"; "Listed equity - engagement"; "Listed equity - voting"; "Listed equity - Incorporation"; "Private equity"; "Property"; "Selection, Appointment and Monitoring") will trigger if you have reported having the asset class in the OO module. For example Fixed Income SSA will appear if you reported Fixed Income in [OO 05.1], reported SSA in [OO 07.1], and opted in [OO 12.1].

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ASSESSMENT		
SG 19	The scoring of your approach to communication for each asset class will be added towards your score for specific asset class modules.	
	Indicator scoring methodology	
	Maximum score: Six ★ The assessment of this indicator is based on whether information is disclosed to the public and/or clients/beneficiaries, what information is disclosed and how frequently. For six stars, public disclosure is required. Disclosure to the public (SG 19a) and disclosure to clients/beneficiaries (SG 19b) are scored separately and can be awarded up to 3 stars each.	
Fixed income		
	Selected response	**Level score**
	No	⭘
	Broad approach less frequently than annually	★
	Broad approach annually or more frequently OR Detailed explanation less frequently than annually	★★
	Detailed explanation annually or more frequently	★★★
Infrastructure		
	Selected response	**Level score**
	No	⭘
	One type of ESG information disclosed less frequently than annually	★
	One type of ESG information disclosed annually or more frequently OR More than one type of ESG information disclosed less frequently than annually	★★
	More than one type of ESG information disclosed annually or more frequently	★★★
Listed Equity Active Ownership – Engagements		
	Selected response	**Level score**
	No	⭘
	Fewer than four items of information disclosed less frequently than annually	★
	Fewer than four items of information disclosed annually or more frequently OR Four or more items of information disclosed less frequently than annually	★★

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	Four or more items of information disclosed annually or more frequently	★★★
Listed Equity Active Ownership – Voting		
	Selected response	**Level score**
	'No'	⭘
	'Yes' and 'some voting decisions' less frequently than annually OR 'Yes' and 'only abstentions and votes against management' less frequently than annually	★
	'Yes' and 'all voting decisions' less frequently than annually OR 'Yes' and 'some voting decisions' more frequently than annually	★★
	'Yes' and 'all voting decisions' more frequently than annually OR 'Yes' and 'only abstentions and votes against management' more frequently than annually	★★★
Listed Equity - Incorporation		
	Selected response	**Level score**
	No	⭘
	Broad approach less frequently than annually	★
	Broad approach annually or more frequently OR Detailed explanation less frequently than annually	★★
	Detailed explanation annually or more frequently	★★★
Private Equity		
	Selected response	**Level score**
	No	⭘
	One type of information less frequently than annually	★
	One type of information annually or more frequent OR At least two types of information less frequently than annually	★★
	At least two types of information annually or more frequent	★★★
Property		
	Selected response	**Level score**
	No	⭘
	One type of ESG information disclosed less frequently than annually	★
	One type of ESG information disclosed annually or more frequently OR More than one type of ESG information disclosed less frequently than annually	★★

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	More than one type of ESG information disclosed annually or more frequently	★★★
Selection, Appointment and Monitoring (SAM)		
	Maximum score: Three ★ The assessment of SG 19 for SAM does not differentiate between if you disclose information to the public or if you do it to clients/beneficiaries only.	
	Selected response	**Level score**
	No	○
	One option	★
	Two options	★★
	Three (or more) options	★★★

CM 01	ASSESSMENT	
CM 01	The response to indicator CM 01 in the Closing Module is assessed as part of your score for the Strategy and Governance module. Please refer to the separate document covering the Closing Module for further details on indicator CM 01.	
	Indicator scoring methodology	
	Selected response	**Level score**
	"None of the above" or "Other" selected in CM 01.1	○
	One option selected from CM 01.1	★★
	Two options selected from CM 01.1	★★★

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PRI REPORTING FRAMEWORK 2019
Strategy and Governance

(Climate-related indicators only)

November 2018

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UNEP Finance Initiative
Changing finance, financing change

United Nations Global Compact

An investor initiative in partnership with UNEP Finance Initiative and UN Global Compact

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 identify which indicators are relevant to your organisation.

Top bar

Key information about each indicator is highlighted in the top bar, including the indicator status (mandatory or voluntary), the purpose of the indicator, and which PRI Principle it relates to.

	Indicator status	Purpose	Principle
xxx 01	*MANDATORY*	*CORE ASSESSED*	*PRI 2*

Indicator status

MANDATORY	Mandatory indicators reflect core practices. These responses will be made public and must be completed to submit the framework.
MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	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.
VOLUNTARY	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 to your organisation. Please refer to the logic box for more information.
Peering	These indicators are used to determine your peer groups for assessment purposes.
Core assessed	These indicators form the core of the assessment and represent the majority of your final assessment score.
Additional assessed	These indicators represent more advanced or alternative practices and contribute to a smaller part of your score.
Descriptive	These are open-ended narrative indicators, allowing you to describe your activities.

Underneath the indicator

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

xxx 01	**EXPLANATORY NOTES**
xxx 01.1	This provides guidance on how to interpret the sub-indicators, including examples of what can be reported.
xxx 01.2	
LOGIC	
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.
ASSESSMENT	
xxx 01	This provides a brief overview of the pilot assessment approach for this indicator.

xxx 01	**DEFINITIONS**
xxx 01	Specific terms that are used in the indicator are defined here.

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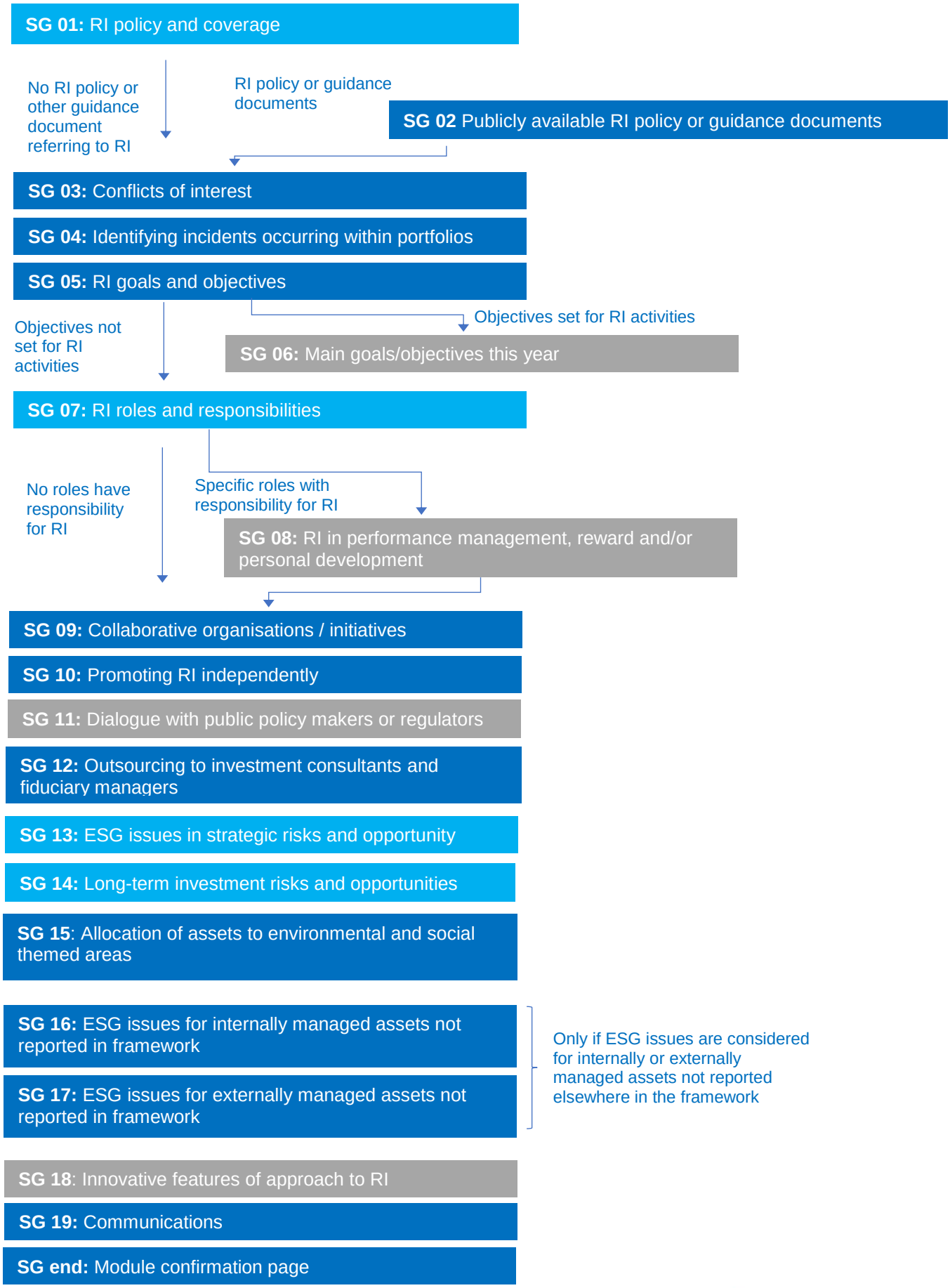
Pathways through the module



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PRI Principles for Responsible Investment

Preface

The purpose of the Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD) was to develop a set of recommendations that outlined consistent and reliable disclosures on climate-related financial risks, thereby providing investors, lenders, insurers and other stakeholders with information necessary to manage these risks and opportunities.

To support investors in making the recommended disclosures and demonstrating their relevant activity, the PRI has integrated new climate-related indicators based on the TCFD recommendations into the 2019 Reporting Framework. These indicators will be voluntary to report and voluntary to disclose and will not be assessed. Responses will be accessible in the form of a stand-alone climate transparency report that will assist your organisation in aligning with the TCFD recommendations.

The TCFD recommendations mapped against the PRI Reporting Framework

TCFD RECOMMENDATION	RELEVANT PRI INDICATOR
Governance	
a) Describe the board's oversight of climate-related risks and opportunities.	SG 7.5 CC SG 7.6 CC
b) Describe management's role in assessing and managing climate-related risks and opportunities.	SG 7.5 CC SG 7.7 CC
Strategy	
a) Describe the climate-related risks and opportunities the organisation has identified over the short, medium and long term.	SG 1.6 CC SG 1.8 CC
b) Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy and financial planning.	SG 1.6 CC
c) Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	SG 13.1
Risk Management	
a) Describe the organisation's processes for identifying and assessing climate-related risks.	SG 14.8 CC SG 14.9 CC
b) Describe the organisation's processes for managing climate-related risks.	SG 14.8 CC
c) Describe how processes for identifying, assessing and managing climate-related risks are integrated into the organisation's overall risk management.	SG 14.8 CC
Metrics and Targets	
a) Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process.	SG 14.6 CC
b) Disclose Scope 1, Scope 2 and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.	SG 14.6 CC
c) Describe the targets used by the organisation to manage climate-related risks and opportunities, and the performance against the targets.	SG 14.7 CC

To view a detailed summary of changes to the modules, please click here.

For any word limit in the module, please click here.

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SECTION

Climate-related disclosure indicators

SG 01 CC	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle GENERAL

	CLIMATE-RELATED DISCLOSURE INDICATOR	
SG 01.6 CC	Indicate the climate-related risks and opportunities that have been identified and factored into the investment strategies and products, within the organisation's investment time horizon.	
	Free text [500 words]	
SG 01.7 CC	Indicate whether the organisation has assessed the likelihood and impact of these climate risks?	
	❍ Yes	❍ No
SG 01.8 CC	Indicate the associated timescales linked to these risks and opportunities.	
	Free text [500 words]	
SG 01.9 CC	Indicate whether the organisation publicly supports the TCFD?	
	❍ Yes	❍ No, Explain the rationale; [200 words]
SG 01.10 CC	Indicate whether there is an organisation-wide strategy in place to identify and manage material climate-related risks and opportunities.	
	❍ Yes, Describe; [500 words]	❍ No
SG 01.11 CC	Describe how and over what time frame the organisation will implement an organisation-wide strategy that manages climate-related risks and opportunities.	
	Free text [500 words]	
SG 01.12 CC	Indicate the documents and/or communications the organisation uses to publish TCFD disclosures.	
	❒ Public PRI Climate Transparency Report ❒ Annual financial filings ❒ Regular client reporting ❒ Member communications ❒ Other (specify): _____	

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SG 01 CC	CLIMATE-RELATED DISCLOSURE EXPLANATORY NOTES
SG 01 CC	**This indicator provides signatories with an opportunity to outline their overall approach to climate-related risks and is aligned with the Recommendations of the Task Force on Climate-related Financial Disclosures (Area: Strategy).** **Note:** The Task Force recommendations relate to climate-related risks and opportunities that are most pertinent to the organisation's business activities, and, therefore, reporting should be reflective of this. See Table 1 (p. 10) of the Recommendations of the Task Force on Climate-related Financial Disclosures. **What are the TCFD recommendations?** The Financial Standards Board (FSB) Taskforce on Climate-Related Financial Disclosure (TCFD) recommendations provide a common international framework for companies and investors to translate information about climate change into financial metrics. **What does the TCFD recommend?** A voluntary series of recommendations clustered under four categories: governance, strategy, risk management and metrics. **Whom the recommendations are for?** Both companies and investors. The TCFD considers investors to be both users and the issuers of climate-relate disclosures. **Where should the disclosures take place?** In companies' and investors' regular financial filings (filings (e.g., annual report or periodic client reporting). To find out more on how your peers have responded on this practice, view our analysis in the climate change interactive snapshot report available on the Data Portal and the PRI website.
SG 01.6 CC	Within the organisation's current investment time horizon, provide details on the climate-related risks and opportunities that your organisation has identified and factored into its investment strategy and products. In addition, please indicate the organisation's investment time horizon. You may wish to provide further detail on the climate-related risks and opportunities linked to investment portfolios, asset classes, sectors and regions.
SG 01.8 CC	This indicator allows you to identify the time horizons linked to the climate-related risks and opportunities that the organisation has identified. Please indicate what timescale is relevant for each of the risks and opportunities identified by the organisation. You may like to include details on how the organisation assessed and determined the impact and likelihood of these risks.
SG 01.9 CC	This indicator considers the phrase '**publicly supports the TCFD recommendations**' to mean that your organisation has publicly endorsed the TCFD recommendations. **For example, you may be listed as an official supporter of the TCFD, you may have published documents/reports that state your** support, or you may report publicly on the climate-related indicators through the **PRI.**
SG 01.10 CC	Provide further information on your organisation-wide strategy currently in place, detailing the process of identifying and managing material climate-related risks and opportunities. You may also wish to provide details on some of these risks and opportunities that have been identified over the short, medium and long-term.

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SG 01.11 CC	Implementation of the TCFD recommendations is likely to occur over a multi-year period. This indicator allows you to detail the time frame and associated processes involved in implementing the recommendations within your organisation's organisations investment strategies, processes and activities. You may wish to use the following stages, as noted in the PRI's Asset Owner Guide to TCFD, to guide your response. 1) Getting started and establishing processes (year one) • Become familiar with the TCFD recommendations • Investigate business cases for TCFD and the approaches of peers • Establish board-level oversight and an internal climate-risk management process • Request that the CIO, consultants and managers consider climate-related risks • Establish an implementation and monitoring plan • Disclose strategy and governance approaches in the PRI's climate-risk indicators and/or annual report 2) In-depth assessment of potential portfolio exposure (year two) • Analyse portfolio holdings • Engage/assess the organisation's managers • Identify climate-scenario analyses, and consider where the concentrations of risk are likely to be and how they may affect the performance of investment portfolios over time • Identify and, where possible, disclose useful metrics for assessing climate-related risks and opportunities • Incorporate climate risk into risk identification and assessment processes • Updated disclosure in the PRI's climate-risk indicators and/or the organisation's annual report 3) Full integration with the risk management strategy (year three) • Full integration of TCFD recommendations within investment risk-identification and assessment processes • Integrate climate-scenario planning and disclose. Disclose how the organisation is integrating scenarios into its investment process • Expand sector coverage (where applicable) • Identify responses, including engagement and a tilt towards climate solutions • Report and reassess annually or at regular intervals
SG 01.12 CC	This indicator provides you with an opportunity to indicate where the organisation's full or partial TCFD-aligned disclosures are available. We consider 'publishing' in this context to mean that the information is available to clients/beneficiaries/trustees and/or the public.
LOGIC	
SG 01 CC	[SG 01.8 CC] will be applicable if "Yes" is selected in [SG 01.7 CC]. [SG 01.11 CC] will be applicable if "No" is selected in [SG 01.10 CC].

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SG 07 CC	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle GENERAL

	CLIMATE-RELATED DISCLOSURE INDICATOR			
SG 07.5 CC	Indicate the roles in the organisation that have oversight, accountability and/or management responsibilities for climate-related issues.			
	Roles present in the organisation	**Oversight/ accountability for climate-related issues**	**Assessment and management of climate-related issues**	**No responsibility for climate-related issues**
	Board members or trustees	❑	❑	❑
	Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Risk Officer (CRO), Investment Committee	❑	❑	❑
	Other chief-level staff or heads of departments	❑	❑	❑
	Portfolio managers	❑	❑	❑
	Investment analysts	❑	❑	❑
	Dedicated responsible investment staff	❑	❑	❑
	Investor relations	❑	❑	❑
	External managers or service providers	❑	❑	❑
	Other role, specify (1) _____	❑	❑	❑
	Other role, specify (2) _____	❑	❑	❑
SG 07.6 CC	For **board-level** roles that have **climate-related issue** oversight/accountability or implementation responsibilities, indicate how these responsibilities are executed.			
	Free text [500 words]			
SG 07.7 CC	For **management-level** roles that assess and manage **climate-related issues**, provide further information on the structure and processes involved.			
	Free text [500 words]			
	Indicate how the organisation engages external investment managers on the TCFD			

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SG 07.8 CC	recommendations and their implementation. ❒ Incorporation of TCFD into Annual Report ❒ Incorporation of TCFD into regular client reporting ❒ Request that investment managers complete PRI climate indicators ❒ Request responses to TCFD Fund Manager questions in the PRI Asset Owner Guide

SG 07 CC	EXPLANATORY NOTES
SG 07 CC	**This indicator is aligned with the Recommendations of the Task Force on Climate-related Financial Disclosures (Area: Governance).** To find out more on how your peers have responded on this practice, view our analysis in the **climate change interactive snapshot report** available on the Data Portal and the PRI website.
SG 07.6 CC	Provide details on how oversight/accountability and/or implementation responsibilities for climate-related issues are executed by board members. Information may include: • Processes and frequency with which the board/committees are informed about climate-related issues • How climate-related issues are considered when reviewing and guiding decision making • How the board/committees monitor and oversee progress on climate-related targets and goals
SG 07.7 CC	Provide details on the processes and structures used by management to assess and manage climate-related issues. Information may include: • A description of the associated organisational structure(s) • Whether management reports to the board or to a committee of the board • The process by which management is informed about climate-related issues • How management (through specific positions and/or management committees) monitors climate-related issues
SG 07.8 CC	For further information and access to the TCFD Fund Manager questions referenced in this indicator, please see the PRI's Guide for Asset Owners..
LOGIC	
SG 07 CC	[SG 07.5 CC] options will be auto-filled based on the roles that have been reported as existing within your organisation in [SG 07.1]. [SG 07.6 CC] will be applicable if "Board members or trustees" have climate-related oversight and/or implementation responsibilities, as reported in [SG 07.5 CC]. [SG 07.7 CC] will be applicable if chief-level staff have climate-related oversight and/or implementation responsibilities, as reported in [SG 07.5 CC]. [SG 07.8 CC] will be applicable if externally managed assets are reported in [OO 05.1].

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SG 07 CC	CLIMATE-RELATED DISCLOSURE INDICATOR DEFINITIONS
Management-level roles	According to the FSB Taskforce on Climate-related Financial Disclosure, 'management-level roles' refers to positions which an organisation views as executive or senior management positions, and which are generally separate from the board.

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SG 13 CC	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle GENERAL

	CLIMATE-RELATED DISCLOSURE INDICATOR
SG 13.1	Indicate whether the organisation carries out scenario analysis and/or modelling, and if it does, provide a description of the scenario analysis (by asset class, sector, strategic asset allocation, etc.). ❒ Yes, in order to assess future ESG factors Describe [50 words] _____ ❒ Yes, in order to assess future climate-related risks and opportunities Describe [50 words] _____ ❒ No, our organisation does not currently carry out scenario analysis and/or modelling
SG 13.4 CC	Describe how your organisation is using scenario analysis to manage climate-related risks and opportunities, including how the analysis has been interpreted, its results, and any future plans. ❒ Initial assessment Describe [Free text; 500 words] ❒ Incorporation into investment analysis Describe [Free text; 500 words] ❒ Inform active ownership Describe [Free text; 500 words] ❒ Other (specify): _____ Describe [Free text; 500 words]
SG 13.5 CC	Indicate who uses this analysis. ❒ Board members, trustees, C-level roles, Investment Committee ❒ Portfolio managers ❒ Dedicated responsible investment staff ❒ External managers ❒ Investment consultants/actuaries ❒ Other; specify _____
SG 13.6CC	Indicate whether your organisation has evaluated the potential impact of climate-related risks, beyond the investment time horizon, on its investment strategy. ❍ Yes. Describe Free text [500 words] ❍ No. Please explain the rationale Free text [500 words]
SG 13.7 CC	Indicate whether a range of climate scenarios is used. ❍ Yes, including an analysis based on a 2°C or lower scenario ❍ Yes, but not including an analysis based on a 2°C or lower scenario ❍ No, a range is not used

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SG 13.8 CC	Indicate the climate scenarios your organisation uses.		
	Provider	**Scenario Name**	**Scenario used**
	Energy transition scenarios		
	IEA	Beyond 2 Degrees Scenario (B2DS)	❑
		Energy Technology Perspectives (ETP) 2 Degrees scenario	❑
		Sustainable Development Scenario (SDS)	❑
		New Policy Scenario (NPS)	❑
		Current Policy Scenario (CPS)	❑
	IRENA	RE Map	❑
	Greenpeace	Advanced Energy [R]evolution	❑
	Institute for Sustainable Development	Deep Decarbonisation Pathway Project (DDPP)	❑
	Bloomberg	BNEF reference scenario	❑
	Physical climate scenarios		
	IPCC	Representative Concentration Pathway (RCP) 8.5	❑
		RPC 6	❑
		RPC 4.5	❑
		RPC 2.6	❑
	Other		
	Other	Other (1); specify: _____	❑
		Other (2); specify: _____	❑
		Other (3); specify: _____	❑

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SG 13	EXPLANATORY NOTES
SG 13	**This indicator is aligned with the Recommendations of the Task Force on Climate-related Financial Disclosures (Area: Strategy).** To find out more on how your peers have responded on this practice, view our analysis in the **climate change interactive snapshot report** available on the Data Portal and the PRI website.
SG 13.1	Scenario analysis that incorporates factors representing the investment impact of future trends, including their risk profile at a portfolio level. For example, resource scarcity, technological developments. For many investors, the most significant effects of climate change are likely to arise over the medium to long term, with their timing and magnitude remaining uncertain. This makes it challenging to understand the implications from an investment perspective. Scenario analysis is a useful tool for companies and investors to understand the strategic implications of climate-related risks and opportunities. More industry work is needed on scenarios, particularly reference scenarios. The difference between 'ESG factors' and 'climate-related risks and opportunities': in this indicator, 'climate-related risks and opportunities' refers to the real and potential impact of climate change, including physical and transitional risks and the resulting opportunities. Refer to Appendix 1 of Implementing the Recommendations of the Task Force on Climate-related Financial Disclosures.
SG 13.4 CC	Climate-related scenario analysis can be used to guide and improve an organisation's ability to make investment decisions, specifically the initial assessment of a potential investment can be incorporated into an investment analysis and/or inform active ownership activities. Further, this indicator allows you to provide further details on how the analysis has been interpreted, the results of its application, and any future plans with regards to scenario analysis.
SG 13.6 CC	This indicator allows you to describe whether your organisation evaluates the impact of climate-related risks that may be relevant beyond the organisation's identified investment time horizon. Where any risks have been evaluated, describe these risks, and highlight the associated time scales.
SG 13.7 CC	Option **'Analysis of a 2°C or lower scenario'** relates to the transition to a lower-carbon economy consistent with a 2°*C* or lower scenario.
SG 13.8 CC	Further guidance provided by the FSB Task Force includes a supplementary technical guide on The Use of Scenario Analysis in Disclosure of Climate-Related Risks and Opportunities. Specifically, specifically information on a number of scenarios is available on page 17 of this guide. A directory of climate-scenario tools developed by service providers is available here. The PRI is publicly supporting a number of tools and initiatives: ▪ The Paris Agreement Capital Transition Assessment (PACTA) tool, which provides portfolio-level analysis of transition risks for listed risk in equities and corporate bonds, and which uses asset-level data. ▪ The Transition Pathway Initiative (TPI) — sector-level analysis of companies' management of carbon emissions and their alignment with the Paris Agreement. The TPI uses company-disclosed data. ▪ 2 Degrees of Separation — company and sector-level analysis of the oil and gas sector, using asset-level data
LOGIC	
SG 13 CC	[SG 13.4 CC – 8 CC] are applicable if "'Yes, in order to assess future climate-related risks and opportunities". is selected in [SG 13.1]

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SG 14	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle GENERAL

	CLIMATE-RELATED DISCLOSURE INDICATOR
SG 14.1	Some investment risks and opportunities arise as a result of **long-term trends**. Indicate which of the following are considered. ❒ Changing demographics ❒ Climate change ❒ Resource scarcity ❒ Technological developments ❒ Other, specify (1) ____ ❒ Other, specify (2) ____ ❒ None of the above, please explain why not [Free text; 200 words] _____
SG 14.3	Indicate which of the following tools your organisation uses to manage climate-related risks and opportunities. ❒ Scenario analysis ❒ Disclosures on emissions risks to clients/trustees/management/beneficiaries ❒ Climate-related targets ❒ Encouraging internal and/or external portfolio managers to monitor emissions risks ❒ Emissions-risk monitoring and reporting are formalised into contracts when appointing managers ❒ Weighted average carbon intensity ❒ Carbon footprint (scope 1 and 2) ❒ Portfolio carbon footprint ❒ Total carbon emissions ❒ Carbon intensity ❒ Exposure to carbon-related assets ❒ Other emissions metrics ❒ Other, specify ____ ❒ None of the above, please explain why not _____
SG 14.6 CC	Provide further details on the key metric(s) used to assess climate-related risks and opportunities.

Metric Type	Coverage	Purpose	Metric Unit	Methodology
Autofill from CC selections in [SG 14.4]	Dropdown options - All assets - Majority of			

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		assets - Minority of assets			
	[Same as above]	[Same as above]			
	[Same as above]	[Same as above]			
	[Same as above]	[Same as above]			
	[Same as above]	[Same as above]			

SG 14.7 CC

Describe in further detail the key targets.

Target type	Timeframe	Description	Attachments
(Absolute / Intensity based dropdown)			
[Same as above]			
[Same as above]			
[Same as above]			
[Same as above]			

SG 14.8 CC

Indicate whether climate-related risks are integrated into overall risk management and explain the risk-risk management processes used for identifying, assessing and managing climate-related risks.

- ❍ Processes for climate-related risks are integrated into overall risk management (please describe) *Free text [500 words]*
- ❍ Processes for climate-related risks are not integrated into overall risk management (please describe) *Free text [500 words]*

SG 14.9 CC

Indicate whether your organisation undertakes active ownership activities to encourage TCFD adoption.

- ❍ Yes (please describe). *Free text [500 words]*
- ❍ No, we do not engage in active ownership activities.

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SG 14	DEFINITIONS
Weighted Average Carbon Intensity	Portfolio's exposure to carbon-intensive companies, expressed in tonnes CO2e / $M revenue. *Metric recommended by the FSB Task Force.*
Carbon Intensity	Volume of carbon emissions per million dollars of revenue (carbon efficiency of a portfolio), expressed in tonnes CO2e / $M revenue.
Total Carbon Emissions	The absolute greenhouse gas emissions associated with a portfolio, expressed in tonnes CO2e.
(Portfolio) Carbon Footprint	Total carbon emissions of a portfolio, normalised by the market value of the portfolio, expressed in tonnes CO2e / $M invested.
Exposure to Carbon-Related Assets	The amount or percentage of carbon-related assets in the portfolio, expressed in $M or as a percentage of the current portfolio value.

	EXPLANATORY NOTES
SG 14	**This indicator is aligned with the Recommendations of the Task Force on Climate-related Financial Disclosures (Area: Risk Management, Metrics and Targets).** To find out more on how your peers have responded on this practice, view our analysis in the **climate change interactive snapshot report** available on the Data Portal and the PRI website.
SG 14.4	Activities to measure and reduce the organisation's own carbon footprint should not be described here, unless they refer to buildings which the organisation occupies and reports on as part of a directly managed property portfolio.
SG 14.6 CC	Provide details on the key metrics used to measure and manage climate-related risks and opportunities. Metrics should be provided for historical periods and should cover the greater proportion of the organisation's AUM. You can provide up to five entries. In the appropriate columns, please provide the following details; *Metric Type* This information is auto-filled from response in [SG 14.4]. *Coverage* • Indicate whether the metric is applicable to a minority, to a majority or to all the assets under management. *Purpose* Describe how the metric is used, e.g., inform investment decisions, monitoring. You may wish to include: • whether and how related performance metrics are incorporated into remuneration policies. *Metric Unit* Indicate the unit of measurement used, e.g., USD per tonne of carbon. *Methodology* You may wish to include information that covers the following:

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	• the methodology used to calculate or estimate figures of the key metric identified; • how this metric has trended, detailing any changes that have occurred over time; • whether this metric information is shared with clients/beneficiaries; • if relevant, indicate any weaknesses or limitations with the metric.
SG 14.7 CC	In the appropriate columns, please provide the following details: *Targets* An absolute target considers the total reduction in emissions over a period, for example, to reduce emissions by a number of tonnes of $CO2_e$. In comparison, an intensity target considers the reduction in emissions **relative to a measurement of business activity**, for example, reducing emissions by a number of tonnes of $CO2_e$ per unit of revenue. *Timeframe* Indicate the timeframes for each target. *Description* Provide a description of the target, including information on the following: • any key performance indicators used to assess progress against defined targets; • the methodology used to calculate the targets (ensure. Ensure that the target denominator is included); • any anticipated regulatory requirements, market constraints or other goals that may inform the targets; If relevant, indicate any weaknesses or limitations with the target and/or its methodology that have been identified. The PRI acknowledges that more industry work is needed on metrics. It is for this reason that the indicator provides the opportunity to report on several metrics and to give further context on each metric. To find out more on how your peers have responded on this practice, view our analysis and visualisation in the climate change interactive snapshot report available on the Data Portal and the PRI website.
SG 14.8 CC	Describe how your organisation's processes for identifying, assessing and managing climate-related risks are integrated into overall risk management systems. You may include details on the following: • how the significance of climate-related risks in relation to other risks is determined • whether the issue of materiality has been assessed in relation to identified climate-related risks. • Whether existing and emerging regulatory requirements related to climate change are considered. • a description of the processes used for assessing the potential size and scope of identified climate-related risks • definitions of risk terminology used, or references to existing risk classification frameworks used • how decisions to mitigate, transfer, accept and/or control climate-related risks are made in managing processes • How the issue of materiality has been assessed and informed

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SG 14.9 CC	Describe any engagement activities with investee companies that aim to encourage better disclosure and practices that relate to climate-related risks, with the goal of improving data availability and enabling an enhanced ability to access and assess climate-related risks. **Investment Managers** You may wish to include a description of how material climate-related risks for each product or investment strategy are identified and assessed. To find out more on how your peers have responded on this practice, view our analysis and visualisation in the climate change interactive snapshot report available on the Data Portal and the PRI website.
LOGIC	
SG 14	[SG 14.6 CC] will be applicable if at least one of the following options is selected in [SG 14.3]; • Climate-related targets • Weighted average carbon intensity • Carbon footprint • Portfolio carbon footprint • Total carbon emissions • Carbon intensity • Exposure to carbon-related assets • Other emissions metrics [SG 14.7 CC] will be applicable if “Climate-related targets” is reported in [SG 14.3]. [SG 14.9 CC] will be applicable if listed equity or fixed income assets are reported in [OO 05.1].

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PRI REPORTING FRAMEWORK 2019
Indirect — Manager Selection, Appointment and Monitoring

November 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 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), the purpose of the indicator and which PRI Principle it is related.

	Indicator status	Purpose	Principle
xxx 01	*MANDATORY*	*CORE ASSESSED*	*PRI 2*

Indicator status

MANDATORY	Mandatory indicators reflect core practices. These responses will be made public and must be completed to submit the framework.
MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	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 may also contain commercially sensitive information.
VOLUNTARY	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.
Peering	These indicators are used to determine your peer groups for assessment purposes.
Core assessed	These indicators form the core of the assessment and represent the majority of your final assessment score.
Additional assessed	These indicators represent more advanced or alternative practices and account for a smaller part of your score.
Descriptive	These are open-ended narrative indicators, allowing you to describe your activities.

Underneath the indicator

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

xxx 01	EXPLANATORY NOTES
xxx 01.1	This provides guidance on how to interpret the sub-indicators, including examples of what could be reported.
xxx 01.2	
LOGIC	
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.
ASSESSMENT	
xxx 01	This provides a brief overview of the pilot assessment approach for this indicator.

xxx 01	DEFINITIONS
xxx 01	Definitions of specific terms that are used in the indicator are defined here.

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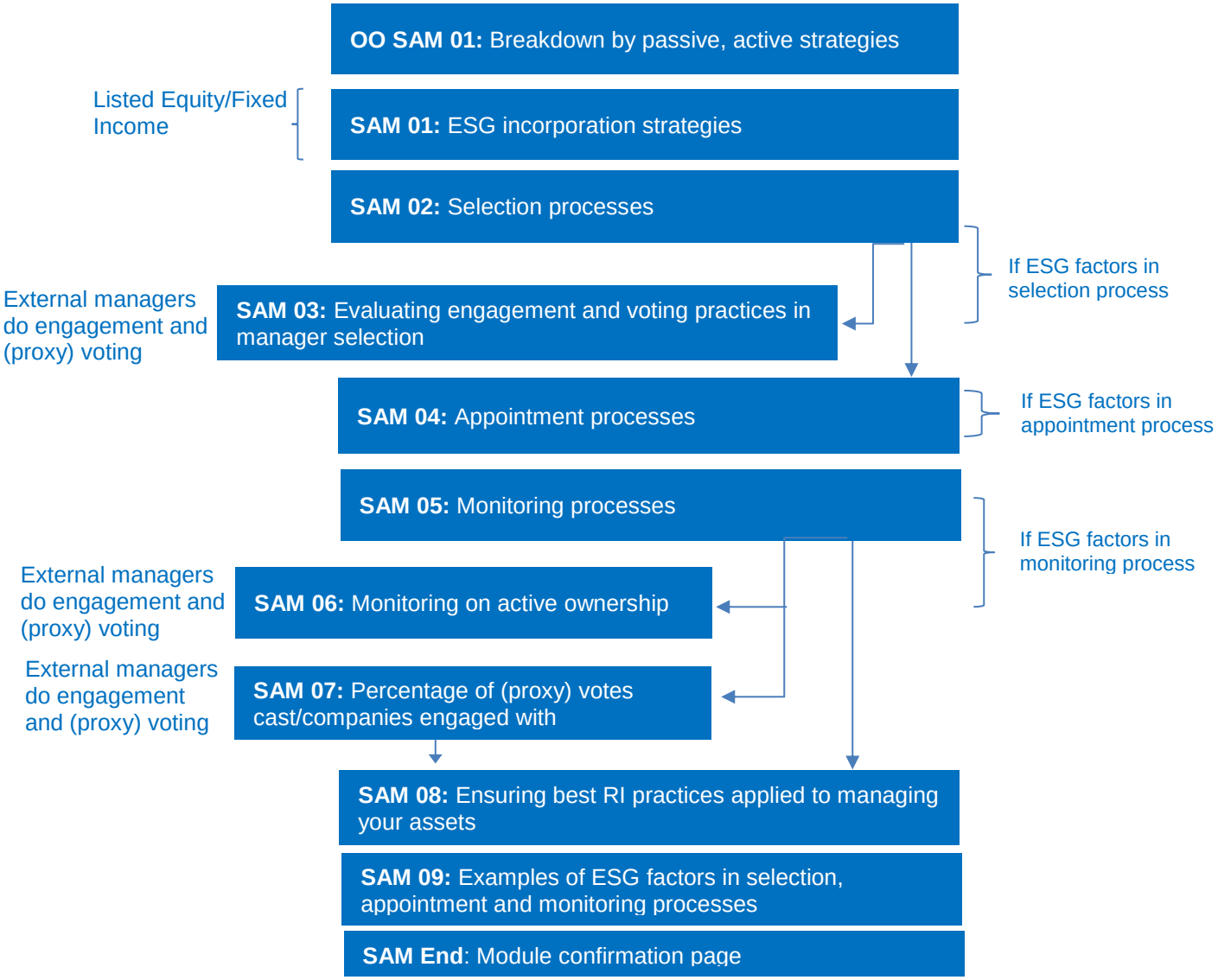
Pathways through the module



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Preface

This module is designed for investors who outsource some or all of their investment activities to external investment managers. Pension funds, insurance companies, sovereign wealth funds, foundations and endowments are frequently indirect investors, although they may also have direct investments. Investment managers may also outsource some of their investment activities (e.g. in multimanager or fund-of-fund structures) and those assets should be reported in this module.

Investors who have externally managed listed equities but engage and/or vote in-house, or who instruct specialist service providers to vote and/or engage on their behalf, should report these active ownership activities within the 'Listed Equity Active Ownership (LEA)' module. Indicators on engagement and (proxy) voting in this module will only be displayed in the online tool if you indicate that your external managers perform these functions.

Investors who hire asset consultants (and/or fiduciary managers) to support them in selecting, appointing and monitoring external managers will also be able to report their own or their asset consultant's responsible investment activities here.

Some indicators and reporting options are broken down by asset class. In these cases, you will be able to choose to report separately by each individual asset class and explain any specific implementation differences between asset classes in open-ended indicators.

To support you in reporting to this module, the PRI has developed a tool to help you collect information from your consultant(s) and fiduciary manager: link.

**Note 1: While retail banks and fund-of-fund investors may also be classed as indirect investors, their characteristics differ in some areas from the organisations covered in this module. A separate module for these investors may be developed by the PRI in the future. Until then, these investors should report using this module and use the open-ended indicators to explain how they implement responsible investment.*

**Note 2: Inclusive Finance. There is a separate module for indirect investors in Inclusive Finance (IFI). This module is mandatory to report for signatories to the Principles for Investors in Inclusive Finance (PIIF) and voluntary for all other investors holding inclusive finance assets.*

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Summary of updates

The SAM module was redeveloped in 2016 and signatories reported on the new version for the first time during the 2017 reporting cycle. With signatories' continuous feedback, a few amendments have been made to this 2019 version. Prefilling will be available for indicators that did not change significantly since last year.

The revised SAM module offers more targeted indicators to drive the following:

- asset owner (AO) movement from awareness of ESG considerations to creating impact via their managers and mandates
- incorporation of ESG characteristics into investment strategy;
- a shift from reliance on qualitative dialogue between AOs and investment managers (IMs) to quantified, positive ESG impact in AO-IM collaboration;
- a clearer link between the ESG position at a portfolio level and the impacts (such as return and risks);
- increased understanding of the role of asset consultants, and data capture on consultant selection practices in ESG context;
- signatory education on how AOs reward ESG incorporation and thus encourage improved practices.

2018 Indicator	Update summary
SAM 04	SAM 04.1 Selection options reworded and removed. SAM 04.3 moved to the OO module. Some sub-indicators renumbered. Explanatory notes added.
SAM 05	Selection options and explanatory notes added.

To view a detailed summary of changes to the module, please click here.

For any word limit in the module, please click here.

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SECTION

Listed equity (LE) and Fixed income (FI)

OVERVIEW

SAM 01	Indicator status	Purpose	Principle
	MANDATORY	GATEWAY	PRI 1

SAM 01	INDICATOR
SAM 01.1	Indicate which of the following ESG incorporation strategies you require your external manager(s) to implement on your behalf for **all** your listed equity and/or fixed income assets:

	All assets	LE	Fixed income —SSA	Fixed income — Corporate (financial)	Fixed income — Corporate (non-financial)	Fixed income — Securitised
Active investment strategies						
Screening	❑	❑	❑	❑	❑	❑
Thematic	❑	❑	❑	❑	❑	❑
Integration	❑	❑	❑	❑	❑	❑
None of the above	❑	❑	❑	❑	❑	❑
Passive investment strategies						
Screening	❑	❑	❑	❑	❑	❑
Thematic	❑	❑	❑	❑	❑	❑
Integration	❑	❑	❑	❑	❑	❑
None of the above	❑	❑	❑	❑	❑	❑

SAM 01.2	Additional information [OPTIONAL]

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PRI Principles for Responsible Investment

SAM 01	EXPLANATORY NOTES
SAM 01.1	Please report the strategies your require your managers to implement for all your listed equity and/or fixed income assets, not just those that are ESG-specific funds or products. For listed equities and/or fixed income, signatories may choose not to address ESG factors because of the characteristics of a specific investment strategy. Moreover, both in active and passive strategies, ESG incorporation may be done by one or more strategies. These are explained clearly in the definition section. To find out more on how your peers have responded on this practice, view our analysis and visualisation in the asset owner interactive data report available on the Data Portal and the PRI website.
LOGIC	
SAM 01	Your response to [OO SAM 01.1] determines which parts of indicator [SAM 01.1] are applicable; the SAM 01.1 indicator has Active and Passive investment strategy sections. For example, if you report using passive investment strategies in relation to Listed Equity in [OO SAM 01.1], you will only see the part of [SAM 01.1] that is relevant to passive investment strategies for Listed Equity.

SAM 01	DEFINITIONS
ESG incorporation	
Incorporation of ESG factors into investment analysis and decision-making processes is covered in Principle 1 of the PRI. Throughout the Reporting Framework, we refer to ESG incorporation as the review and use of ESG information in the investment decision-making process. The Reporting Framework addresses four ways in which ESG incorporation can be done: 1. screening; 2. sustainability themed investment (also called environmentally and socially themed investment); 3. integration; and/or 4. a combination of the above. Assets subject to an engagement approach only and not subject to any of the above strategies should not be included in ESG incorporation. **To improve standardisation and communication in the responsible investment industry, the PRI has aligned its definitions with those of the Global Sustainable Investment Alliance. These are presented below for convenience.**	
Screening of investments	The definitions of the three types of screening in the Reporting Framework are as follows: a. negative/exclusionary screening: The exclusion from a fund or portfolio of certain sectors, companies or practices based on specific ESG criteria; b. positive/best-in-class screening: Investment in sectors, companies or projects selected for positive ESG performance relative to industry peers; c. norms-based screening: Screening of investments against minimum standards of business practice based on international norms. Norms-based screening involves either:

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	1. defining the investment universe based on investees' performance on international norms related to responsible investment/ESG factors; or 2. excluding investees from portfolios after investment if they are found following research, and sometimes engagement, to contravene these norms. Such norms include but are not limited to the UN Global Compact Principles, the Universal Declaration of Human Rights, International Labour Organization standards, the United Nations Convention Against Corruption and the OECD Guidelines for Multinational Enterprises.
Thematic/ sustainability themed investing	Investment in themes or assets specifically related to sustainability (for example, clean energy, green technology and sustainable agriculture).
Integration of ESG factors	The systematic and explicit inclusion by investment managers of environmental, social and governance factors into traditional financial analysis.
For further detail on these definitions, please see separate Main Definitions document.	

Investment decision-making processes

For the purposes of the Reporting Framework, investment decision-making processes refers to research, analysis and other processes that lead to a decision to make or retain an investment (i.e. to buy, sell or hold a security) or to commit capital to an unlisted fund or other asset.

(Proxy) voting decisions and engagement activities are not classified as investment decisions for the purposes of the Reporting Framework. These decisions fall under Principle 2 of the PRI, relating to active ownership, and within the Listed Equity—Active Ownership (LEA) module of the Framework.

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SELECTION

SAM 02	Indicator status MANDATORY	Purpose CORE ASSESSED / ADDITIONAL ASSESSED	Principle PRI 1

SAM 02	INDICATOR						
SAM 02.1	Indicate what RI-related information your organisation typically covers in the majority of selection documentation for your external managers						
		All assets	Asset class 1	Asset class 2	Asset class 3	Asset class 4	Asset class 5
	Your organisation's investment strategy and how ESG objectives relate to it	❑	❑	❑	❑	❑	❑
	ESG incorporation requirements	❑	❑	❑	❑	❑	❑
	ESG reporting requirements	❑	❑	❑	❑	❑	❑
	Other _____	❑	❑	❑	❑	❑	❑
	No RI information covered in the selection documentation	❑	❑	❑	❑	❑	❑
SAM 02.2	Explain how your organisation evaluates the investment manager's ability to align between your investment strategy and their investment approach						
		All assets	Asset class 1	Asset class 2	Asset class 3	Asset class 4	Asset class 5
	Strategy						
	Assess the time horizon of the investment manager's offering vs. your/beneficiaries' requirements	❑	❑	❑	❑	❑	❑
	Assess the quality of investment policy and its references to ESG	❑	❑	❑	❑	❑	❑
	Assess the investment approach and how ESG objectives are implemented in the investment process	❑	❑	❑	❑	❑	❑

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	Review the manager's firm-level vs. product-level approach to RI	❑	❑	❑	❑	❑	❑
	Assess the ESG definitions to be used	❑	❑	❑	❑	❑	❑
	Other, specify ____	❑	❑	❑	❑	❑	❑
	None of the above	❑	❑	❑	❑	❑	❑
	ESG people/oversight						
	Assess the ESG expertise of investment teams	❑	❑	❑	❑	❑	❑
	Review the oversight and responsibilities of ESG implementation	❑	❑	❑	❑	❑	❑
	Review how ESG implementation is incentivised	❑	❑	❑	❑	❑	❑
	Review the manager's RI-promotion efforts and engagement with the industry	❑	❑	❑	❑	❑	❑
	Other, specify ____	❑	❑	❑	❑	❑	❑
	None of the above	❑	❑	❑	❑	❑	❑
	Process/portfolio construction/investment valuation						
	Review the process for ensuring the quality of ESG data used	❑	❑	❑	❑	❑	❑
	Review and agree the use of ESG data in the investment decision making process	❑	❑	❑	❑	❑	❑
	Review and agree the impact of ESG analysis on investment decisions	❑	❑	❑	❑	❑	❑
	Review and agree ESG objectives (e.g. risk reduction, return seeking, real-world impact)	❑	❑	❑	❑	❑	❑
	Review and agree manager's ESG risk framework	❑	❑	❑	❑	❑	❑
	Review and agree ESG risk limits at the portfolio level (portfolio construction) and other ESG objectives	❑	❑	❑	❑	❑	❑

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	Review how ESG materiality is evaluated by the manager	❑	❑	❑	❑	❑	❑
	Review process for defining and communicating on ESG incidents	❑	❑	❑	❑	❑	❑
	Review and agree ESG reporting frequency and detail	❑	❑	❑	❑	❑	❑
	Other, specify ____	❑	❑	❑	❑	❑	❑
	None of the above	❑	❑	❑	❑	❑	❑

SAM 02.3

Indicate the selection process and its ESG/RI components

❑ Review ESG/RI responses to RfP, RfI, DDQ etc.

❑ Review responses to PRI's Limited Partners' Responsible Investment Due Diligence Questionnaire (LP DDQ)

❑ Review publicly available information on ESG/RI

❑ Review assurance process on ESG/RI data and processes

❑ Review PRI Transparency Reports

❑ Request and discuss PRI Assessment Reports

❑ Meetings with the potential shortlisted managers covering ESG/RI themes

❑ Site visits to potential managers' offices

❑ Other, specify ____

SAM 02.4

When selecting external managers does your organisation set or use any of the following:

	All assets	Asset class 1	Asset class 2	Asset class 3	Asset class 4	Asset class 5
ESG performance development targets	❑	❑	❑	❑	❑	❑
ESG score	❑	❑	❑	❑	❑	❑
ESG weight	❑	❑	❑	❑	❑	❑
Real economy targets	❑	❑	❑	❑	❑	❑
Other RI considerations ____	❑	❑	❑	❑	❑	❑
None of the above	❑	❑	❑	❑	❑	❑

SAM 02.5

Describe how the ESG information reviewed and discussed affects the selection decision making process.

[OPTIONAL]

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SAM 02	EXPLANATORY NOTES
SAM 02	**This indicator is aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations.** This indicator seeks information about the typical processes in place and actions taken by your organisation during manager selection (even if managers have not been selected or reappointed during the reporting year). If these processes are implemented only in a minority of cases, do not report them here in the pre-selected options, but do describe these cases in the Additional Information field at the end of this indicator. For our most recent guidance on manager selection, please see 'Asset owner guide: Enhancing manager selection with ESG insight' by the PRI, March 2018. You may also find these resources useful: *Crafting an investment strategy – a process guidance for asset owners* For examples of how asset owner signatories are incorporating ESG considerations into their selection, appointment and monitoring of external managers, see *Aligning Expectations: Guidance for asset owners on incorporating ESG factors into manager selection, appointment and monitoring* by the PRI, February 2013. To find out more on how your peers have responded on this practice, view our analysis and visualisation in the asset owner interactive data report available on the Data Portal and the PRI website.
SAM 02.1	Selection documentation can include RFPs, RFI, DDQ and other questionnaires and selection surveys, Investment and Operational Due Diligence processes. Select 'Investment strategy and how ESG objectives relate to it' if your organisation includes your investment strategy, components of it, investment beliefs or principles in the selection documentation. This can also include explanation as to how your organisation's investment strategy links to your ESG objectives.
SAM 02.2	The options containing the wording 'Review and agree…' refer to reviewing a certain aspect of the potential investment manager's approach and concluding that this approach is sufficiently enough aligned with your own beliefs, strategy and policy. 'Assess the time horizon of the investment manager's offering vs. your/beneficiaries' requirements' – this also includes assessing how the time horizon fits with your organisation's ESG objectives and how it's reflected with the investment managers' portfolio turnover rate. 'Assess the quality of the investment policy' – this could mean reviewing the references to ESG, the coverage of the policy in terms of regions, products, strategies and asset classes also understanding how any changes in the policy are implemented. 'Review the manager's firm-level vs. product-level approach to RI' – this can include ensuring that the top-level ESG strategy of the firm is consistent with how the manager is implementing ESG on a product-level. 'Assess the ESG definitions to be used' can also include discussions of the scope of what is understood with ESG and what it entails. 'Review how ESG implementation is enforced /ensured' – this could mean ensuring availability for training on ESG. 'Review the RI-promotion and engagement with the industry to enhance RI implementation' – The investment manager might for instance be providing or supporting education or training on RI to clients, consultants and other stakeholders, encouraging better transparency and disclosure of RI practices across the industry, speaking publicly at events and conferences to promote RI, supporting academia on RI research etc. 'Review and agree the investment decision making process' – understanding how ESG is integrated in the decision-making, asking for a recent example for when ESG factors influenced an investment decision. Also important to understand – who makes a decision – a committee, individual, algorithm, or another party. 'Assess ESG expertise of investment teams' - understand if there is an ESG team, specialists or if ESG function is integrated throughout the investment team. If there is a separate ESG team – review where is it based and how it works together with the rest of the organisation. If ESG responsibilities are integrated throughout the teams – understand how the team is trained and

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	recruited to ensure that they have the ESG skills and competencies. This may include a discussion of, for example, any differences between mandates, strategies or markets. 'Review and agree the impact of ESG analysis on investment decisions' - Understanding the investment process – is the investment manager using fundamental analysis or thematic, this determines how ESG materiality is identified, and is the process driven by qualitative or quantitative factors. 'Review and agree ESG objectives (e.g. risk reduction, return seeking, real-world impact)'– This could include identifying the ESG areas that your organisation wants to prioritise and what the desired outcome is within the given investment horizon, and then agreeing how this should be linked with the investment manager's investment strategy, investment policy, investment process, and performance review. ESG objectives could include ESG risk reduction, exclusions, ESG considerations in the investment decision making process and other integration objectives, particular ESG related outcomes and real-world impact, emissions reductions or similar. 'Review and agree manager's ESG risk framework' – understanding how the manager identifies, measures and manages ESG risk 'Review and agree ESG risk limits at the portfolio level (portfolio construction) and other ESG ' – looking at how investment manager sees ESG returns and risk and if there is an additional ESG objective, assessing if and what is the ESG contribution to risk-return profile of the portfolio *Investment Policy: Process & Practice – A Guide for Asset Owners* can be found here.
SAM 02.3	Meetings with the potential shortlisted managers can include video conference and other multimedia meetings. Site visits to potential managers' offices can also be done through a third party and/or during the appointment phase. 'Review assurance process' refers to reviewing the assurance process that the investment manager applies to its financial or other reports. Reviewing this process would ideally result in you as an organisation being more confident in the data and information that the investment manager presents to you. PRI's *Limited Partners' Responsible Investment Due Diligence Questionnaire* (LP DDQ) can be found here.

LOGIC			
SAM 02	This indicator is applicable for (asset classes) where: • You selected (asset class) in OO 11.2 (you do RI implementation via external managers), and: • You selected (asset class) in OO 12.1 (modules to report on)		
ASSESSMENT			
SAM 02	Maximum score: 18 ★ per asset class. Please note that SAM 02.2 is worth up to 9 ★, of which 6 ★ are core and 3 ★ are additional.		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	Core Assessed		
	SAM 02.1		
	"No RI information covered in the RFPs"	○	
	One option selected	★	
	Two options selected	★★	

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	Three options or more selected	★★★	
	Core Assessed		
	SAM 02.2 – Strategy (a)		
	"None of the above" selected	○	
	One option selected	★	
	Two options selected	★★	
	Three options or more selected	★★★	
	Additional Assessed		
	SAM 02.2 – ESG people/oversight (b)		
	"None of the above" selected	○	
	One option selected	★	
	Two options selected	★★	
	Three options or more selected	★★★	
	Core Assessed		
	SAM 02.2 – Process/portfolio construction/investment valuation (c)		
	"None of the above" selected	○	
	One or two options selected	★	
	Three or four options selected	★★	
	Five or more options selected	★★★	
	Core Assessed		
	SAM 02.3		
	One option selected	★	
	Two options selected	★★	
	Either "Meetings with the potential shortlisted managers" or "Site visits to potential managers offices" selected	★★★	
	Additional Assessed		
	SAM 02.4		
	"None of the above"	○	

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	Any option selected	★★★	

DEFINITIONS	
ESG objectives	This could be adhering to code of conducts, beliefs, strategy, policy etc.; investment restrictions; integration practices; engagement; voting; reporting.
Investment strategy	An investment strategy is a systematic plan that guides a financial institution's investment decisions. This may include asset allocation, buy and sell guidelines and risk guidelines such as ESG risks. This can also include investment beliefs understood as a financial institution's key convictions about how financial markets work, while considering human behaviour. This may include investment process beliefs, organisational beliefs and ESG beliefs.
Real economy targets	The extent to which an investment positively or negatively impacts the real economy, including environment, social and governance impacts, additionally to financial return.

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SAM 03	Indicator status MANDATORY	Purpose ADDITIONAL ASSESSED	Principle PRI 2

SAM 03	INDICATOR						
SAM 03.1	Indicate how your organisation typically evaluates the manager's active ownership practices in the majority of the manager selection process.						
		All assets	Asset class 1	Asset class 2	Asset class 3	Asset class 4	Asset class 5
	Engagement						
	Review the manager's engagement policy	❑	❑	❑	❑	❑	❑
	Review the manager's engagement process (with examples and outcomes)	❑	❑	❑	❑	❑	❑
	Ensure whether engagement outcomes feed back into the investment decision-making process	❑	❑	❑	❑	❑	❑
	Other engagement issues in your selection process; specify _____	❑	❑	❑	❑	❑	❑
	None of the above	❑	❑	❑	❑	❑	❑
	(Proxy) voting						
	Review the manager's voting policy	❑	❑	n/a	n/a	n/a	n/a
	Review the manager's ability to align voting activities with clients' specific voting policies	❑	❑	n/a	n/a	n/a	n/a
	Review the manager's process for informing clients about voting decisions	❑	❑	n/a	n/a	n/a	n/a
	Ensure whether voting outcomes feed back into the investment decision-making process	❑	❑	n/a	n/a	n/a	n/a

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	Review the number of votes cast as a percentage of ballots/AGMs or holdings and available rationale	❑	❑	n/a	n/a	n/a	n/a
	Other voting issues in your selection process; specify _____	❑	❑	n/a	n/a	n/a	n/a
	None of the above	❑	❑	n/a	n/a	n/a	n/a

SAM 03.2	Describe how you assess if the manager's engagement approach is effective. ❑ Impact on investment decisions ❑ Financial impact on target company or asset class ❑ Impact on ESG profile of company or the portfolio ❑ Evidence of changes in corporate practices (i.e. ESG policies and implementation activities) ❑ Other, specify _____ ❑ None of the above
SAM 03.3	Describe how you assess if the manager's voting approach is effective/appropriate ❑ Impact on investment decisions ❑ Impact on ESG profile of company or the portfolio ❑ Evidence of changes in corporate practices (i.e. ESG policies and implementation activities) ❑ Other, specify _____ ❑ None of the above
SAM 03.4	Additional information [OPTIONAL]

SAM 03	**EXPLANATORY NOTES**
SAM 03	This indicator seeks information about the typical processes in place and actions taken by your organisation during manager selection focusing specifically on engagement and voting practice. Report here also if you require your managers to report on any of the options. Review the manager's engagement process discussing in what situations the manager engages. Request examples and outcomes. Review how the engagement outcomes feed back into the investment decision-making process. PRI's *Crafting an investment strategy – a process guidance for asset owners* provides guidance on how asset owners might evaluate a manager's active ownership processes To find out more on how your peers have responded on this practice, view our analysis and visualisation in the asset owner interactive data report available on the Data Portal and the PRI website.

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LOGIC	
SAM 03	[SAM 03] is applicable if you report requiring external managers to engage or vote in [OO 10.1]
SAM 03.1	The engagement section of this indicator is applicable if in the Organisational Overview module, OO 10.1, it was reported for either Listed Equity or Fixed Income: 'We require our external managers to engage...'. • The Listed Equity column of table SAM 03.1 will apply if the above apples to Listed Equity • The Fixed Income (SSA) column of table SAM 03.1 will apply if the above apples to Fixed Income (SSA) (and so on for the other Fixed Income types) The voting section of this indicator is applicable if in the Organisational Overview module, OO 10.1, it was reported that for Listed Equity - voting row: "We require our external managers to vote on our behalf".
SAM 03.2	This indicator is applicable if in the Organisational Overview module, OO 10.1, it was reported for either Listed Equity or Fixed Income: 'We require our external managers to engage...'
SAM 03.3	This indicator is applicable if in the Organisational Overview module, OO 10.1, it was reported that for Listed Equity - voting row: "We require our external managers to vote on our behalf".
ASSESSMENT	
SAM 03	Maximum of twelve ★ per asset class (maximum of nine ★ for Fixed Income)
Scored sub-indicator	SAM 03.1 – Indicate how your organisation typically evaluates the manager's active ownership practices in the majority of the manager selection process for listed equity and/or fixed income.

Indicator scoring methodology		
Selected response	**Level score**	**Further Details**
Engagement		
"None of the above" selected	⭘	
One option selected	★	
Two options selected	★★	
Three options or more selected	★★★	
Proxy voting (not applicable for Fixed income – SSA, Fixed income – corporate (financial), Fixed income – corporate (non-financial) and Fixed income – securitised.)		
"None of the above" selected	⭘	
One option selected	★	
Two options selected	★★	
Three options or more selected	★★★	

Scored sub-indicator	SAM 03.2 – Describe how you assess if the manager's engagement approach is effective

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	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	"None of the above" selected	⭘	
	One option selected	★	
	Two options selected	★★	
	Three options or more selected	★★★	
Scored sub-indicator	SAM 03.3 – Describe how you assess if the manager's voting approach is effective/appropriate		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	"None of the above" selected	⭘	
	One option selected	★	
	Two options selected	★★	
	Three options or more selected	★★★	

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APPOINTMENT

SAM 04	Indicator status	Purpose	Principle
	MANDATORY	CORE ASSESSED/ADDITIONAL ASSESSED	PRI 1

SAM 04	INDICATOR
SAM 04.1	Indicate if in the majority of cases and where the structure of the product allows, your organisation does any of the following as part of the manager appointment and/or commitment process ❑ Sets standard benchmarks or ESG benchmarks ❑ Defines ESG objectives and/or ESG related exclusions/restrictions ❑ Sets incentives and controls linked to the ESG objectives ❑ Requires reporting on ESG objectives ❑ Requires the investment manager to adhere to ESG guidelines, regulations, principles or standards ❑ Other, specify (1)____ ❑ Other, specify (2)____ ❍ None of the above
SAM 04.2	Provide an example per asset class of your benchmarks, objectives, incentives/controls and reporting requirements that would typically be included in your managers' appointment.

Asset class	Benchmark	ESG Objectives	Incentives and controls	Reporting requirements
• All • Applicable from SAM 03	❑ Standard benchmark ❑ ESG benchmark, specify _____	❑ ESG related strategy, specify ___	❑ Fee based incentive	❍ Monthly ❍ Quarterly

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	[drop down]		❑ ESG related investment restrictions, specify ___ ❑ ESG integration, specify ___ ❑ Engagement, specify ___ ❑ Voting, specify ___ ❑ Promoting responsible investment ❑ ESG specific improvements ❑ ESG guidelines/regulation, principles/standards, specify____ ❑ Other, specify _____	❑ Communication and remedy of breaches ❑ Termination ❑ No fee/ breach of contract	❍ Bi-annually ❍ Annually ❍ Ad-hoc/when requested
	[same as above]	[same as above]	[same as above]	[same as above]	[same as above]
	[same as above]	[same as above]	[same as above]	[same as above]	[same as above]
SAM 04.3	Indicate which of these actions your organisation might take if any of the ESG requirements are not met ❑ Discuss requirements not met and set project plan to rectify ❑ Place investment manager on a “watch list” ❑ Track and investigate reason for non-compliance ❑ Re-negotiate fees ❑ Failing all actions, terminate contract with the manager ❑ Other, specify ____ ❍ No actions are taken if any of the ESG requirements are not met				
SAM 04.4	Provide additional information relevant to your organisation's appointment processes of external managers. [OPTIONAL]				

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SAM 04	EXPLANATORY NOTES
SAM 04.1	If none of the options are relevant for you, please re-consider your response to Organisational Overview (OO) 11.2. If you invest in pooled funds, you can describe any other mechanism in place to set expectations as part of the appointment or commitment process in OO 11.5. This may for example be informally setting expectations through conversations and relationship building.
SAM 04.2	Standard benchmark – select this option if your organisation sets benchmarks against mainstream Index products such as the MSCI WORLD, MSCI ACWI, MSCI Emerging Markets, SP500, FTSE100, DAX, EuroStoxx600, Nikkei225, Topix, Iboxx, and Barclays Composite bond index. For absolute return investors that might be Libor + 300Bps, 5%, 8% or any other hurdle rate. A combination of several indexes would still fall within this category. ESG benchmark – select this option if your organisation sets ESG benchmark using indexes with the ESG consideration in its securities selection or weighting. Examples include MSCI range of ESG indexes, FTSE/RUSSEL ESG Index Range, DOW JONES/Robecco SAM sustainable range. ESG objectives are usually part of the Investment Management Agreement (IMA) for separate mandates, the GP/LP Agreement for Private Equity type pools and in Side Letters in all other cases. This allows additional ESG requirements (including ESG related exclusions/restrictions particularly relevant for private equity) to become contractually binding in the relationship between an asset owner and an investment manager. ESG objectives: strategy – this could include objectives to adhere to Codes of Conduct, your organisation's investment strategy, investment policy and/or statement of beliefs and similar strategy / governance documents. An active ownership objective could be to execute engagement/voting activities by following your organisation's engagement/voting policy or specific ESG position. ESG specific improvements – objectives might include that the investment manager puts in place an RI policy, undergoes training on ESG and similar. Incentives and controls: Fee based incentive – select this option if your organisation has a positive incentive (higher fees) or negative incentive (not full amount of standard fees) based on the manager's ESG performance. Termination – select this option if your organisation would be terminating investment manager's contract or if your organisation would not be bound by private equity commitments (become an excused investor in to a pulled vehicle) if ESG objectives are not met. Communication and remedy of breaches – communication that a breach of contract/agreement has occurred and establish actions to remedy the breach No fee/ breach of contract – select this option if your organisation would pay no fees, recover fees already paid or would terminate the contract with the manager if ESG objectives are not met. To find out more on how your peers have responded on this practice, view our analysis and visualisation in the asset owner interactive data report available on the Data Portal and the PRI website. For guidance on appointment in private equity, please see 'Incorporating responsible investment requirements into private equity fund terms'.

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LOGIC	
SAM 04	The asset classes presented in SAM 04.2 will be influenced by which asset classes you reported in OO SAM 01.1 or OO 11.2 [SAM 04] will be applicable if you report 'Appointment' for the relevant external asset class in OO 11.2. [SAM 04.2] is triggered by SAM 04.1 if you select any of the options (excluding "Other, specify" and/or Requires the investment manager to adhere to ESG guidelines, regulations, principles or standards)

ASSESSMENT			
	Indicator scoring methodology Maximum of 12 ★ per asset class		
	Selected response	**Level score**	**Further Details**
	Core Assessed		
	SAM 04.1		
	"None of the above" or "None of the above, we invest only in pooled funds and have a thorough selection process" selected	⭘	
	One option selected	★	
	Two options selected	★★	
	Three or four options selected	★★★	
	SAM 04.2		
	No example provided	⭘	
	Example provided	★★★	
	Additional Assessed		

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	SAM 04.3		
	"None of the above" selected	⭘	
	One option selected	★	
	Two options selected	★★	
	Three or more options selected	★★★	

Examples

Asset class	Benchmark	Objectives	Incentives and controls	Reporting requirements
• Property	☑ Standard benchmark, specify "Liber + 6%"	☑ Integration, specify "Improving energy efficiency by 5% of the buildings"	☑ Fee based incentive	● Annually
• Listed equity	☑ ESG benchmark, specify "MSCI World ESG"	☑ Voting, specify "the asset owner is retaining the rights of all corporate actions and voting issues in accordance to its ESG policies. In lieu of asset owner's instructions the manager is going to vote according to asset owner's voting policy" ☑ Engagement, specify "The asset owner retains the right to engage directly with any of the companies in the investment portfolio and the investment manager will be required to facilitate the interaction."	☑ Termination	● Quarterly

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MONITORING

SAM 05	Indicator status MANDATORY	Purpose CORE ASSESSED / ADDITIONAL ASSESSED	Principle PRI 1

SAM 05	INDICATOR						
SAM 05.1	When monitoring managers, indicate which of the following types of responsible investment information your organisation typically reviews and evaluates..						
		All assets	Asset class 1	Asset class 2	Asset class 3	Asset class 4	Asset class 5
	ESG objectives linked to investment strategy (with examples)	❑	❑	❑	❑	❑	❑
	Evidence on how the ESG incorporation strategy(ies) affected the investment decisions and financial / ESG performance of the portfolio/fund	❑	❑	❑	❑	❑	❑
	Compliance with investment restrictions and any controversial investment decisions	❑	❑	❑	❑	❑	❑
	ESG portfolio characteristics	❑	❑	❑	❑	❑	❑
	How ESG materiality has been evaluated by the manager in the monitored period	❑	❑	❑	❑	❑	❑
	Information on any ESG incidents	❑	❑	❑	❑	❑	❑
	Metrics on the real economy influence of the investments	❑	❑	❑	❑	❑	❑
	PRI Transparency Reports	❑	❑	❑	❑	❑	❑
	PRI Assessment Reports	❑	❑	❑	❑	❑	❑
	RI-promotion and engagement with the industry to enhance RI implementation	❑	❑	❑	❑	❑	❑
	Changes to the oversight and	❑	❑	❑	❑	❑	❑

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	responsibilities of ESG implementation						
	Other general RI considerations in investment management agreements; specify_____	❑	❑	❑	❑	❑	❑
	None of the above	❑	❑	n/a	n/a	n/a	n/a
SAM 05.2	When monitoring external managers, does your organisation set any of the following to measure compliance/progress:						
	ESG score or assessment	❑	❑	❑	❑	❑	❑
	ESG weight	❑	❑	❑	❑	❑	❑
	ESG performance minimum threshold	❑	❑	❑	❑	❑	❑
	Real economy targets	❑	❑	❑	❑	❑	❑
	Other RI considerations ____	❑	❑	❑	❑	❑	❑
	None of the above	❑	❑	❑	❑	❑	❑
SAM 05.3	Provide additional information relevant to your organisation's monitoring processes of external managers. [OPTIONAL]						

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SAM 05	EXPLANATORY NOTES
SAM 05	**The indicator [SAM 5.2] is aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations.** ESG score and weight does not have to be quantitative; this could also be assurance requirements or complying with minimum standards. ESG weight could for example capture the ESG performance minimum threshold or standards, and trigger points for action when monitoring your manager. You may wish to comment on variations in the reporting provided by your managers and on the reasons for these variations (e.g. does it reflect their contractual obligations? Is it a function of asset class or the types of investment being made?). ESG objectives linked to investment strategy - objectives set to adhere to Codes of Conduct, your organisation's investment strategy, investment policy and/or statement of beliefs and similar strategy / governance documents. Investment restrictions and any controversial investment decisions – this could mean checking if investment manager has invested or disinvested with a non-consensus view. ESG portfolio characteristics – this would include reviewing what companies are in the portfolio, what are their respective ESG scores and how has the ESG composition of the portfolio changed from the last reporting period. This could also include reviewing examples of turnover for the monitored time period. Information on any ESG incidents – this could also include any examples of previously bought stock being sold due to ESG factors. Metrics on the real economy influence of the investments – this could for example be the energy efficiency of the portfolio of buildings. If you require your external managers to undertake carbon portfolio monitoring, you are strongly encouraged to report this using the 'additional information' field. To find out more on how your peers have responded on this practice, view our analysis and visualisation in the asset owner interactive data report available on the Data Portal and the PRI website. To find out more about how LPs can monitor their GPs and the ESG characteristics of their private equity investments, see the 'ESG monitoring, reporting and dialogue in private equity' PRI guidance document.
SAM 05.3	You are encouraged to describe any varieties in your monitoring methods here. LPs can use this space to report on key monitoring practices and their frequency, such as exception-based reporting, using the LPAC and the Annual Investor Meeting (AIM), using monitoring templates, assessing and scoring GPs, using the PRI Reporting Framework, monitoring ESG incidents, and reviewing GPs' internal ESG/CSR management and initiatives. Read more about these monitoring methods in the 'ESG monitoring, reporting and dialogue in private equity' PRI guidance document.
LOGIC	
SAM 05	[SAM 05] will be applicable if you report 'Monitoring' for the relevant external asset class in OO 11.2.
ASSESSMENT	
SAM 05	**Indicator scoring methodology**

	Selected response	Level score	Further Details
	Core Assessed		
	SAM 05.1		

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	"None of the above" selected	⭘	
	One or two options selected	★	If both "PRI Transparency Reports" and "PRI Assessment Reports" are selected, they are eligible to be counted as one option together.
	Three or four options selected	★★	
	Five or more options selected	★★★	
	Additional Assessed		
	SAM 05.2		
	"None of the above" selected	⭘	
	One option selected	★	
	Two options selected	★★	
	Three options selected	★★★	

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SAM 06	Indicator status MANDATORY	Purpose ADDITIONAL ASSESSED	Principle PRI 1

SAM 06	INDICATOR						
SAM 06.1	When monitoring managers, indicate which of the following active ownership information your organisation typically reviews and evaluates from the investment manager in meetings/calls						
		All assets	Asset class 1	Asset class 2	Asset class 3	Asset class 4	Asset class 5
	Engagement						
	Report on engagements undertaken (summary with metrics, themes, issues, sectors or similar)	❑	❑	❑	❑	❑	❑
	Report on engagement ESG impacts (outcomes, progress made against objectives and examples)	❑	❑	❑	❑	❑	❑
	Information on any escalation strategy taken after initial unsuccessful dialogue	❑	❑	❑	❑	❑	❑
	Alignment with any eventual engagement programme done internally	❑	❑	❑	❑	❑	❑
	Information on the engagement activities' impact on investment decisions	❑	❑	❑	❑	❑	❑
	Other RI considerations relating to engagement in investment management agreements; specify_____	❑	❑	❑	❑	❑	❑
	None of the above	❑	❑	❑	❑	❑	❑

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	(Proxy) voting					
Report on voting undertaken (with outcomes and examples)	❑	❑	n/a	n/a	n/a	n/a
Report on rationale of voting decisions taken	❑	❑	n/a	n/a	n/a	n/a
Adherence with the agreed upon voting policy	❑	❑	n/a	n/a	n/a	n/a
Other RI considerations relating to (proxy) voting in investment management agreements; specify_____	❑	❑	n/a	n/a	n/a	n/a
None of the above	❑	❑	n/a	n/a	n/a	n/a

SAM 06	**EXPLANATORY NOTES**
	This indicator aims to capture how your organisation monitors your managers' active ownership practices and processes to measure their influence. For listed equity this can mean reviewing the manager's engagement process discussing in what situations the manager engages, requesting examples and outcomes, reviewing how the engagement outcomes feed back into the investment decision-making process. Monitoring of engagement activities might entail discussing with your investment managers their escalation strategies in case of initial unsuccessful dialogue (i.e. filing a resolution, informing voting against management, issuing a public statement, considering reducing investment/divesting or litigation). When reviewing proxy voting activities undertaken by investment managers, your organization might want to monitor that voting decisions have been made in accordance with your agreed upon voting policy and assess any situation where there has been lack of adherence. If your organisation undertakes some engagement activities in house (as reporting in the LEA module), your monitoring process could include ensuring alignment of your manager's objectives and results of engagement practices with your internal engagement activities.
LOGIC	
SAM 06	[SAM 06] is applicable if you report requiring external managers to engage or vote in [OO 10.1]

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SAM 06.1	The engagement section of this indicator is applicable if in the Organisational Overview module, OO 10.1, it was reported for either Listed Equity or Fixed Income: 'We require our external managers to engage...'. • The Listed Equity column of table SAM 03.1 will apply if the above apples to Listed Equity • The Fixed Income (SSA) column of table SAM 03.1 will apply if the above apples to Fixed Income (SSA) (and so on for the other Fixed Income types) The voting section of this indicator is applicable if in the Organisational Overview module, OO 10.1, it was reported that for Listed Equity - voting row: "We require our external managers to vote on our behalf". "Report on voting undertaken (with outcomes and examples)" will trigger SAM 07.1

ASSESSMENT

SAM 06	Maximum of six ★ per asset class		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	Engagement		
	"None of the above" selected	⭘	
	One option selected	★	
	Two options selected	★★	
	Three options selected	★★★	
	Proxy voting (not applicable for Fixed income – SSA, Fixed income – corporate (financial), Fixed income – corporate (non-financial) and Fixed income – securitised.)		
	"None of the above" selected	⭘	
	One option selected	★	
	Two options selected	★★	
	Three options selected	★★★	

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SAM 07	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 2

SAM 07	INDICATOR	
SAM 07.1	For the listed equities for which you have given your external managers a (proxy) voting mandate, indicate the approximate percentage (+/- 5%) of votes that were cast during the reporting year.	
	Votes cast (to the nearest 5%)	**Specify the basis on which this percentage is calculated.**
	_____ %	❍ Of the total number of ballot items on which they could have issued instructions ❍ Of the total number of company meetings at which they could have voted ❍ Of the total value of your listed equity holdings on which they could have voted
	❑ We do not collect this information.	

SAM 07.2	Indicator status	Purpose	Principle
	VOLUNTARY	DESCRIPTIVE	PRI 2
	For the listed equities for which you have given your external managers a mandate to engage on your behalf, indicate the approximate percentage (+/- 5%) of companies that were engaged with during the reporting year.		
	Number of companies engaged	_____	
	Proportion (to the nearest 5%)	_____ %	

SAM 07.3	Additional information [OPTIONAL]

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SAM 07	EXPLANATORY NOTES
SAM 07	When calculating the percentage of votes cast or companies engaged with, please include only those holdings for which you have given external managers the mandate to vote or engage.
SAM 07.3	*Variations in reporting* You may wish to comment on variations in the reporting provided by your investment managers and on the reasons for these variations. *Reasons why managers choose not to vote* You may wish to comment on a variety of reasons why managers choose not to vote, including: • strategic decision not to vote on certain types of assets or funds; • operational or timing constraints; • share-blocking; • conflicts of interest; • administrative impediments (e.g. power of attorney requirements); • voting fees; • geographical restrictions (non-home market); • insufficient information; and/or • overall cost effectiveness.
LOGIC	
SAM 07	[SAM 07] is applicable if you selected "Report on voting undertaken" or "Report on engagements undertaken" in [SAM 06] [SAM 07.1] is triggered if, in [SAM 06.1] you selected "Report on voting undertaken (with outcomes and examples)" [SAM 07.2] is triggered if, in [SAM 06.1] you selected 'Report on engagements undertaken (summary with metrics, themes, issues, sectors or similar)'
ASSESSMENT	
SAM 07.1	Maximum score: Three ★ per asset class

Indicator scoring methodology		
Selected response	**Level score**	**Further Details**
"We do not collect this information" selected or "<10%" reported	○	
>10 to 80% reported	★	
>80 to 95% reported	★★	
>95% reported	★★★	

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SECTION

Outputs and outcomes

SAM 08	Indicator status MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	Purpose DESCRIPTIVE	Principle PRI 1

SAM 08	INDICATOR	
SAM 08.1	Describe how you ensure that best RI practice is applied to managing your assets	
		Measures
	❑ Encourage improved RI practices with existing investment managers	[free text]
	❑ Move assets over to investment managers with better RI practices	[free text]
	❑ Other, specify _____	[free text]
	❑ None of the above	
SAM 08.2	Additional information [OPTIONAL]	

SAM 08	EXPLANATORY NOTES
SAM 08	To find out more on how your peers have responded on this practice, view our analysis and visualisation in the asset owner interactive data report available on the Data Portal and the PRI website.

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SAM 09	Indicator status MANDATORY	Purpose ADDITIONAL ASSESSED	Principle PRI 1,6

SAM 09	INDICATOR				
SAM 09.1	Provide examples of how ESG factors have been addressed in the manager selection, appointment and/or monitoring process for your organisation during the reporting year.				
	Topic or issue	Conducted by	Asset class	Scope and process	Outcomes
		• Internal staff • Investment consultants [drop down]	• All • Applicable from SAM 03 [drop down]		
		[same as above]	[same as above]		
		[same as above]	[same as above]		
		[same as above]	[same as above]		
		[same as above]	[same as above]		
	❑ We are not able to provide examples				
SAM 09.2	Additional information. [OPTIONAL]				

SAM 09	EXPLANATORY NOTES		
SAM 09.1	Organisations are not expected to provide the names/details of investment managers. Ideally, you should provide examples from the current reporting year but you are encouraged to report examples from previous years if you want to provide a balanced view on how ESG factors influence selection, appointment and/or monitoring processes or to highlight specific features of your approach.		
LOGIC			
SAM 09.1	The asset classes in SAM 09.1 will be influenced by which asset classes you reported in OO SAM 01.1 and OO 11.2		
ASSESSMENT			
SAM 09.1	**Indicator scoring methodology**		
	Selected response	**Level score**	**Further Details**
	No example provided	⭘	
	Example provided	★★★	

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EXAMPLES				
Topic or issue	**Conducted by**	**Asset class**	**Scope and process**	**Outcomes**
Mining	Internal staff	Private Equity	In selecting a specialist PE mining investor, during due diligence, we noted that the GP's ESG process did not address health and safety. We asked the GP to develop a policy and criteria on this issue. The GP refused to do so.	We therefore decided not to invest in the fund.
Human rights	Internal staff	Property	The manager of the fund did not have a policy to address the rights of communities relocated for property development. We requested the manager to develop a policy on this issue.	The manager developed a policy and we were able to invest in the fund.

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PRI REPORTING FRAMEWORK 2019
Direct — Listed Equity Incorporation

November 2018

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UNEP Finance Initiative
Changing finance, financing change

United Nations Global Compact

An investor initiative in partnership with UNEP Finance Initiative and UN Global Compact

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), the purpose of the indicator and which PRI Principle it relates to.

	Indicator status	Purpose	Principle
xxx 01	*MANDATORY*	*CORE ASSESSED*	*PRI 2*

Indicator status

MANDATORY	Mandatory indicators reflect core practices. These responses will be made public and must be completed to submit the framework.
MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	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.
VOLUNTARY	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.
Peering	These indicators are used to determine your peer groups for assessment purposes.
Core assessed	These indicators form the core of the assessment and represent the majority of your final assessment score.
Additional assessed	These indicators represent more advanced or alternative practices and contribute to a smaller part of your score.
Descriptive	These are open-ended narrative indicators, allowing you to describe your activities.

Underneath the indicator

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

xxx 01	*EXPLANATORY NOTES*
xxx 01.1	This provides guidance on how to interpret the sub-indicators, including examples of what could be reported.
xxx 01.2	
LOGIC	
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.
ASSESSMENT	
xxx 01	This provides a brief overview of the pilot assessment approach for this indicator.

xxx 01	*DEFINITIONS*
xxx 01	Specific terms used in the indicator are defined here.

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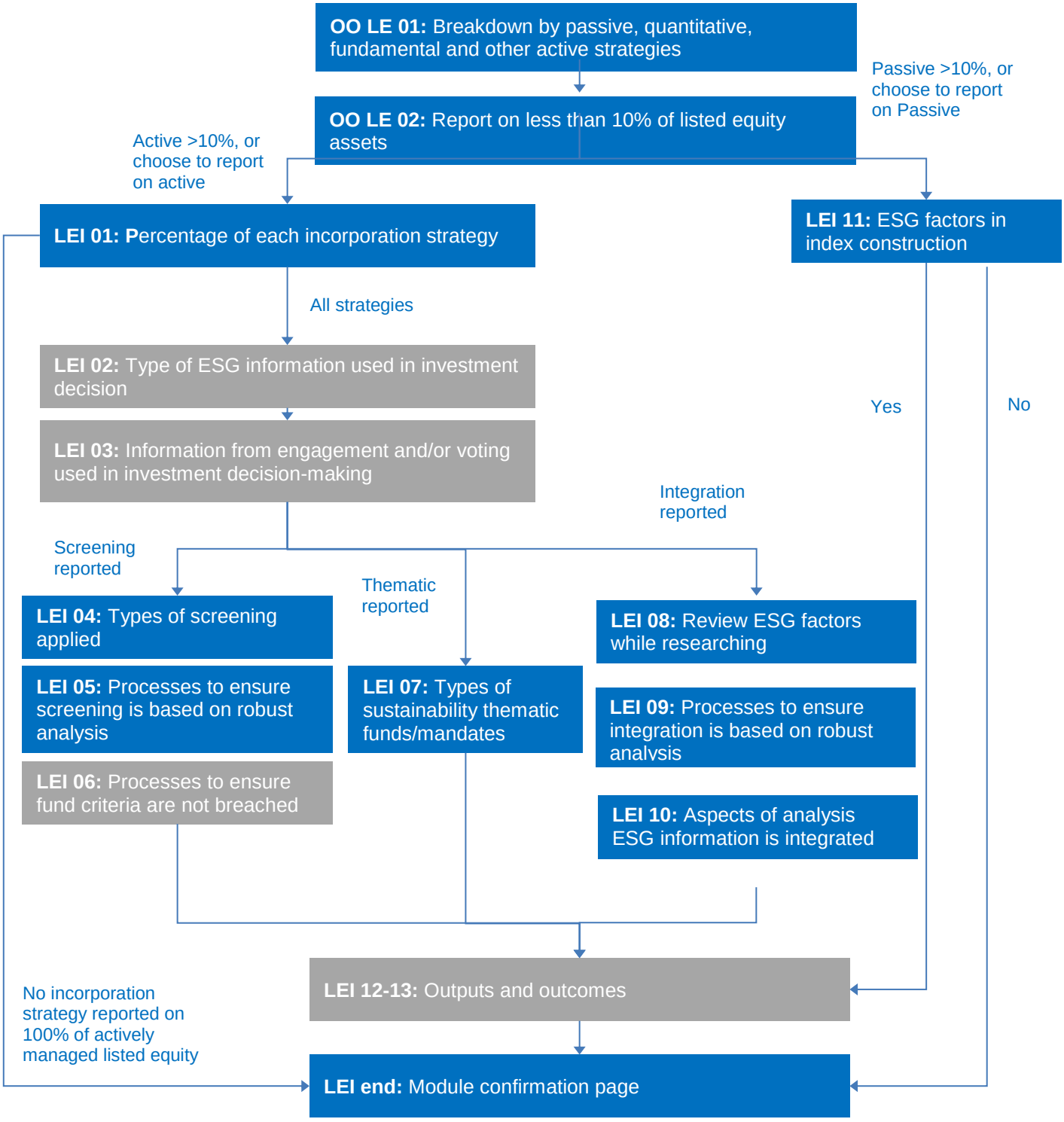
Pathways through the module



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Preface

The information reported in this module will enable your stakeholders to understand how your organisation incorporates ESG factors into your internally managed listed equity holdings.

This module has distinct sections for active and passive investors which will be triggered by your response in [OO LE 01].

Summary of updates

2018 Indicator	Update summary
LEI 02	Sub-indicators have been removed or renumbered.
LEI 04	A sub-indicator has been reworded.
LEI 05	New option has been added to a sub-indicator.
LEI 09	New option has been added to a sub-indicator.
LEI 10	Sub-indicators have been added, new options have been added and have been reworded.
LEI 12	New option has been added to a sub-indicator.
LEI 14	Indicator has been renumbered to LEI 13.

To view a detailed summary of changes to the module, please click here.

For any word limit in the module, please click here.

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SECTION

ESG incorporation in actively managed listed equities

IMPLEMENTATION PROCESS

LEI 01	Indicator status	Purpose	Principle
	MANDATORY	GATEWAY	PRI 1

LEI 01	INDICATOR
LEI 01.1	Indicate • which ESG incorporation strategy and/or combination of strategies you apply to your actively managed listed equities; and • the breakdown of your actively managed listed equities by strategy or combination of strategies.

ESG incorporation strategy (select all that apply)	**Percentage of active listed equity to which the strategy is applied — you may estimate +/- 5%**
❑ Screening alone (i.e. not combined with any other strategies)	____ %
❑ Thematic alone (i.e., not combined with any other strategies)	____ %
❑ Integration alone (i.e., not combined with any other strategies)	____ %
❑ Screening and integration strategies	____ %
❑ Thematic and integration strategies	____ %
❑ Screening and thematic strategies	____ %
❑ All three strategies combined	____ %
❑ We do not apply incorporation strategies	____ %
Total actively managed listed equities	**100%**

LEI 01.2	Describe your organisation's approach to ESG incorporation and the reasons for choosing the particular strategy/strategies. [1000 words]
LEI 01.3	If assets are managed using a combination of ESG incorporation strategies, briefly describe how these combinations are used. [OPTIONAL] [1000 words]

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LEI 01	EXPLANATORY NOTES
LEI 01	**The indicator [LEI 01.1] is aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations.** To find out more on how your peers have responded on this practice, view our analysis and visualisation in the listed equity incorporation interactive data report available on the Data Portal and the PRI website.
LEI 01.1	Under Principle 1, signatories must incorporate ESG factors into investment analysis and decision-making processes. See the definitions below for details about the three strategies described here. The purpose of this indicator is to allow you to demonstrate the proportions of your listed equity assets covered by different approaches in implementing this principle. There are many different ways this can be done. The options provided are designed to allow you to reflect your particular approach as faithfully as possible. This indicator will also determine whether you see more detailed indicators on the individual strategies. Please select the strategy that most closely matches your approach. If you apply two strategies to the same assets, please select the relevant combination options. For example, you may apply screening for only 5% of your assets, and for the remainder a combination of screening and integration. In these cases, you would report 'Screening alone' for 5% and 'Screening and Integration strategies' for the remaining 95%. If you do not apply any incorporation approach, and the option 'We do not apply incorporation strategies' accounts for 100% of your listed equity assets, you will not need to report further in the actively managed listed equity section of this module.
LEI 01.2	The indicator allows you to provide a broad overview of how your organisation takes into account ESG factors in listed equity investment. Please describe the activities, strategies and processes used. Subsequent indicators ask for specific information on the coverage of these strategies and allow you to provide specific information on how these are implemented. This indicator may include a discussion of: • the main ESG strategies that you use, and the motivation for their use; • who is responsible for the implementation of these strategies; and/or • how your ESG incorporation strategies differ (e.g., by geography, sector, etc.). • how combinations of strategies are used (if applicable)
LOGIC	
LEI 01	[LEI 01] is triggered if you report in the Organisational Overview module in [OO LE 01.1] that you have "Active - quantitative" or "Active - fundamental" strategies. ▪ If this OO LE 01.1 figure is under 10%, you must select "Yes" under "Report on strategy" in OO LE 02.1 [LEI 11 – 13] are triggered if your report in Organisational Overview module in [OO LE 01.1] that you have "Passive" strategies. If screening, thematic and/or integration strategies are reported, LEI 02 – 03 and LEI 12 - 13 will be applicable and a range of indicators, LEI 04 to LEI 10 will be applicable. Based on the strategy options reported the following logic will then apply: ▪ 'Screening alone' selected: triggers the 'Implementation: Screening' section [LEI 04 - LEI 06]. ▪ 'Thematic alone': triggers the 'Implementation: Sustainability themed investing' section [LEI 07]. ▪ 'Integration alone': triggers the 'Implementation: Integration of ESG factors' section [LEI 08-10]. ▪ 'Screening plus Integration': triggers 'Implementation Screening' section [LEI 04 - LEI 06] and 'Implementation: Integration of ESG factors' section [LEI 08 - LEI 10]. ▪ 'Thematic plus Integration': triggers the Implementation: Sustainability themed investing' section' [LEI 07] and 'Implementation: Integration of ESG factors' section [LEI 08 - LEI 10]. ▪ 'Screening plus Thematic': triggers the 'Implementation Screening' section [LEI 04 - LEI 06] and the 'Implementation: Sustainability themed investing' section' [LEI 07]. ▪ 'All three strategies': triggers all three sections [LEI 04 - LEI 10].

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	• If 'No incorporation strategies applied' to 100% of your actively managed listed equities, indicators [LEI 02 - LEI 13] will not be applicable. [LEI 01.2] will not be applicable if "We do not apply incorporation strategies" is 100% in [LEI 01.1]
ASSESSMENT	
LEI 01	This indicator is not directly assessed, but your response in [LEI 01.1] will contribute to how your aggregated LEI score is calculated. Your aggregated LEI score will be based on your 'primary' incorporation strategy. This will be based on the percentage of assets each incorporation strategy is applied to in [01]. You can achieve the top level with any of the three strategies (screening, thematic or integration) or any combination. You will also receive a separate score for each incorporation strategy you employ in your assessment report. All relevant assessed indicators will be included in your module scorecard.

LEI 01	**DEFINITIONS**
Incorporation of ESG factors into investment analysis and decision-making processes is covered in Principle 1 of the PRI. Throughout the Reporting Framework, we refer to ESG incorporation as the review and use of ESG information in the investment decision-making process. The Reporting Framework addresses four ways in which ESG incorporation can be done: 1. screening; 2. sustainability themed investment (also referred to as environmentally and socially themed investment); 3. integration; and/or 4. a combination of the above. Assets subject to an engagement approach only and not subject to any of the above strategies should not be included in ESG incorporation. To improve standardisation and communication in the responsible investment industry, the PRI has aligned its definitions with those of the Global Sustainable Investment Alliance. These are presented below for convenience.	
Screening of investments	The definitions of the three types of screening in the Reporting Framework are: a. negative/exclusionary screening: The exclusion from a fund or portfolio of certain sectors, companies or practices based on specific ESG criteria; b. positive/best-in-class screening: Investment in sectors, companies or projects selected for positive ESG performance relative to industry peers; c. norms-based screening: Screening of investments against minimum standards of business practice based on international norms. Norms-based screening involves either: 1. defining the investment universe based on investees' performance on international norms related to responsible investment/ESG factors; or 2. excluding investees from portfolios after investment if they are found following research, and sometimes engagement, to contravene these norms. Such norms include but are not limited to the UN Global Compact Principles, the Universal Declaration of Human Rights, International Labour Organization standards, the United Nations Convention Against Corruption and the OECD Guidelines for Multinational Enterprises.
Sustainability **themed** investment	Investment in themes or assets specifically related to sustainability (for example, clean energy, green technology or sustainable agriculture).
Integration of ESG factors	The systematic and explicit inclusion by investment managers of environmental, social and governance factors into traditional financial analysis. For guidance and case studies on ESG integration refer to the PRI's Practical Guide to ESG Integration for Equity Investing and the Guidance and Case Studies for ESG Integration: Equities and Fixed Income.
For further detail on these definitions, please see separate Main Definitions document.	

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LEI 02	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PRI 1

LEI 02	INDICATOR	
LEI 02.1	Indicate what ESG information you use in your ESG incorporation strategies and who provides this information.	
	Type of ESG information	**Indicate who provides this information**
	❑ Raw ESG company data	❑ ESG research provider ❑ Sell-side ❑ In-house—specialised ESG analyst or team ❑ In-house—analyst or portfolio manager
	❑ Company-related analysis or ratings	❑ ESG research provider ❑ Sell-side ❑ In-house—specialised ESG analyst or team ❑ In-house—analyst or portfolio manager
	❑ Sector-related analysis or ratings	❑ ESG research provider ❑ Sell-side ❑ In-house—specialised ESG analyst or team ❑ In-house—analyst or portfolio manager
	❑ Country-related analysis or ratings	❑ ESG research provider ❑ Sell-side ❑ In-house—specialised ESG analyst or team ❑ In-house—analyst or portfolio manager
	❑ Screened stock list	❑ ESG research provider ❑ Sell-side ❑ In-house—specialised ESG analyst or team ❑ In-house—analyst or portfolio manager
	❑ ESG issue-specific analysis or ratings	❑ ESG research provider ❑ Sell-side ❑ In-house—specialised ESG analyst or team ❑ In-house—analyst or portfolio manager
	❑ Other; specify_____	❑ ESG research provider ❑ Sell-side ❑ In-house—specialised ESG analyst or team ❑ In-house—analyst or portfolio manager
LEI 02.2	Indicate whether you incentivise brokers to provide ESG research.	
	❍ Yes	❍ No
	Describe how you incentivise brokers.	

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LEI 02.3	[200 words]
LEI 02.4	Additional information [OPTIONAL]

LEI 02	**EXPLANATORY NOTES**
LEI 02.1	The purpose of this indicator is to allow you to report what type of ESG information contributes to your investment decisions. It also allows you to highlight the sources of this information. For example, some investors may use ESG data obtained from specialist research providers directly. Others may conduct their own in-house research to supplement research purchased from third parties and use this amended research in their investment process. Others may be doing both. (Note that you will be able to describe the quality of this research and how it is used in your investment process in later indicators of this module.) Different possible sources: • **raw ESG company data**: data on companies' ESG performance as provided by the companies prior to any analysis or aggregation; • **company-related ESG analysis or ratings**: analysis or aggregation of information on company ESG performance, risks or opportunities. These may be represented as a rating percentage or another metric, for example, letters; • **sector-related ESG analysis or ratings**: analysis or aggregation of ESG performance, risks or opportunities related to a particular industry sectors such as the food and beverage sector; • **country-related ESG analysis or ratings:** analysis or aggregation of ESG laws, policies, norms, performance, risks and/or opportunities related to individual countries; • **screened stock list**: a list of stocks that composes the acceptable universe from which to construct a screened portfolio; and/or • **issue-specific ESG analysis or ratings:** may be analysis of a single issue (e.g., human rights) or a trend or theme such as climate change.
LEI 02.2	The application of an incentive system with third-party providers (such as brokers) is viewed as an influential way to promote ESG factors. The financial quantification of ESG services and their quality encourages attention to ESG factors and enables more dedicated resources.
LEI 02.3	In this indicator, you might also wish to describe the actions you take to stimulate ESG research. For example, you could describe if: you identify ESG factors and suggest brokers or other investment research providers look into them; your broker evaluation processes (which determines how you allocate commissions to brokers) include an ESG component; and/or you have a budget for purchasing broker research on ESG factors.

LOGIC	
LEI 02	[LEI 02.3] will be applicable if you report 'Yes' in [LEI 02.2].
ASSESSMENT	
LEI 02	Maximum score: Three ★

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	The assessment of this indicator is based on responses to [02.1].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	None	⭘	
	One type of ESG information	★	
	Two types of ESG information OR One type of information and brokers are incentivised on ESG related research	★★	
	Three or more types of ESG information OR Two types of information and brokers are incentivised on ESG research	★★★	

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LEI 03	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PRI 1

LEI 03	INDICATOR	
LEI 03.1	Indicate whether your organisation has a process through which information derived from ESG engagement and/or (proxy) voting activities is made available for use in investment decision-making.	
	Engagement	❍ We have a systematic process to ensure the information is made available. ❍ We occasionally make this information available. ❍ We do not make this information available.
	(Proxy) voting	❍ We have a systematic process to ensure the information is made available. ❍ We occasionally make this information available. ❍ We do not make this information available.
LEI 03.2	Additional information	

LEI 03	EXPLANATORY NOTES
LEI 03	**Th indicator [LEI 03.1] is aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations.**
LEI 03.1	This indicator allows you to explain whether you have a formal process through which information derived from ESG engagement and/or voting activities is used in investment decision-making and whether information derived from engagement is shared with your internal or external investment managers (i.e., to link PRI Principle 2 and Principle 1). Select 'We have a **systematic** process to ensure the information is made available' if you have a formal system or process to make engagement and voting information available to investment decision-makers for all relevant funds. In most cases, this will apply to fundamental stock-picking funds. The implication is not, however, that all engagement and voting activities will always influence investment decision-making. Select 'We **occasionally** make this information available' if the information derived from engagement and voting activities is used sometimes and/or in varying ways by different individuals or funds, i.e., there is no systematic process for all funds. Engagement refers to interactions that you may have with investees for influence in relation to ESG factors. Voting activities refer to the full range of activities around (proxy) voting, including company research, the views of other investors, voting decisions and the company's responses and actions.
LOGIC	
LEI 03	The "Engagement" section in [LEI 03.1] is triggered in OO 10.1 "Listed equity - engagement" row, if you select 'We engage with companies on ESG factors via our staff, collaborations or service providers'. The "(Proxy) voting" section in [LEI 03.1] is triggered in OO 10.1 "Listed equity - voting" row, if you select 'We cast our (proxy) votes directly or via dedicated voting providers'.

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ASSESSMENT			
LEI 03	Maximum score: Three ★ The assessment of this indicator looks at the information derived from both engagements and (proxy) voting being made available for investment decision-making.		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	'No' in both engagement and voting	⭘	
	Either engagement or voting information used occasionally	★	
	Both engagement and voting information used occasionally	★★	
	Either engagement or voting information made available systematically	★★★	

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LEI 04	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle PRI 1

LEI 04	INDICATOR		
LEI 04.1	Indicate and describe the type of screening you apply to your internally managed active listed equities.		
	Type of screening	**Screened by**	**Description**
	Negative/exclusionary screening	❒ Product ❒ Activity ❒ Sector ❒ Country/geographic region ❒ Environmental and social practices and performance ❒ Corporate governance	[Free text; 500 words]
	Positive/best-in-class screening	❒ Product ❒ Activity ❒ Sector ❒ Country/geographic region ❒ Environmental and social practices and performance ❒ Corporate governance	[Free text; 500 words]
	Norms-based screening	❒ UN Global Compact Principles ❒ The UN Guiding Principles on Business and Human Rights ❒ International Labour Organization Conventions ❒ United Nations Convention Against Corruption ❒ OECD Guidelines for Multinational Enterprises ❒ Other; specify_____	[Free text; 500 words]
LEI 04.2	Describe how you notify clients and/or beneficiaries when changes are made to your screening criteria.		
	[500 words]		

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LEI 04	EXPLANATORY NOTES
LEI 04	**The indicator [LEI 04.1] is aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations.**
LEI 04.1	Description boxes: Describe which ESG screens are used, for which funds (i.e., one screen applied to all funds and/or multiple screens applied to different funds) and whether they are used in combination with other screens. Screening can be based on: • products—e.g., specified weapons, tobacco; • activities—e.g., specific products within a sector that is not in itself excluded such as uranium mining; • sectors—e.g., oil and gas, mining; • countries/geographic regions—e.g., Sudan, Iran; • environmental and social practices and performance—e.g., child labour, environmental damage, sustainability reporting; or • corporate governance—e.g., excessive executive remuneration, non-independent boards.
LEI 04.2	Your description may include how you notify your clients/beneficiaries, whether notification occurs pre or post changes and a description of the time frame.

LEI 04	DEFINITIONS
For the definition of this strategy, please see the Main Definitions document.	

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LEI 05	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 1

LEI 05	INDICATOR
LEI 05.1	Indicate which processes your organisation uses to ensure ESG screening is based on robust analysis. ❒ Comprehensive ESG research is undertaken or sourced to determine companies' activities and products. ❒ Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies. ❒ External research and data used to identify companies to be excluded/included is subject to internal audit by ESG/RI staff, the internal audit function or similar. ❒ Third-party ESG ratings are updated regularly to ensure that portfolio holdings comply with fund policies. ❒ Trading platforms blocking / restricting flagged securities on the black list ❒ A committee, body or similar with representatives independent of the individuals who conduct company research reviews some or all screening decisions. ❒ A periodic review of internal research is carried out. ❒ Review and evaluation of external research providers. ❒ Other; specify_____ ❒ None of the above
LEI 05.2	Indicate the proportion of your actively managed listed equity portfolio that is subject to comprehensive ESG research as part your ESG screening strategy. ❍<10% ❍ 10-50% ❍ 51-90% ❍>90%
LEI 05.3	Indicate how frequently third party ESG ratings are updated for screening purposes. ❒ Quarterly or more frequently ❒ Bi-Annually ❒ Annually ❒ Less frequently than annually
LEI 05.4	Indicate how frequently you review internal research that builds your ESG screens. ❒ Quarterly or more frequently ❒ Bi-Annually ❒ Annually ❒ Less frequently than annually
LEI 05.5	Additional information [OPTIONAL] [1000 words]

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LEI 05	EXPLANATORY NOTES
LEI 05	**The indicator [LEI 05.1] is aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations.** To find out more on how your peers have responded on this practice, view our analysis and visualisation in the **listed equity incorporation interactive data report** available on the Data Portal and the PRI website
LEI 05.1	'Trading platforms blocking / restricting flagged securities on the black list' refers to trading platform software that either blocks or restricts placing trades or monitoring accounts to ensure buy decisions do not breach internal policies, internal blacklists, etc..
LOGIC	
LEI 05	[LEI 05.2] will be applicable if you report 'Comprehensive ESG research is undertaken or sourced to determine companies' activities and products' in [LEI 05.1]. [LEI 05.3] will be applicable if you report 'Third-party ESG ratings are updated regularly to ensure that portfolio holdings comply with fund policies' in [LEI 05.1]. [LEI 05.4] will be applicable if you report 'A periodic review of internal research is carried out' activities and products' in [LEI 05.1].
ASSESSMENT	
LEI 05.1	Maximum score: Three ★ The assessment of this indicator is based on your responses to [05.1].

Indicator scoring methodology		
Selected response	**Level score**	**Further Details**
'None of the above'	⭘	
One selection	★	
Two selections	★★	
Three or more selections	★★★	

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LEI 06	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PRI 1

LEI 06	INDICATOR
LEI 06.1	Indicate which processes your organisation uses to ensure fund criteria are not breached. ❒ Systematic checks are performed to ensure that stocks meet the fund's screening criteria ❒ Automated IT systems prevent investment managers from investing in excluded stocks or those that do not meet positive screening criteria. ❒ Audits of fund holdings are undertaken regularly by internal audit function. ❒ Periodic auditing/checking of the organisations RI funds by external party ❒ Other; specify_____ ❒ None of the above.
LEI 06.2	If breaches of fund screening criteria are identified, describe the process followed to correct those breaches. [1000 words]
LEI 06.3	Additional information [OPTIONAL]

LEI 06	EXPLANATORY NOTES
LEI 06.2	Breaches of fund screening criteria refer to occasions when stocks that should have been excluded are bought. *Systematic* Systematic processes are a planned, routine part of your processes. This may include sampling or spot-checking that is conducted according to a pre-set plan.
ASSESSMENT	
LEI 06	Maximum score: Three ★ The assessment of this indicator is based on your responses to [06.1].

Indicator scoring methodology

Selected response	Level score	Further Details
'None of the above'	⭘	
One selection	★	
Two selections	★★	
Three or more selections	★★★	

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LEI 07	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle PRI 1

LEI 07	INDICATOR
LEI 07.1	Indicate the type of sustainability thematic funds or mandates your organisation manages. ❒ Environmentally themed funds ❒ Socially themed funds ❒ Combination of themes
LEI 07.2	Describe your organisation's processes relating to sustainability themed funds. [OPTIONAL] [1000 words]

LEI 07	EXPLANATORY NOTES
LEI 07	Thematic investing is one of the three approaches to ESG incorporation and demonstrates the implementation of PRI Principle 1 in listed equity covered by this Reporting Framework. A voluntary indicator on thematic investing across asset classes is included in the Strategy and Governance (SG) module. There will therefore be some overlap between this indicator and voluntary indicator SG 13. However, please focus here on reporting on your listed equity themes and provide additional information only if not covered in SG. If integrated ESG analysis is used to select stocks or other investments (i.e., taking into account the ESG and financial performance of individual companies) or ESG screens are used to exclude stocks, this will be captured in other sections of this module and should not be reported here.
LEI 07.1	This indicator aims to capture the predominant theme of the fund, e.g., a climate change fund (environmental) or health-care fund (social). If a fund is based on a combination of sustainability factors and trends with no single dominant theme, select 'combination of themes'.
LEI 07.2	In this indicator, you should describe your organisation's process. This may include discussions of: • how these themes are defined; • whether the application/interpretation of the themes differs by sector or by geographic region; and/or • the other factors you consider in your investment process and how the thematic elements relate to the overall process (e.g., are there minimum requirements that all stocks must meet to be considered for investment?).

LEI 07	DEFINITIONS
For definition of this strategy, please see separate Main Definitions document.	

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PRI Principles for Responsible Investment

LEI 08	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 1

LEI 08	INDICATOR	
LEI 08.1	Indicate the ESG factors you systematically research as part of your investment analysis and the proportion of actively managed listed equity portfolios that is impacted by this analysis.	
	ESG factors	**Proportion impacted by analysis**
	❍ Environmental	❍<10% ❍ 10-50% ❍ 51-90% ❍>90%
	❍ Social	❍<10% ❍ 10-50% ❍ 51-90% ❍>90%
	❍ Corporate Governance	❍<10% ❍ 10-50% ❍ 51-90% ❍>90%
LEI 08.2	Additional information [OPTIONAL] [200 words]	

LEI 08	EXPLANATORY NOTES
LEI 08	The purpose of this indicator is to allow you to indicate whether you systematically research ESG factors in all cases, as opposed to, for example, researching corporate governance in all cases but researching environmental or social factors only in certain cases and to what degree this research impacts your actively managed listed equity portfolio. ESG factors differ in their relevance and materiality across companies, sectors and markets. This indicator does not relate to your final judgements about relevance or materiality, but to the scope of your research processes. All percentages should represent the percentage of the total value of your listed equity holdings that are impacted by each ESG factor. **Systematic** processes review the relevance of ESG factors across different sectors, markets, strategies and factors. Typically, these are a planned, routine part of your investment process for all relevant staff.
ASSESSMENT	
LEI 08	Maximum score: Three ★ This indicator assesses if your organisation systematically reviews E, S and G factors.

Indicator scoring methodology

Selected response	Level score	Further Details
Three ESG factors or less at <10%	⭘	
Two ESG factors at 10-50%	★	
Three ESG factors at 10-50% OR Two ESG factors(s) at 51-90%	★★	
One ESG factor at>90% and two ESG factors at 51-90%	★★★	

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LEI 09	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 1

LEI 09	INDICATOR
LEI 09.1	Indicate which processes your organisation uses to ensure ESG integration is based on robust analysis. ❒ Comprehensive ESG research is undertaken or sourced to determine companies' activities and products. ❒ Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies. ❒ Third-party ESG ratings are updated regularly. ❒ A periodic review of the internal research is carried out. ❒ Structured, regular ESG specific meetings between responsible investment staff and the fund manager or within the investments team ❒ ESG risk profile of a portfolio against benchmark ❒ Analysis of the impact of ESG factors on investment risk and return performance ❒ Other; specify_____ ❒ None of the above
LEI 09.2	Indicate the proportion of your actively managed listed equity portfolio that is subject to comprehensive ESG research as part your integration strategy. ❍<10% ❍ 10-50% ❍ 51-90% ❍>90%
LEI 09.3	Indicate how frequently third party ESG ratings that inform your ESG integration strategy are updated. ❒ Quarterly or more frequently ❒ Bi-Annually ❒ Annually ❒ Less frequently than annually
LEI 09.4	Indicate how frequently you review internal research that builds your ESG integration strategy. ❒ Quarterly or more frequently ❒ Bi-Annually ❒ Annually ❒ Less frequently than annually
LEI 09.5	Describe how ESG information is held and used by your portfolio managers. ❒ ESG information is held within centralised databases or tools, and it is accessible by all relevant staff. ❒ ESG information or analysis is a standard section or aspect of all company research notes or industry/sector analysis generated by investment staff. ❒ Systematic records are kept that capture how ESG information and research were incorporated into investment decisions. ❒ Other; specify_____ ❒ None of the above

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LEI 09.6	Additional information [OPTIONAL]

LEI 09	EXPLANATORY NOTES
LEI 09	The purpose of this indicator is to allow you to describe the quality and management of your ESG information. The indicator does not differentiate between ESG information produced internally and provided via research providers. For guidance and case studies on structuring investment processes refer to chapter 4 of the PRI's ESG Integration publication.
LEI 09.1	This sub-indicator allows you to describe the quality of your research used for ESG integration purposes. Some investors use the same sources of research for both their screening and integration strategies. If this is the case, your responses here will be identical to those you provide in LEI 07. In the 'Other' category, you may reference, e.g., (macro) economic factors or industry/sector analysis. To find out more on how your peers have responded on this practice, view our analysis and visualisation in the **listed equity incorporation interactive data report** available on the Data Portal and the PRI website
LEI 09.5	This sub-indicator allows you to highlight how you ensure that ESG information contributes to your investment decisions. Describe any additional steps you take that are not highlighted by the indicator options. The term **systematic** should be interpreted to mean a planned, routine part of your investment process for all relevant staff.
LOGIC	
LEI 09	Within indicator [LEI 09.2] will be applicable if you report 'Comprehensive ESG research is undertaken or sourced to determine companies' activities and products' in [LEI 09.1]. [LEI 09.3] will be applicable if you report 'Third-party ESG ratings are updated regularly to ensure that portfolio holdings comply with fund policies' in [LEI 09.1]. [LEI 09.4] will be applicable if you report 'A periodic review of internal research is carried out' activities and products' in [LEI 09.1].
ASSESSMENT	
LEI 09.1	Maximum score: Three ★ The assessment will be based on the response to [09.1] and is a core assessed indicator.

Indicator scoring methodology		
Selected response	**Level score**	**Further Details**
'None of the above'	⭘	
One selection	★	
Two selections	★★	
Three or more selections	★★★	

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LEI 10	Indicator status MANDATORY TO REPORT, VOLUNTARY TO DISCLOSE	Purpose CORE ASSESSED	Principle PRI 1

LEI 10	INDICATOR	
LEI 10.1	Indicate which aspects of investment analysis you integrate material ESG information into.	
	Investment analysis	**Proportion of actively managed listed equity exposed to investment analysis**
	❑ Economic analysis	❍<10% ❍ 10-50% ❍ 51-90% ❍>90%
	❑ Industry analysis	❍<10% ❍ 10-50% ❍ 51-90% ❍>90%
	❑ Quality of management	❍<10% ❍ 10-50% ❍ 51-90% ❍>90%
	❑ Analysis of company strategy	❍<10% ❍ 10-50% ❍ 51-90% ❍>90%
	❑ Portfolio weighting	❍<10% ❍ 10-50% ❍ 51-90% ❍>90%
	❑ Security sensitivity and/or scenario analysis	❍<10% ❍ 10-50% ❍ 51-90% ❍>90%
	❑ Fair value/fundamental analysis	❍<10% ❍ 10-50% ❍ 51-90% ❍>90%
	❑ Other; specify_____	❍<10% ❍ 10-50% ❍ 51-90% ❍>90%
LEI 10.2	Indicate which methods are part of your process to integrate ESG information into fair value/fundamental analysis. ❑ Adjustments to forecasted company financials (sales, operating costs, earnings, cash flows) ❑ Adjustments to valuation-model variables (discount rates, terminal value, perpetuity growth rates)) ❑ Valuation multiples ❑ Other adjustments; specify_____	
LEI 10.3	Describe how you integrate ESG information into your portfolio weighting. [200 words]	
LEI 10.4	Describe the methods you have used to adjust the income forecast/valuation tool. [200 words]	
LEI 10.5	Describe how you apply sensitivity and /or scenario analysis to security valuations. [200 words]	
LEI 10.6	Additional information [OPTIONAL] [200 words]	

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LEI 10	EXPLANATORY NOTES
LEI 10	**The indicator [LEI 10.1] is aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations.** The purpose of this indicator is to allow you to describe how and to what degree you internally use ESG information in investment analysis and decision-making. For guidance and case studies refer to chapter 1 of the PRI's ESG Integration publication and the Guidance and case studies for ESG integration: equities and fixed income In this indicator, **portfolio weighting** refers to changes in the construction of your portfolio due to ESG integration, i.e., underweighting or overweighting certain sectors due to ESG risk. It should not be confused with screening, which should be reported in indicators [LEI 05], [LEI 06] and [LEI 07]. To find out more on how your peers have responded on this practice, view our analysis and visualisation in the **listed equity incorporation interactive data report** available on the Data Portal and the PRI website
LOGIC	
LEI 10	Within indicator [LEI 10.2] and [LEI 10.4] are applicable if you report 'Fair value/fundamental analysis' in [LEI 10.1]. [LEI 10.3] is applicable if you report 'Portfolio weighting in [LEI 10.1]. [LEI 10.5] is applicable if you report 'Sensitivity and/or scenario analysis' in [LEI 10.1].
ASSESSMENT	
LEI 10	Maximum score: Three ★ The assessment of this indicator is based on your responses to [10.1].

Indicator scoring methodology

Selected response	Level score	Further Details
No response selected OR one option any proportion OR two options less than 50%	○	
Two options more than 51%	★	
At least three options more than 11% – one of which is "Portfolio weightings" and/or "Fair value analysis"	★★	
Three or more options more than 51%– one of which is "Portfolio weightings" and/or "Fair value analysis"	★★★	

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LEI 10	Definitions
Economic analysis	This analysis involves assessing how political, fiscal, monetary, market and ESG factors affect the economy. Some factors that can affect an economy are: climate change; water scarcity; corruption; government policies; inflation; interest rates; unemployment; etc.
Industry analysis	This analysis involves assessing how political, regulatory, market and ESG factors affect an industry. Some factors that can affect an industry are: availability of resources; cyber security; supply chain standards; supply and demand; global, national and local regulation; etc.
Quality of management	The analysis involves assessing a company's corporate governance and its management of the impact of its operations on the environment and society. For example, management of carbon footprint, diversity, culture, executive pay.
Analysis of company strategy	The analysis involves assessing how political, regulatory, market and ESG factors affect the competitive positioning and performance of a company. It involves reviewing the company's products and services and their exposure to investment risks and opportunities and understanding the competitive positioning of the company in each of its markets.
Sensitivity / Scenario Analysis	The analysis includes multiple factors representing the investment impacts of future trends including their risk profile at portfolio level, for example, resource scarcity, technology developments.
Fair value/fundamental analysis	The analysis and quantification of economic, industry, company-specific and ESG factors for inclusion into forecasted financial statements and valuation models.

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SECTION

ESG incorporation in passively managed listed equities

LEI 11	Indicator status MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	Purpose DESCRIPTIVE	Principle PRI 1

LEI 11	INDICATOR	
LEI 11.1	Indicate if you manage passive listed equity funds that incorporate ESG factors in the index construction methodology.	
	❍ Yes	❍ No
LEI 11.2	Indicate the percentage of your total passive listed equity funds for which ESG factors are incorporated in the index construction methodology.	
	ESG incorporation in index construction methodology (% of total passive listed equity funds)	
	❍<10% ❍ 10-50% ❍ 51-90% ❍>90%	
LEI 11.3	Specify index/fund name, provide a brief description of ESG methodology and indicate which of the following ESG incorporation strategies you apply.	
	Index/fund name and brief description of ESG methodology	**ESG incorporation strategy** (select all that apply)
	[200 words]	❑ Screening ❑ Thematic ❑ Integration of ESG factors ❑ Other
	[same as above]	[same as above]
	[same as above]	[same as above]
	[same as above]	[same as above]
	[same as above]	[same as above]
LEI 11.4	Additional information [OPTIONAL]	

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LEI 11	EXPLANATORY NOTES
LEI 11	**The indicator [LEI 11.1] is aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations.**
LEI 11.3	For definitions of passive and active management, please refer to the preface of this document or the Main Definitions document. For definitions of ESG incorporation in passively managed funds, please refer to the Main Definitions document.
LOGIC	
LEI 11	This indicator is applicable if you reported a passive strategy in relationship to listed equity investments in [OO LE 01]. You will only be required to report on listed equity investments that are relevant to your responses in [OO LE 01]. Within this indicator, if 'Yes' is reported in [LEI 11.1], [LEI 11.2] and [LEI 11.3] will be applicable. Indicators [LEI 12-13] will be applicable if 'Yes' is reported in [LEI 11.1].

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SECTION

Outputs and outcomes

LEI 12	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle PRI 1

LEI 12	INDICATOR	
LEI 12.1	Indicate how your ESG incorporation strategies have influenced the composition of your portfolio(s) or investment universe.	
	Screening	
	Describe any reduction in your starting investment universe or other effects.	Specify the percentage reduction (+/- 5%)
	[200 words]	____ %
	Thematic	
	Describe any alteration to your investment universe or other effects.	
	[200 words]	
	Integration of ESG factors	
	Select which of these effects followed your ESG integration.	
	❑ Reduce or prioritise the investment universe ❑ Overweight/underweight at sector level ❑ Overweight/underweight at stock level ❑ Buy/sell decisions ❑ Engagement / Voting ❑ Other; specify _____ ❑ None of the above	
	Index incorporating ESG factors (for passively managed funds)	
	Describe the influence on composition or other effects.	
	[200 words]	
LEI 12.2	Additional information [OPTIONAL]	
	[1000 words]	

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LEI 12	EXPLANATORY NOTES
LEI 12	**The indicator [LEI 12.1] is aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations.** To find out more on how your peers have responded on this practice, view our analysis and visualisation in the **listed equity incorporation interactive data report** available on the Data Portal and the PRI website
LEI 12.1	You are encouraged to discuss whether the ESG incorporation approach has affected portfolio design and construction (e.g. by reference to particular sectors, geographies). You can provide further information on specific ESG factors that have affected individual investment views, decisions and performance under indicator LEI 13.
LOGIC	
LEI 12.1	[LEI 12.1] will be applicable if either (1) you reported 'Yes' to [LEI 11.1] or (2) if you reported that a screening, thematic or integration strategy is applied to some part of your actively managed listed equity in [LEI 01]. The relevant active ESG incorporation strategies (screening, thematic, integration) will be applicable depending on your responses in [LEI 01]. The field 'Index incorporating ESG factors (for passively managed funds)' will be applicable depending on your response in [LEI 11.1].

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LEI 13	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle PRI 1

LEI 13	INDICATOR		
LEI 13.1	Provide examples of ESG factors that affected your investment view and/or performance during the reporting year.		
	ESG factor and explanation	**ESG incorporation strategy applied**	**Impact on investment decision or performance**
	[200 words]	• Screening • Thematic • Integration • Combination of ESG incorporation strategies • Index incorporating ESG factors [dropdown]	[200 words]
	[same as above]	[same as above]	[same as above]
	[same as above]	[same as above]	[same as above]
	[same as above]	[same as above]	[same as above]
	[same as above]	[same as above]	[same as above]
LEI 13.2	Additional information		
	[1000 words]		

LEI 13	EXPLANATORY NOTES
LEI 13	You are encouraged to provide at least three, and up to five, examples. As far as practicable, these should provide the clearest illustration of how ESG factors were incorporated. Depending on your organisation, the examples may focus on different ESG factors or different sectors or may have resulted in different investment decisions (e.g. exclude, buy, sell, hold, overweight, underweight). **ESG factor and explanation—**you are not expected to disclose the name of the company. Generic responses (such as UK bank, Chinese retailer, etc.) are adequate. Alternatively, you might describe how your policy on climate change and emissions might have impacted your investment decision or performance". **Impact on investment view or performance** This can include the number of holdings in your portfolio that is affected and in which sectors.
LOGIC	
LEI 13.1	Under column "ESG incorporation strategy applied", "Screening", "Thematic", or "Integration" options will be applicable depending on your active ESG incorporation strategy reported in [LEI 01]. The option "Index incorporating ESG factors (for passively managed funds)" will be applicable depending on your response to [LEI 11.1]. [LEI 13.1] will be applicable if you reported 'Yes' to [LEI 11.1] or that a screening, thematic or integration strategy is applied to some part of your actively managed listed equity in [LEI 01].

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PRI REPORTING FRAMEWORK 2019
Direct — Listed Equity Active Ownership

November 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 identify which indicators are relevant to your organisation.

Top bar

Key information about each indicator is highlighted in the top bar, including the indicator status (mandatory or voluntary), the purpose of the indicator and which PRI Principle it relates to.

	Indicator status	Purpose	Principle
xxx 01	*MANDATORY*	*CORE ASSESSED*	*PRI 2*

Indicator status

MANDATORY	Mandatory indicators reflect core practices. These responses will be made public and must be completed to submit the framework.
MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	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.
VOLUNTARY	Voluntary indicators concern 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 to your organisation. Please refer to the logic box for more information.
Peering	These indicators are used to determine your peer groups for assessment purposes.
Core assessed	These indicators form the core of the assessment and represent the majority of your final assessment score.
Additional assessed	These indicators represent more advanced or alternative practices and contribute to a smaller part of your score.
Descriptive	These are open-ended narrative indicators, allowing you to describe your activities.

Underneath the indicator

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

xxx 01	**EXPLANATORY NOTES**
xxx 01.1	This provides guidance about how to interpret the sub-indicators, including examples of what can be reported.
xxx 01.2	
LOGIC	
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.
ASSESSMENT	
xxx 01	This provides a brief overview of the pilot assessment approach for this indicator.

xxx 01	**DEFINITIONS**
xxx 01	Specific terms that are used in the indicator are defined here.

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PRI Principles for Responsible Investment

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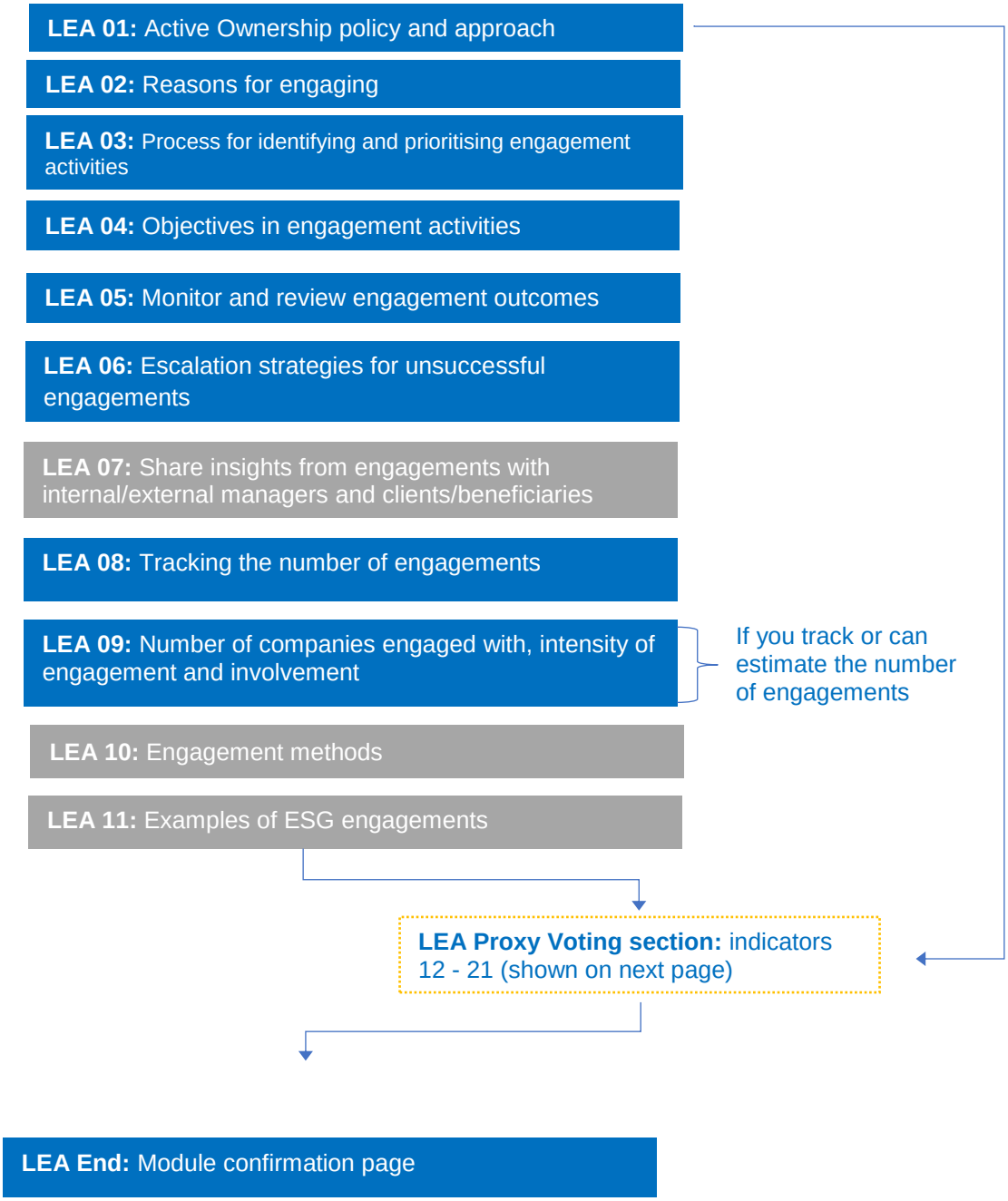
Pathways through the module



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LEA Engagement section: indicators 02 - 11. (shown on previous page)

LEA 12: Typical approach to (proxy) voting decisions

If you hire service provider(s) who make voting decisions on your behalf, except in some pre-defined scenarios for which you review and make voting decisions

LEA 13: Percentage of voting recommendations reviewed

LEA 14: Securities lending programme

LEA 15: Informing companies of concerns held prior to voting

LEA 16: Informing companies of the rationale for abstaining/voting against management

LEA 17: Percentage of (proxy) votes cast

LEA 18: Proportion of ballot items that were for/against/abstentions

LEA 19: Escalation strategies for unsuccessful voting

LEA 20: Shareholder resolutions

LEA 21: Examples of (proxy) voting activities

LEA End: Module confirmation page

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Preface

The information reported in this module will enable your stakeholders to understand how your organisation carries out the following activities in relation to listed equities: (a) your own engagement activities (e.g., engagement conducted by internal staff, both collaboratively and individually) or any engagement activities undertaken on your behalf by service providers; and (b) (proxy) voting and shareholder resolutions decided upon by you or on your behalf by service providers.

This module does not cover engagement and/or (proxy) voting activities carried out on your behalf by external investment managers. These activities are covered in the module on external managers entitled *Indirect — Manager Selection, Appointment and Monitoring (SAM).*

Note: This module has two different sections.

Summary of updates

2017 Indicator	Update summary
LEA Module	This module has undergone a major review and has been updated accordingly. As such, every indicator within the Listed Equity —— Active Ownership module has been impacted to a varying degree.
LEA 01 – 05, 07, 09 – 12; 14 – 15, 17, 20 – 24.	Sub-indicators have been reworded, removed and/or renumbered, selection options have been amended or added, and new sub-indicators have been added. Assessment has been amended.
LEA 06, 16, 19	New indicators have been added.
LEA 08, 13, 18	Indicators have been removed.

To view a detailed summary of the changes to the module, please click here.

For any word limit in the module, please click here.

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PRI Principles for Responsible Investment

OVERVIEW

LEA 01	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 2

LEA 01	INDICATOR	
LEA 01.1	Indicate whether your organisation has an active ownership policy.	
	❍ Yes	❍ No
LEA 01.2	Attach or provide a URL to your active ownership policy.	
LEA 01.3	Indicate what your active engagement policy covers.	
	General approach to Active Ownership	❒ Conflicts of interest ❒ Alignment with national stewardship code requirements ❒ Assets/funds covered by active ownership policy ❒ Expectations and objectives ❒ Engagement approach ❒ (Proxy) voting approach ❒ Other; specify _____ ❒ None of the above
	Engagement	❒ ESG issues ❒ Prioritisation of engagement ❒ Methods of engagement ❒ Transparency of engagement activities ❒ Due diligence and monitoring process ❒ Insider information ❒ Escalation strategies ❒ Service Provider specific criteria ❒ Other; specify _____
	Voting	❒ ESG issues ❒ Prioritisation and scope of voting activities ❒ Methods of voting ❒ Transparency of voting activities ❒ Regional voting practice approaches ❒ Filing or co-filing resolutions ❒ Company dialogue pre/post-vote

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		❒ Decision-making processes ❒ Securities lending processes ❒ Other (specify); _____
LEA 01.4	Do you outsource any of your active ownership activities to service providers?	
	❑ Yes	❑ No
LEA 01.5	Where active ownership activities are conducted by service providers, indicate whether your active ownership policy covers any of the following:	
	❑ Outline of service provider's role in implementing your organisation's active ownership policy ❑ Description of considerations included in service provider selection and agreements ❑ Identification of key ESG frameworks which service providers must follow ❑ Outline of information- sharing requirements of service providers ❑ Description of service provider monitoring processes ❑ Other; (specify) _____ ❑ None of the above	
LEA 01.6	Additional Information. [OPTIONAL]	
	[1000 words]	

LEA 01	**EXPLANATORY NOTES**
LEA 01	This indicator is aligned with the ICGN Global Stewardship Principles. The indicator [LEA 01.2] is aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations.
LEA 01.1	The policy can be a component of or separate to your overall responsible investment policy. Investors may define their organisation's active ownership policy directly in their investment policy. By doing so, they can signal that active ownership is not a standalone practice but a means to improve decision making and execute investment objectives.
LEA 01.5	Where an investor decides to outsource active ownership activities to specialised service providers, the active ownership policy can contain less detail, but it is still important to outline the value of engagement and voting for the organisation, and to guide the relationship with these selected third parties. For more information about the options identified, refer to the PRI's 'A Practical Guide to Active Ownership in Listed Equity'.
LEA 01.6	This may include a discussion of: • how often your engagement policy is reviewed, and the level of internal endorsement within your organisation's governance structure for responsible investment (e.g., board, trustees, etc.); • your organisation's objectives in undertaking engagement activities, including whether these activities are informed by and support investment decision making; • your organisation's approach to avoiding, identifying and managing conflicts of interest, including the process to communicate possible conflicts of interest, and remedies to mitigate them, to clients or beneficiaries;

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	• your organisation's procedures for monitoring ESG practices and performance by investee companies to identify cases for engagement; • whether engagement is conducted only with companies that are held in your portfolios, or also with companies that are not; • whether your engagements are primarily proactive to ensure that ESG issues are well managed in a preventive manner, or reactive to address issues that may have already occurred; • who carries out the engagement (e.g., specialised in-house ESG teams, portfolio managers, or both, etc.), and how you ensure your organisation has the appropriate capacity and experience for engagement activities (e.g., human resources, time and training); • whom you seek to engage with within companies (e.g., board representatives, chairman, CEO, CSR/IR managers); • whether your organisation typically engages with companies on specific ESG issues (e.g., emissions, climate change or other specific ESG issues); • your organisation's approach in case of unsuccessful engagement (e.g., public statement, overweight/underweight, filing resolutions, divestment, litigation); • your organisation's tracking of engagement meetings and interactions, and its commitment to transparency towards clients/beneficiaries and the public.
LOGIC	
LEA 01	[LEA 01 – LEA 02] are applicable if in [OO 10.1] you select "We engage with companies on ESG issues via our staff, collaborations or service providers." [LEA 01] will be applicable if in [OO 10.1] you select "We cast our (proxy) votes directly or via dedicated voting providers." [LEA 01.2] and [LEA 01.3] will be applicable if you report "Yes" in [LEA 01.1]. [LEA 01.5] will be applicable if you report "Yes" in [LEA 01.4].
ASSESSMENT	
	Engagement
	Maximum score: Three ★ The assessment of this indicator is based on your responses to [01.1] and [01.3] and contributes attributed to the assessment of the Engagement section.
	Indicator scoring methodology

Selected response	Level score	
"No" in LEA 01.1 or "Yes" in LEA 01.1, and one option selected in the Engagement section of LEA 01.3.	○	
"Yes" in LEA 01.1 and two options selected in the Engagement section of LEA 01.3.	★	"Other" will not count as a selection.
"Yes" in LEA 01.1 and three options selected in the Engagement section of LEA 01.3.	★★	"Other" will not count as a selection.
"Yes" in LEA 01.1 and four options selected in the	★★★	"Other" will not count as a selection.

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	Engagement section of LEA 01.3.		
	Voting		
	Maximum score: Three ★ The assessment of this indicator is based on your responses to [01.1] and [01.33] and contributes to the assessment of the Voting section.		
	Indicator scoring methodology		
	Selected response	**Level score**	
	"No" in LEA 01.1 or "Yes" in LEA 01.1, and one option selected in the Voting section of LEA 01.3.	⭘	
	"Yes" in LEA 01.1 and two options selected in the Voting section of LEA 01.3.	★	"Other" will not count as a selection.
	"Yes" in LEA 01.1 and three options selected in the Voting section of LEA 01.3.	★★	"Other" will not count as a selection.
	"Yes" in LEA 01.1 and four options selected in the Voting section of LEA 01.3.	★★★	"Other" will not count as a selection.

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SECTION

Engagement

LEA 02	Indicator status MANDATORY	Purpose CORECORE	Principle PRI 1, 2, 3

LEA 02	INDICATOR	
LEA 02.1	Indicate the method of engagement, giving reasons for the interaction.	
	Type of engagement	**Reason for interaction**
	Individual/Internal staff engagements	❒ To influence corporate practice (or identify the need to influence it) on ESG issues ❒ To encourage improved/increased ESG disclosure ❒ To gain an understanding of ESG strategy and/or management ❒ We do not engage via internal staff
	Collaborative engagements	❒ To influence corporate practice (or identify the need to influence it) on ESG issues ❒ To encourage improved/increased ESG disclosure ❒ To gain an understanding of ESG strategy and/or management ❒ We do not engage via collaborative engagements
	Service provider engagements	❒ To influence corporate practice (or identify the need to influence it) on ESG issues ❒ To encourage improved/increased ESG disclosure ❒ To gain an understanding of ESG strategy and/or management ❒ We do not engage via service providers
LEA 02.2	Indicate whether your organisation plays a role in the engagement process that your service provider conducts.	
	❍ Yes	❍ No
LEA 02.3	Indicate the role(s) you play in engagements that your service provider conducts on your behalf. ❒ We discuss the topic of the engagement (or ESG issue(s)) of engagement ❒ We discuss the rationale for the engagement ❒ We discuss the objectives of the engagement ❒ We select the companies to be engaged with	

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	❒ We discuss the frequency/intensity of interactions with companies ❒ We discuss the next steps for engagement activity ❒ We participate directly in certain engagements with our service provider ❒ Other; specify _____ ❍ We play no role in engagements that our service provider conducts.
LEA 02.4	Additional information. [OPTIONAL] [1000 words]

LEA 02	**EXPLANATORY NOTES**
LEA 02	The indicators [LEA 02.1] and [LEA 2.3] are aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations, and [LEA 02.1] and [LEA 02.2] are ICGN Global Stewardship Principles.
LEA 02.1	Option "**To influence corporate practice** (or identify the need to influence it) **on ESG issues."** Option "**To encourage improved/increased ESG disclosure."** These are engagements that seek better ESG-related disclosure and transparency. These interactions relate to Principle 2 and Principle 3. Option "'**To gain an understanding of ESG strategy and/or management."** This can be selected when engagement occurs with the direct or indirect intention of gaining a better understanding/knowledge of ESG issues in order to assist in investment decision making. Principle 5 of the PRI, together with several voluntary codes and guidelines (including existing national stewardship codes, the ICGN stewardship principles and the OECD paper of Responsible Business Conduct for Institutional Investors), encourages investors to collaborate with peers to engage with investee companies. Collaborative engagements allow individual investors to share information, time and resources, while communicating with portfolio companies in a unified voice on areas of common concern.
LEA 02.2	This indicator refers to engagement in relation to your organisation's internally and externally managed assets that is conducted by service providers. Any engagements carried out by your external investment managers are covered in the *Indirect Manager Selection, Appointment and Monitoring (SAM)* module.
LEA 02.4	Your response may include a discussion of: • why your organisation does not engage via individual, collective and/or service providers; • your role in setting engagement/active ownership objectives with your service providers; • how you monitor/oversee service provider activities; • any joint engagement conducted with the service provider (e.g. participating in company meetings)
LOGIC	
LEA 02	Your responses here are gateways for further sections in this module. Selecting the following options in [LEA 02.1] will trigger the following indicators:

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	• selecting Individual/ Internal staff engagement will trigger the Individual/Internal staff engagement options in [LEA 4 – 6]; • selecting Collaborative engagement will trigger the collaborative engagement options in [LEA 4 – 6]; • selecting Service Provider engagement will trigger the service provider engagement options in [LEA 4 – 6].] In addition, if engagements that are reported for the reasons given above are conducted by internal staff, service providers and/or collaboratively, indicators [LEA 08 - 11] will be applicable. [LEA 02.2] is applicable if your organisation engages via service providers in [LEA 02.1]. [LEA 02.3] is applicable if "Yes" is selected in [LEA 02.2].
ASSESSMENT	
LEA 02	Your aggregate LEA score will be based on your 'primary' method of engagement (directly by internal staff, in collaboration with other investors, or through commercial service providers). Whether your method is 'primary' or not will be determined by your responses to LEA 09.1–09.3, the number of engagements combined with how comprehensive they were, and the level of your involvement. All reported assessed indicators will be included in your module scorecard. The PRI does not suggest or prefer a particular engagement method. Signatories can score the top grade by using any one or a combination of engagement methods. Maximum score: Three ★ The assessment of this indicator is based on your responses to [02.2] and [02.3].

Indicator scoring methodology

Selected response	Level score	Further Details
No engagements conducted by service providers	N/A	
"No."	⭘	
"Yes" in [02.2], one option selected in [02.3].	★	"Other" will not count as a selection.
"Yes" in [02.2], 2–3 options selected in [02.3].	★★	"Other" will not count as a selection.
"Yes" in [02.2], >3 options selected in [02.3].	★★★	"Other" will not count as a selection.

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LEA 02	DEFINITIONS
Engagement categories based on who conducts them	
There are many different categories of engagement. Investors engage with companies directly in their own name, in collaboration with other investors (independently or through investor networks/membership organisations), and through commercial service providers. The distinctions between the various types of engagement are not always clear-cut. Please use the definitions below and your best professional judgement when deciding how to classify your organisation's engagements. Review the process indicators for each category, and determine which indicator(s) best fit your organisation's business model. Please contact the Reporting and Assessment team if you require additional clarification.	
Individual/Internal staff engagement	The defining characteristics of an individual/internal staff engagement are that: • it is carried out by your internal staff only, with no involvement or support from other investors, investor networks or service providers; and • it is conducted in the name of your organisation (i.e., the companies with which you engage can identify your organisation individually), and you do not act on behalf of other organisations. Being a signatory to CDP should not be counted as an engagement, but rather reported as part of the way you support responsible investment in Strategy & Governance SG08. However, if your organisation engages in its own name with companies on their carbon emissions, water or forest footprint disclosures as a follow-up to CDP disclosure requests and/or as part of CDP's Carbon Action or Aiming for A initiatives, you should report these engagements as individual/internal staff engagements.
Collaborative engagement	Collaborative engagement is an engagement that an investor conducts jointly with other investors. This includes: • groups of investors working together without the involvement of a formal investor network or other membership organisation(s); • groups of investors working together within a formal investor network or other membership organisation, with some level of support, but with individual members of the collaboration having responsibility for most of the engagement activity; and • collaborative engagement coordinated and facilitated by a formal investor network (e.g., PRI-coordinated investors' coalitions). Being a signatory to CDP should not be counted as an engagement, but rather reported as part of the way you support responsible investment in Strategy & Governance SG08. However, if your organisation collaborates with a group of investors to engage with companies on their carbon emissions, water or forest footprint disclosures as a follow-up to CDP disclosure requests, you should report these engagements as collaborative engagements.
Service-provider engagement	Service-provider engagements include engagements conducted via: • commercial parties that provide stand-alone engagement services without managing their clients' underlying assets; and • investor organisations that conduct engagement on their members' behalf and have an explicit mandate from their members to represent them. These include engagements conducted entirely on an outsourced basis, as well as those facilitated by the service provider with some involvement of the investor's own staff.

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LEA 03	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 2

LEA 03	INDICATOR	
LEA 03.1	Indicate whether your organisation has a formal process for identifying and prioritising engagements.	
	❍ Yes	❍ No
LEA 03.2	Indicate the criteria used to identify and prioritise engagements for each type of engagement.	
	Type of engagement	**Criteria used to identify/prioritise engagements**
	Individual / Internal staff engagements	❑ Geography/market of the companies ❑ Materiality of the ESG factors ❑ Exposure (size of holdings) ❑ Responses to ESG impacts that have already occurred ❑ Responses to divestment pressure ❑ Consultation with clients/beneficiaries ❑ Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) ❑ Follow-up from a voting decision ❑ Client request ❑ Breaches of international norms ❑ Other (; specify) _____ ❍ We do not outline engagement criteria for our individual engagements
	Collaborative engagements	❑ Potential to enhance knowledge of ESG issues through other investors ❑ Ability to have greater impact on ESG issues ❑ Ability to add value to the collaboration ❑ Geography/market of the companies targeted by the collaboration ❑ Materiality of the ESG factors addressed by the collaboration ❑ Exposure (size of holdings) to companies targeted by the collaboration ❑ Responses to ESG impacts addressed by the collaboration that have already occurred ❑ Responses to divestment pressure ❑ Follow-up from a voting decision ❑ Alleviate the resource burden of engagement ❑ Consultation with clients/beneficiaries ❑ Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) ❑ Other (; specify) _____

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		❍ We do not outline engagement criteria for our collaborative engagements providers.
	Service-provider engagements	❑ Geography/market of the companies ❑ Materiality of the ESG factors ❑ Exposure (size of holdings) ❑ Responses to ESG impacts that have already occurred ❑ Responses to divestment pressure ❑ Consultation with clients/beneficiaries ❑ Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) ❑ Follow-up from a voting decision ❑ Client request ❑ Breaches of international norms ❑ Other (; specify) _____ ❍ We do not outline engagement criteria for our service providers
LEA 03.3	Additional information. [OPTIONAL] [1000 words]	

LEA 03	**EXPLANATORY NOTES**		
LEA 03	The indicator [LEA 03.1] is aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations.		
LEA 03.1	This indicator allows you to outline the criteria used to identify and prioritise your organisation's engagement activities.		
LOGIC			
LEA 03	[LEA 03.1] is applicable if you have engagements conducted by internal staff, in collaboration with other investors, or through service providers in [LEA 02.1].		
ASSESSMENT			
LEA 03	Maximum score: Three ★ The assessment of this indicator is based on each engagement method section in [03.1] and [03.2].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	"No" in LEA 03.1.	⭘	
	"Yes" in 03.1 and one option in LEA 03.2.	★	"Other" will not count as a selection.
	"Yes" in 03.1 and two options in LEA 03.2.	★★	"Other" will not count as a selection.
	"Yes" in 03.1 and three or more options in LEA 03.2.	★★★	"Other" will not count as a selection.

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LEA 04	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 2

LEA 04	INDICATOR	
LEA 04.1	Indicate whether you define specific objectives for your organisation's engagement activities.	
	Individual / Internal staff engagements	❒ All engagement activities ❒ Majority of engagement activities ❒ Minority of engagement activities ❍ We do not define specific objectives for engagement activities carried out by internal staff
	Collaborative engagements	❒ All engagement activities ❒ Majority of engagement activities ❒ Minority of engagement activities ❍ We do not define specific objectives for engagement activities carried out through collaboration
	Service-provider engagements	❒ All engagement activities ❒ Majority of engagement activities ❒ Minority of engagement activities ❍ We do not define specific objectives for engagement activities carried out by our service providers
LEA 04.2	Additional information. [OPTIONAL]	
	[1000 words]	

LEA 04	EXPLANATORY NOTES
LEA 04	The indicator [LEA 04.1] is aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations.
LEA 04.2	This indicator allows you to outline the extent to which your organisation's engagement activities have clearly defined objectives.
LEA 04.3	Additional information on defining specific objectives can include: • whether/ how engagement objectives are defined; • your role in setting engagement objectives
LOGIC	
LEA 04	[LEA 04.1] is applicable if you have engagements conducted by internal staff, in collaboration with other investors, or through service providers in [LEA 02.1].

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ASSESSMENT			
LEA 04	Maximum score: Three ★ The assessment of this indicator is based on your responses to [04.1].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	"We do not define specific objectives for engagement activities" in LEA 04.1	○	
	"Minority of engagement activities" in LEA 04.1	★	
	"Majority of engagement activities" in LEA 04.1	★★	
	"All engagement activities" in LEA 04.1	★★★	

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LEA 05	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 2

LEA 05	INDICATOR	
LEA 05.1	Indicate whether you monitor and/or review engagement outcomes.	
	Individual / Internal staff engagements	❍ Yes, in all cases ❍ Yes, in a majority of cases ❍ Yes, in a minority of cases ❍ We do not monitor, or review engagement outcomes when the engagement is carried out by our internal staff.
	Collaborative engagements	❍ Yes, in all cases ❍ Yes, in a majority of cases ❍ Yes, in a minority of cases ❍ We do not monitor, or review engagement outcomes when the engagement is carried out through collaboration.
	Service-provider engagements	❍ Yes, in all cases ❍ Yes, in a majority of cases ❍ Yes, in a minority of cases ❍ We do not monitor, or review engagement outcomes when the engagement is carried out by our service providers.
LEA 05.2	Indicate whether you do any of the following to monitor and/or review the progress of engagement activities.	
	Individual / Internal staff engagements	❒ Define timelines/milestones for your objectives ❒ Track and/or monitor progress against defined objectives and/or KPIs ❒ Track and/or monitor the progress of action taken when original objectives are not met ❒ Revisit and, if necessary, revise objectives on a continuous basis ❒ Other (Other; specify) _____
	Collaborative engagements	❒ Define timelines/milestones for your objectives ❒ Track and/or monitor progress against defined objectives and/or KPIs ❒ Track and/or monitor the progress of action taken when original objectives are not met ❒ Revisit and, if necessary, revise objectives on a continuous basis ❒ Other (; specify) _____
	Service-provider engagements	❒ Define timelines/milestones for your objectives ❒ Track and/or monitor progress against defined objectives and/or KPIs

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		❒ Track and/or monitor the progress of action taken when original objectives are not met ❒ Revisit and, if necessary, revise objectives on a continuous basis ❒ Other; specify _____
LEA 05.3	Additional information. [OPTIONAL] [1000 words]	

LEA 05	**EXPLANATORY NOTES**
LEA 05.3	You can include a discussion of: • whether/how the progress of engagements is tracked (e.g. milestones, intermediate targets); • how you monitor action taken by companies (e.g. through third- party research, internal research, or both); • how regularly the research/information is updated; • any auditing procedures to ensure information recorded is accurate.
LOGIC	
LEA 05	[LEA 05.1] is applicable if you have engagements conducted by internal staff, in collaboration with other investors, or through service providers in [02.1]. [LEA 05.2] is applicable if any "Yes" option was selected in [LEA 05.1].
ASSESSMENT	

LEA 05

Maximum score: Three ★

The assessment of this indicator is based on whether you monitor and/or review engagements in [05.1] and [05.2].

Indicator scoring methodology

Selected response	Level score	Further Details
"We do not monitor review engagement outcomes" in LEA 055.1.	⭘	
"Yes, in a majority of cases" in LEA 05.1 and one option in LEA 05.2, OR "Yes, but in a minority of cases" in LEA 05.1.	★	"Other" will not count as a selection.
"'Yes, in all cases" in LEA 05.1 and one option in LEA 05.2, OR "Yes, in a majority of cases" in LEA 05.1 and two options in LEA 05.2.	★★	"Other" will not count as a selection.
"Yes, in all cases" in LEA 055.1 and at least two options in LEA 055.2, OR "Yes, in a majority of cases" in LEA 05.1 and at least 3 options in LEA 05.2.	★★★	"Other" will not count as a selection.

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LEA 06	Indicator status MANDATORY	Purpose ADDITIONAL ASSESSED	Principle PRI 2,4

LEA 06	INDICATOR	
LEA 06.1	Indicate whether your organisation has an escalation strategy when engagements are unsuccessful.	
	❍ Yes	❍ No
LEA 06.2	Indicate the escalation strategies used at your organisation following unsuccessful engagements. ❒ Collaborating with other investors ❒ Issuing a public statement ❒ Filing/submitting a shareholder resolution ❒ Voting against the re-election of the relevant directors ❒ Voting against the board of directors or the annual financial report ❒ Submitting nominations for election to the board ❒ Seeking legal remedy / litigation ❒ Reducing exposure (size of holdings) ❒ Divestment ❒ Other; specify _____	
LEA 06.3	Additional information. [OPTIONAL] [1000 words]	

LEA 06	EXPLANATORY NOTES		
LEA 06	Option to '**Invest**' refers to a situation where engagement has occurred pre-investment, and following the results of the engagement, you have decided to invest. It has been provided to distinguish it from the '**Increase holdings**' option, which refers to engagement post-investment.		
LOGIC			
LEA 06	[LEA 06] is applicable if you have engagements conducted by internal staff, in collaboration with other investors, or through service providers in [02.1]. [LEA 06.2] is applicable if "Yes" is selected in [LEA 06.1].		
ASSESSMENT			
LEA 06	Maximum score: Three ★ The assessment of this indicator is based on your responses to [06.1] and [06.2].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	"No" in [06.1] or "Yes" in [06.1],] and no selection in [06.2].]	○	
	"Yes" in [06.1] and one option or more in [06.2].	★★★	"Other" will not count as a selection.

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PRI Principles for Responsible Investment

LEA 07	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PRI 1,2

LEA 07	INDICATOR
LEA 07.1	Indicate whether insights gained from your organisation's engagements are shared with investment decision-makers.
	Individual/Internal staff engagements
	❍ Yes, systematically ❍ Yes, occasionally ❍ No
	Collaborative engagements
	❍ Yes, systematically ❍ Yes, occasionally ❍ No
	Service-provider engagements
	❍ Yes, systematically ❍ Yes, occasionally ❍ No
LEA 07.2	Indicate the practices used to ensure that information and insights gained through engagements are shared with investment decision -makers.
	❑ Involving investment decision-makers when developing an engagement programme ❑ Holding investment team meetings and/or presentations ❑ Using IT platforms/systems that enable data sharing ❑ Internal process that requires portfolio managers to re-balance holdings based on interaction and outcome levels ❑ Other; specify _____ ❍ None
LEA 07.3	Indicate whether insights gained from your organisation's engagements are shared with your clients/beneficiaries.
	Individual/Internal staff engagements
	❍ Yes, systematically ❍ Yes, occasionally ❍ No
	Collaborative engagements
	❍ Yes, systematically ❍ Yes, occasionally ❍ No
	Service-provider engagements
	❍ Yes, systematically ❍ Yes, occasionally ❍ No
LEA 07.4	Additional information. [OPTIONAL] [1000 words]

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LEA 07	EXPLANATORY NOTES
LEA 07.1	This indicator allows you to explain whether you have a formal process for sharing information derived from engagement with your internal or external investment decision makers (i.e., to link PRI Principle 1 and Principle 2). This indicator mirrors indicator LEI 05. This aspect is addressed in both the LEI and LEA modules to highlight the link between Principles 1 and 2 and to reward this linkage from both the listed-equity incorporation and active ownership standpoints. Report "Yes, systematically" if you have a formal system or process. This may, for example, consist of meetings or the recording of the results of an engagement on an IT system that is shared with investment staff. Report "Yes, occasionally" if the information is shared in some cases, but not according to a formal process of this kind. To find out more on how your peers have responded to this practice, view our listed equity active ownership interactive data report. These are all available on the Data Portal and the PRI website.
LEA 07.3	This indicator allows you to explain whether you have a formal process for sharing information derived from engagement with your client and/or beneficiaries. Report "'Yes, systematically" if you have a formal system or process. Report "'Yes, occasionally" if the information is shared in some cases, but not according to a formal process of this kind.
LEA 07.4	This can include a discussion of: • how you decide which information to pass on to investment decision makers; • what you expect investment decision makers to do with the insights you pass on; and/or • how you monitor their use of the insights you pass on; • whether ESG data collected through engagement feeds into an internal ratings tool/platform; • whether your organisation's communication approach with external managers differs from that communication approach with internal decision -makers.
LOGIC	
LEA 07	[LEA 07] is applicable if you have engagements conducted by internal staff, in collaboration with other investors, or through by service providers in [02.1]. [LEA 07.2] will be applicable if "Yes" is reported in [LEA 07.1].].
ASSESSMENT	
LEA 07	Maximum score: Three ★ per engagement implementation group. The assessment of this indicator is based on your responses to [07.1] and [07.2].

Indicator scoring methodology

Selected response	Level score	Further Details
"No"	⭘	
"'Yes" in [07.1] and one option in [07.2].	★	
"'Yes" in [07.1] and two options in [07.2].	★★	
"'Yes" in [07.1] and three options in [07.2].	★★★	

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LEA 08	Indicator status MANDATORY	Purpose GATEWAY	Principle PRI 2

LEA 08	INDICATOR	
LEA 08.1	Indicate whether you track the number of your engagement activities.	
	Type of engagement	**Tracking engagements**
	Individual/Internal staff engagements	❍ Yes, we track the number of engagements in full. ❍ Yes, we partially track the number of our engagements. ❍ We do not track.
	Collaborative engagements	❍ Yes, we track the number of collaborative engagements in full. ❍ Yes, we partially track the number of our collaborative engagements. ❍ We do not track.
	Service-provider engagements	❍ Yes, we track the number of service-provider engagements in full. ❍ Yes, we partially track the number of our service-provider engagements. ❍ We do not track.
LEA 08.2	Additional information. [OPTIONAL]	
	[1000 words]	

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LEA 08	EXPLANATORY NOTES
LEA 08	The indicator [LEA 08.108is aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations.
LEA 08.1	This indicator allows you to report whether you track the number of engagements conducted by your organisation and/or its service providers. You may be tracking your engagements but doing so partially (e.g., when engagements carried out by a dedicated ESG team are recorded but engagements by mainstream portfolio managers are not). If so, select "Yes, we partially track the number of our engagements."
LEA 08.2	This can include a discussion of: • the systems in place to track the progress of engagements; • a description of the information collected; • how regularly tracking systems are updated, and to whom this information is provided; and/or • any auditing procedures to ensure information recorded is accurate.
LOGIC	
LEA 08	[LEA 08.1] is applicable if you have engagements conducted by internal staff, in collaboration with other investors, or through service providers in [02.1]. If your organisation does not track or cannot provide partial information or reliable estimates on engagements, you will not see indicator [LEA 09], which asks you to provide information about the number of engagements. However, you will still be able to provide examples of your engagements later in this section [LEA 11]. [LEA 09] will be applicable if you reported that you track the number of your engagement activities in [LEA 08.1] (any of individual/internal, collaborative or service provider).

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OUTPUTS AND OUTCOMES

LEA 09	Indicator status MANDATORY TO REPORT, VOLUNTARY TO DISCLOSE	Purpose CORE ASSESSED	Principle PRI 2

LEA 09	INDICATOR			
LEA 09.1	Indicate the proportion of companies in your listed equities portfolio with which your organisation engaged during the reporting year.			
		Number of companies engaged	**Proportion of companies engaged with, out of total listed equities portfolio**	
	Individual/Internal staff engagements			❍ We did not conduct any engagements in the reporting year.
	Collaborative engagements			❍ We did not conduct any engagements in the reporting year.
	Service-provider engagements			❍ We did not conduct any engagements in the reporting year.

LEA 09.2	Indicate the breakdown of engagements conducted within the reporting year by the number of interactions (including interactions made on your behalf).)	
	No. of interactions with a company	**% of engagements**
	One interaction	❍ >76% ❍ 51-75% ❍ 11-50% ❍ 1-10% ❍ None
	2 to 3 interactions	❍ >76% ❍ 51-75% ❍ 11-50% ❍ 1-10% ❍ None
	More than 3 interactions	❍ >76% ❍ 51-75% ❍ 11-50% ❍ 1-10% ❍ None
	Total	**100%**
LEA 09.3	Indicate the percentage of your collaborative engagements in which you were the leading organisation during the reporting year.	
		% leading role
	Collaborative engagements	❍ >50% ❍ 10-50% ❍ <10% ❍ None
LEA 09.4	Indicate the percentage of your service-provider engagements in which you had some involvement during the reporting year.	
		% of engagements with some involvement
	Service-provider engagements	❍ >50% ❍ 10-50% ❍ <10% ❍ None
LEA 09.5	Additional information [OPTIONAL]	

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	[1000 words]

LEA 09	EXPLANATORY NOTES
LEA 09	The indicator [LEA 09.1] is aligned with the ICGN Global Stewardship Principles.
LEA 09.1	This sub-indicator allows you to report the number and comprehensiveness of your engagements in the reporting year. Do not list engagement activities in which you did not have any interactions with the company in the reporting year. *Number of companies engaged* Please record the total number of **companies** with which you engaged in the reporting year, irrespective of the number of issues on which you engaged. *Engagements* Please record either: the percentage of companies engaged with as a proportion of the total number of companies you hold; or the proportion of the assets covered by the engagements out of your total listed equities holdings. *Avoid double counting* Make sure you list your engagements only in one of the three categories, based on the definitions provided. Do not count the same case of engagement with a company in more than one category. If you contract more than one service provider to conduct engagements with the same companies for the same issues, do not double count the number of companies engaged on your behalf (although a +/- 5% estimation of the overlap may be applied). *Do not include the following as engagements here:* • standard questionnaires sent to companies for the purpose of information gathering only (e.g., on products or ESG policies and performance for screening purposes); • attendance without interactions/discussion at a company presentation, AGM or other company meeting; • interactions intended to influence public policy or bodies that define industry best practices (these fall under the SGSG module); • CDP's disclosure requests on GHG emissions, water and forests (these are not captured as engagements but are reported in SG).SG You can, however, include your engagement with CDP engagement programmes, such as Carbon Action or Aiming for A; and/or • press releases or investor statements which an investor may publish in relation to an engagement with a company.
LEA 09.2	This indicator attempts to provide an understanding of the degree of comprehensiveness of an engagement. A greater number of interactions is considered to be indicative of a higher quality of engagement. The PRI recognises that this measurement alone cannot fully assess the quality of investors' engagements. Each organisation's context is different, and the LEA module therefore provides multiple indicator questions where signatories can detail their full approach. An interaction can be one of the following: letters and/or emails to companies, meetings and/or calls with the company's board/senior management, or with CSR, IR, or other management, visits to operations, visits to supplier(s) in the company's supply chain, etc.
LEA 09.3	This indicator attempts to provide an understanding of the level of involvement you had in your collaborative engagements. If you were highly involved (, for example by, drafting letters, emails, other correspondence, attending meetings, directly contacting the company(ies) concerned, representing the collaborative engagement etc.), it would be considered that you took a leading role.

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LEA 09.4	Partial involvement in your service-provider engagements can include: - defining the ESG issues to be raised, and the objectives to be achieved, with specific companies; - drafting joint letters to specific companies; - attending joint meetings and following-up on specific companies.
LOGIC	
LEA 09	[LEA 09] will be applicable if you reported that you track the number of your engagement activities in [LEA 08.1] (any of individual/internal, collaborative or service provider). Where "We did not complete any engagements in the reporting year" for an engagement type, the following indicators will not be relevant; • Individual / Internal Staff Engagements: [LEA 9.2] will be applicable • Collaborative Engagements: [LEA 09.2] and [LEA 09.3] will be applicable • Service Provider Engagements: [LEA 09.2] and [LEA 09.4] will be applicable.
ASSESSMENT	
LEA 09	Maximum score: Nine ★ The assessment of this indicator is based on your responses to [LEA 09.1–09.4]. It is possible to receive a full score regardless of who conducts the engagements. The assessment takes into account the proportion of companies you engaged with [LEA 09.1], the number of interactions these engagements involved [LEA 09.2], and your level of involvement [LEA 09.3 and 09.4].
	Indicator scoring methodology
	Part 1: Proportion of companies engaged out of all listed equity companies held [LEA 09.1]. The percentage provided will be used directly within the algorithm provided below. **Part 2: Number of interactions [LEA 09.2]** The number of interactions most frequently used, as reported in LEA 09.2, will identify the multiplier to be used (as per the multiplier table) in the algorithm provided below. Note that if two or more differing interaction selections are of equal proportion, then the highest interaction option will be used to identify the denominator. **Part 3: Level of involvement [LEA 09.3 - 09.4]** The percentages selected in LEA 09.3 (for collaborative engagements) and LEA 09.4 (for service- provider engagements) will identify the multiplier to be used (as per the multiplier table) in the algorithm provided below. Note that for individual engagements, for assessment purposes, the level of involvement is automatically considered to be 100%. **Working example** • *Responses / characteristics* Example organisation AUM size – USD*11 billion* [LEA 09.1] Collaborative engagements – Proportion of companies engaged out of total listed equity companies —— *50%* [LEA 09.2] One interaction - *11-50%* Two to three interactions - *51-75%* Three or more interactions - *11-50%* [LEA 09.3] Collaborative engagements % leading role – *>50%* • *Denominators* [LEA 09.1] reported percentage is changed into a decimal point, thus 50% becomes 0.5;

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[LEA 09.2] as "'Two to three interactions" was the number of interactions most frequently used across engagements, the denominator linked to "'Two to three interactions" is '1.55' (as per below multiplier table);

[LEA 09.3] reported 50% of engagements in which the organisation had a leading role. The denominator linked to this response (as per below multiplier table) is '2'.

- *Method*

X = (0.5 x 1.5) x 2

X = 1.5

- *Result*

This figure is used to determine the overall mark for collaborative engagements in the scoring matrix below. Note that the organisation's total AUM size (AUM column) determines the scoring categories.

As the example organisation's AUM size is >10 bn, the score awarded is **5 ★**.

Algorithm

X = Proportion of companies **(%) x** Number of interactions multiplier **x** Level of involvement multiplier

Multiplier table

	0	**x 1**	**x 1.5**	**x 2**
Number of interactions		1 interaction	2–3 interactions	More than 3 interactions
Level of involvement	"None" option	"<10%" option	"'10-50%" option	">50%" option

The resulting figure is then converted to stars using the values shown below

AUM Size (USD)	**> 10 bn**	**5 – 9.99 bn**	**1 – 4.99 bn**	**0.1 – 0.99bn**	**0 – 0.1bn**	**Score**
Score	0	0	0	0	0	⭘
	>0.01	>0.01	>0.01	>0.01	>0.01	1★
	>0.39	>0.69	>0.57	>0.57	>0.3	2★
	>0.75	>0.99	>0.87	>0.87	>0.6	3★
	>1.05	>1.29	>1.17	>1.17	>0.9	4★
	>1.35	>1.59	>1.47	>1.47	>1.2	5★
	>1.65	>1.89	>1.77	>1.77	>1.5	6★
	>1.98	>2.19	>2.07	>2.07	>1.8	7★
	>2.34	>2.49	>2.37	>2.37	>2.1	8★
	>2.70	>2.79	>2.67	>2.67	>2.4	9★

LEA 09	**DEFINITIONS**
LEA 09	For definitions of engagements, who conducts them, intensity and effort, please refer to the Main Definitions document.

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PRI Principles for Responsible Investment

LEA 10	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PRI 2

LEA 10	INDICATOR	
LEA 10.1	Indicate which of the following your engagement involved.	
	❍ Letters and emails to the companies	❍ In a minority of cases ❍ In a majority of cases ❍ In all the cases
	❍ Meetings and/or calls with board/senior management	❍ In a minority of cases ❍ In a majority of cases ❍ In all the cases
	❍ Meetings and/or calls with the CSR, IR or other management	❍ In a minority of cases ❍ In a majority of cases ❍ In all the cases
	❍ Visits to operations	❍ In a minority of cases ❍ In a majority of cases ❍ In all the cases
	❍ Visits to supplier(s) in supplier(s) from the company's supply chain	❍ In a minority of cases ❍ In a majority of cases ❍ In all the cases
	❍ Participation in roadshows	❍ In a minority of cases ❍ In a majority of cases ❍ In all the cases
	❍ Other (specify) _____	❍ In a minority of cases ❍ In a majority of cases ❍ In all the cases
LEA 10.2	Additional information. [OPTIONAL]	
	[1000 words]	

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LEA 10	EXPLANATORY NOTES
LEA 10.1	This indicator allows you to report on the action you take as part of your engagements, and the frequency with which you undertake such action.
LEA 10.2	This can include a discussion of: • how you decide which action to take (e.g., depending on the size of a holding or the severity/materiality of the issue); • whether there is an escalation process that triggers different action; and/or • examples of positive engagement/dialogue based on one or a combination of actions listed above.

ASSESSMENT

LEA 10	Maximum score: three ★ The assessment of this indicator is based on your responses to [10.1].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	No engagement types or only types in "a 'minority of cases".	○	
	One type selected in "a 'majority of cases" or "'all the cases".	★	
	Two types selected in "a 'majority of cases" or in "'all the cases".	★★	
	Three types or more selected in "a 'majority of cases" or in "'all the cases.	★★★	

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LEA 11	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle PRI 2

LEA 11	INDICATOR				
LEA 11.1	Provide examples of the engagements that your organisation or your service provider carried out during the reporting year.				
	ESG Topic	**Conducted by**	**Objectives**	**Scope and Process**	**Outcomes**
	Drop down: • Executive Remuneration • Climate change • Human rights • Company leadership issues • Pollution • General ESG • Diversity • Shareholder rights • Health and safety • Sustainability reporting • Water risks • Labour practices and supply chain management • Anti-bribery and corruption • Deforestation • Aggressive tax planning • Cyber security • Other governance • Plastics • Other • Multiple	Drop down: • Individual/ Internal • Collaborative • Service provider	[200 words]	[200 words]	Drop down: • Company changed practice • Company committed to change • Disclosure/ / report published • Divestment • Failed/no outcome • Increased understanding/ / information • Invested in company • On-going • Voting • Other
	[same as above]	[same as above]	[same as above]	[same as above]	[same as above]
	[same as above]	[same as above]	[same as above]	[same as above]	[same as above]
	[same as above]	[same as above]	[same as above]	[same as above]	[same as above]
	[same as above]	[same as above]	[same as above]	[same as above]	[same as above]
LEA 11.2	Additional information				
	[1000 words]				

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LEA 11	EXPLANATORY NOTES
LEA 11	The indicator [LEA 11.1] is aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations.
LEA 11.1	*Number of examples* We suggest that you provide at least three examples. As far as is practicable, examples should be chosen to provide a rounded picture of your engagement activities, covering the range of topics on which you engaged. Examples can be focused on a theme, or they may be engagements with a specific company. You might want to provide examples of engagements that concluded and achieved positive results, as well as on-going engagements on ESG issues that are a priority for your organisation. *ESG topic* Select the specific ESG topic of the engagement. If the relevant topic is not available, please select "Other" and specify in the Scope and Process column. *Conducted by* Clarify who was the main driver in the engagement: you directly, your organisation through a collaboration or a service provider. *Objectives* Specify the goals and/or motivations for the engagement. *Scope and Process* You may wish to comment on the number of companies with which you engaged on the issue in question, their relative size in terms of the percentage of your portfolio or total AUM, your approach to the engagement (e.g., letters, face-to-face meetings) and relative engagement strategies (e.g., private dialogue, linkage with proxy voting decisions etc.) *Outcomes* Select the outcome of the engagement. If the relevant outcome is not available, please select "Other" and specify in the Scope and Process column.

Examples					
ESG factor	**ESG issue**	**Conducted by**	**Objectives**	**Scope and Process**	**Outcomes**
Select from the drop down menu the most applicable E, S or G theme, or multiple.	Use of uncertified Indonesian wood in paper manufacturing, presenting a significant risk to companies' reputation	Internal staff	Company commitment to sourcing only from certified forests	We engaged with 15 companies. They represent 18% (by number) of the companies in our portfolio which we believe may be exposed to this risk. We conducted numerous meetings with all the companies, including with Directors serving on the Board.	Seven of the companies contacted have agreed to change their purchasing practices, and two of these have issued new policy statements on this issue. Our holdings in some of these companies have increased as a result of the engagement.

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	Corporate governance	Internal staff	Split Chairman and CEO roles	We met with 6 US-listed companies that currently have a combined Chairman/CEO . This represents x% of the US companies we hold that have a joint Chairman/CEO .	We are awaiting formal responses to our proposals from these companies.

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SECTION

(Proxy) voting and shareholder resolutions

LEA 12	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle PRI 2

LEA 12	INDICATOR	
LEA 12.1	Indicate how you typically make your (proxy) voting decisions.	
	Approach	**Based on**
	❍ We use our own research or voting team and make voting decisions without the use of service providers.	❍ Our own voting policy ❍ Our clients' requests or policies ❍ Other (explain) _____
	❍ We hire service providers who make voting recommendations and/or provide research that we use to guide our voting decisions.	❍ The service-provider voting policy we sign off on ❍ Our own voting policy ❍ Our clients' requests or policies ❍ Other (explain) _____
	❍ We hire service providers who make voting decisions on our behalf, except in some pre-defined scenarios where we review and make voting decisions.	❍ The service-provider voting policy we sign off on ❍ Our own voting policy ❍ Our clients' requests or policies ❍ Other (explain) _____
	❍ We hire service providers who make voting decisions on our behalf.	❍ The service-provider voting policy we sign off on ❍ Our own voting policy ❍ Our clients' requests or policies ❍ Other (explain) _____
LEA 12.2	Provide an overview of how you ensure that your agreed-upon voting policy is adhered to, giving details of your approach when exceptions to the policy are made.	
	[1000 words]	
LEA 12.3	Additional information. [OPTIONAL]	
	[1000 words]	

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LEA 12	EXPLANATORY NOTES
LEA 12	The indicator [LEA 12.1] is aligned with the ICGN Global Stewardship Principles.
LEA 12.1	If you select the latter two responses, combined with "our own voting policy," the word "decisions" implies that your service provider is implementing your voting policy and framework. If you select "Other," this will affect the peer group to which you are allocated. If you base your voting decisions partly on a policy developed in-house and partly on your service provider's or a client's policy, please indicate which is the most significant factor in the majority of cases.
LEA 12.2	This can include a discussion of: • examples when your organisation voted not in accordance with your agreed-upon voting policy; • how your organisation monitors whether selected service provider(s) have made voting decisions in accordance with your agreed-upon voting policy.
LEA 12.3	This can include a discussion of: • who is involved in making final voting decisions internally (e.g., ESG/proxy voting dedicated team, and/or portfolio managers); • criteria used to review a service provider's recommendations; • situations in which there is more than one decision maker (e.g., if you delegate all voting decisions on corporate governance matters to a service provider, but you make all voting decisions on environmental and social issues internally); • situations in which decisions may be made jointly.
LOGIC	
LEA 12.2	[LEA 12.2] is triggered if '(Proxy) voting approach' is selected in [LEA 01.3].

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LEA 13	Indicator status MANDATORY	Purpose ADDITIONALLY ASSESSED	Principle PRI 2

LEA 13	INDICATOR
LEA 13.1	Of the voting recommendations that your service provider made in the reporting year, indicate the percentage that was reviewed by your organisation, giving the reasons.
	Percentage of voting recommendations your organisation reviewed
	❍ 100-75%, ❍ 74-50%, ❍ 49-25%, ❍ 24-1%, ❍ None
	Reasons for review
	❑ Specific environmental and/or social issues ❑ Votes concerning significant holdings ❑ Votes against management and/or abstentions ❑ Conflicts of interest ❑ Corporate action, such as M&As, disposals, etc. ❑ Votes concerning companies with which we have an active engagement ❑ Client requests ❑ Ad-hoc oversight of service provider ❑ Shareholder resolutions ❑ Share blocked securities ❑ Other (explain) _____
LEA 13.2	Additional information. [OPTIONAL]
	[1000 words]

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LEA 13	EXPLANATORY NOTES		
LEA 13	The indicator [LEA 13.1] is aligned with the ICGN Global Stewardship Principles.		
LEA 13	The purpose of this indicator is to allow you, if in some situations you review your service provider's recommendations, to explain the level and nature of your involvement.		
LOGIC			
LEA 13	[LEA 13.1] is applicable if you select in [LEA 12.1] "We hire service providers who make voting decisions on our behalf, except in some pre-defined scenarios where we review and make voting decisions."		
ASSESSMENT			
LEA 13.1	Maximum score: Three ★		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	None	○	
	24-1%	★	
	49-25%	★★	
	More than 50%	★★★	

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LEA 14	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PRI 2

LEA 14	INDICATOR	
LEA 14.1	Does your organisation have a securities lending programme?	
	❍ Yes	❍ No
LEA 14.2	Describe why your organisation does not lend securities.	
	[500 words]	
LEA 14.3	Indicate how the issue of voting is addressed in your securities lending programme.	
	❍ We recall all securities for voting on all ballot items ❍ We maintain some holdings, so that we can vote at any time ❍ We systematically recall some securities so that we can vote on their ballot items (e.g., in line with specific criteria) ❍ We recall some securities so that we can vote on their ballot items on an ad-hoc basis ❍ We empower our securities-lending agent to decide when to recall securities for voting purposes ❍ We do not recall our securities for voting purposes ❍ Other (specify) _____	
LEA 14.4	Additional information. [OPTIONAL]	
	[1000 words]	

LEA 14	EXPLANATORY NOTES		
LEA 14	The indicator [LEA 14.1] is aligned with the ICGN Global Stewardship Principles.		
LEA 14.3	If you recall shares on the basis of specific criteria, please explain these criteria, including any ESG issues which they address. If you occasionally recall shares, please explain the circumstances under which you do this.		
LOGIC			
LEA 14	[LEA 14.2] is applicable if you report “No” in [LEA 14.1]. [LEA 14.3] is applicable if you report “Yes” in [LEA 14.1].		
ASSESSMENT			
LEA 14	Maximum score: Three ★ The assessment of this indicator is based on your responses to [14.1] and [14.3].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**

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	"No" in [14.1].	N/A	You are not assessed on this indicator.
	"Yes" in [14.1] AND "We do not recall our shares for voting purposes" in [14.3].	⚬	
	"Yes" in [14.1] AND 'We recall some securities so that we can vote on their ballot items on an ad-hoc basis' in [14.3] OR "Yes" in [14.1] AND "We empower our securities-lending agent to decide when to recall securities for voting purposes" in [14.3].	★	
	"Yes" in [14.1] AND "We systematically recall some securities so that we can vote on their ballot items (e.g., in line with specific criteria)"' or "'We maintain some holdings, so that we can vote at any time" in [14.3].	★★	
	"Yes" in [14.1] AND "We recall all securities for voting on all ballot items" in [14.3].	★★★	

LEA 14	DEFINITION
Securities lending programme	A transaction in which the beneficial owner of the securities, normally a large institutional investor (such as a pension fund or mutual fund), agrees to lend its securities to a borrower (such as a hedge fund) in exchange for collateral consisting of cash and/or government securities.

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LEA 15	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle PRI 2

LEA 15	INDICATOR
LEA 15.1	Indicate the proportion of votes participated in within the reporting year in which where you or the service providers acting on your behalf raised concerns with companies ahead of voting. ❍ 100% ❍ 99-75% ❍ 74-50% ❍ 49-25% ❍ 24-1% ❍ Neither we nor our service provider(s) raise concerns with companies ahead of voting
LEA 15.2	Indicate the reasons for raising your concerns with these companies ahead of voting. ❑ Vote(s) concerned selected markets ❑ Vote(s) concerned selected sectors ❑ Vote(s) concerned certain ESG issues ❑ Vote(s) concerned companies exposed to controversy on specific ESG issues ❑ Vote(s) concerned significant shareholdings ❑ Client request ❑ Other; explain _____
LEA 15.3	Additional information. [OPTIONAL] [1000 words]

LEA 15	EXPLANATORY NOTES
LEA 15	The indicator [LEA 15.1] is aligned with the ICGN Global Stewardship Principles.
LEA 15.3	This can include a discussion of: • the process by which you would raise concerns with companies ahead of voting.
LOGIC	
LEA 15	[LEA 15.2] is applicable if an option is between 1-99% is reported in [LEA 15.1].

LEA 15	DEFINITION
Significant shareholding	What exactly qualifies as a significant shareholding is based on your policies, but typically holdings above 1% of a company's total shares outstanding (by number) are considered significant.

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LEA 16	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 2

LEA 16	INDICATOR	
LEA 16.1	Indicate the proportion of votes participated in within the reporting year in which, you and/or the service provider(s) acting on your behalf, have communicated to companies the rationale for abstaining or voting against management recommendations.	
	❍ 100% ❍ 99–-75% ❍ 74–-50% ❍ 49–-25% ❍ 24–-1% ❍ We do not communicate the rationale to companies ❍ Not applicable because we and/or our service providers do not abstain or vote against management recommendations	
LEA 16.2	Indicate the reasons why your organisation would communicate to companies, the rationale for abstaining or voting against management recommendations.	
	❑ Vote(s) concern selected markets ❑ Vote(s) concern selected sectors ❑ Vote(s) concern certain ESG issues ❑ Vote(s) concern companies exposed to controversy on specific ESG issues ❑ Vote(s) concern significant shareholdings ❑ Client request ❑ Other; explain _____	
LEA 16.3	In cases where your organisation does communicate the rationale for abstaining or voting against management recommendations, indicate whether this rationale is made public.	
	❍ Yes	❍ No
LEA 16.4	Additional information. [OPTIONAL]	
	[1000 words]	

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LEA 16	EXPLANATORY NOTES
LEA 16.4	This can include a discussion of: • the criteria according to which you would communicate the rationale to companies following a vote; • the criteria according to which you make public your voting decisions.
LOGIC	
LEA 16	[LEA 16.2] is applicable if an option between 1-99% is reported in [LEA 16.1]. [LEA 16.3] is applicable if an option between 1-100% is reported in [LEA 16.1].
ASSESSMENT	
LEA 16	Maximum score: Three ★ The assessment of this indicator is based on your responses to [16.1].

Indicator scoring methodology

Selected response	Level score	Further Details
Not applicable because we and/or our service providers do not abstain or vote against management recommendations	N/A	
We do not communicate the rationale to companies	⭘	
Less than 50%	★	
74–50%	★★	
More than 75%	★★★	

LEA 16	DEFINITIONS
Significant shareholding	What exactly qualifies as a significant shareholding is based on your policies, but typically, holdings above 1% of a company's total shares outstanding (by number) are considered significant.

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LEA 17	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 2

LEA 17	INDICATOR	
LEA 17.1	For listed equities in which you or your service provider have the mandate to issue (proxy) voting instructions, indicate the percentage of votes cast during the reporting year.	
	Votes cast (to the nearest 1%)	**Specify the basis on which this percentage is calculated.**
	☐ %	❍ Of the total number of ballot items on which you could have issued instructions ❍ Of the total number of company meetings at which you could have voted ❍ Of the total value of your listed equity holdings on which you could have voted
	❑ We do not track or collect this information.	
LEA 17.2	Explain your reason(s) for not voting on certain holdings: ❑ Shares were blocked ❑ Notice, ballots or materials not received on time ❑ Missed deadline ❑ Geographical restrictions (non-home market) ❑ Cost ❑ Conflicts of interest ❑ Holdings deemed too small ❑ Administrative impediments (e.g., power of attorney requirements, ineligibility due to participation in share placement) ❑ Client request ❑ Other (explain) _____	
LEA 17.3	Additional information. [OPTIONAL] [1000 words]	

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LEA 17	EXPLANATORY NOTES
LEA 17.1	*For investment managers* When calculating the percentage of votes cast, please include only those holdings for which you have a client mandate to vote. If you do not have a mandate, do not include those holdings. *For asset owners* When calculating the percentages of votes cast, please include only those holdings for which you or your service providers have the mandate to vote. If you have given your investment manager the mandate to vote on your behalf on part of your holdings, do not include those holdings in the numerator or denominator of this ratio.
LOGIC	
LEA 17	[LEA 17.2] is applicable if you report the percentage of votes cast as less than 100% in [LEA 17.1].
ASSESSMENT	
LEA 17	Maximum score: Three ★ The assessment of this indicator is based on the percentage reported in [17.1].

Indicator scoring methodology

Selected response	Level score	Further Details
"We do not track or collect this information" OR <30%	○	
30–80%	★	
81–95%	★★	
>95%	★★★	

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LEA 18	Indicator status VOLUNTARY	Purpose ADDITIONALLY ASSESSED	Principle PRI 2

LEA 18	INDICATOR	
LEA 18.1	Indicate whether you track the voting instructions that you or your service provider on your behalf have issued.	
	❍ Yes, we track this information.	❍ No, we do not track this information.
LEA 18.2	Of the voting instructions that you and/or third parties on your behalf have issued, indicate the proportion of ballot items that were:	
	Voting instructions	**Breakdown as percentage of votes cast**
	For (supporting) management recommendations	%
	Against (opposing) management recommendations	%
	Abstentions	%
	Total	**100%**
LEA 18.3	In cases where your organisation voted against management recommendations, indicate the percentage of companies which you have engaged.	
	%	
LEA 18.4	Additional information.	
	[1000 words]	

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LEA 18	EXPLANATORY NOTES
LEA 18	The indicator [LEA 18.1] is aligned with the ICGN Global Stewardship Principles.
LEA 18.3	You may wish to discuss: • how the decision to vote against management is part of your engagement programme • how you communicate with affected companies before and after the vote • how you monitor a company's reaction and eventual changes to internal ESG ratings • how you communicate internally about the vote (e.g., to portfolio managers)
LOGIC	
LEA 18	[LEA 18.2] is applicable if you report "Yes, we track this information" in [LEA 18.1]. [LEA 18.3] is applicable if you report an amount above 0% in 'Against management recommendations' in [LEA 18.2].
ASSESSMENT	
LEA 18	Maximum score: Three ★ The assessment of this indicator is based on the percentage reported in [18.1].

Indicator scoring methodology		
Selected response	**Level score**	**Further Details**
"No, we do not track this information."	⭘	
"Yes, we track this information."	★★★	

LEA 1818	DEFINITION
Abstentions	Under some voting systems, shareholders are only given the option to vote 'for' a resolution, or to 'withhold' their support (e.g., for a director election). For the purpose of this indicator, 'withhold' votes that have the effect of a vote opposing the recommendation should be included under 'against' management recommendations.

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LEA 19	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 2

LEA 19	INDICATOR	
LEA 19.1	Indicate whether your organisation has a formal escalation strategy following unsuccessful voting.	
	❍ Yes	❍ No
LEA 19.2	Indicate the escalation strategies used at your organisation following abstentions and/or votes against management. ❑ Contacting the company's board ❑ Contacting the company's senior management ❑ Issuing a public statement explaining the rationale ❑ Initiating individual/collaborative engagement ❑ Directing service providers to engage ❑ Reducing exposure (holdings) / divestment ❑ Other (; specify) _____	
LEA 19.3	Additional information. [OPTIONAL]	
	[1000 words]	

LEA 19	EXPLANATORY NOTES	
LEA 19.1	This indicator considers unsuccessful voting as a situation in which the desired outcome of your organisation's voting is not achieved.	
LEA 19.3	This indicator gives organisations the ability to outline their strategy in circumstances where voting was unsuccessful, and/or the desired outcome was not achieved.	
LOGIC		
LEA 19	[LEA 19.2] is applicable if "Yes" is reported in [LEA 19.1].	
ASSESSMENT		
LEA 19	Maximum score: Three ★ The assessment of this indicator is based on the percentage reported in [19.1] and [19.2].	
	Indicator scoring methodology	
	Selected response	**Level score**
	"No" in LEA 19.1.	⭘
	"Yes" in LEA 19.1 and one option in LEA 19.2.	★
	"Yes" in LEA 19.1 and two options in LEA 19.2.	★★
	"Yes" in LEA 19.1 and at least three options in LEA 19.2.	★★★

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LEA 20	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle PRI 2

LEA 20	INDICATOR	
LEA 20.1	Indicate whether your organisation, directly or through a service provider, filed or co-filed any ESG shareholder resolutions during the reporting year.	
	❍ Yes	❍ No
LEA 20.2	Indicate the number of ESG shareholder resolutions you filed or co-filed.	
	Total number	
LEA 20.3	Indicate what percentage of these ESG shareholder resolutions resulted in the following:	
	Went to vote	%
	Were withdrawn due to changes at the company and/or negotiations with the company	%
	Were withdrawn for other reasons	%
	Were rejected/not acknowledged by the company	%
	Total	**100%**
LEA 20.4	Of the ESG shareholder resolutions that you filed or co-filed and that were put to a vote (i.e., not withdrawn), indicate the percentage that received approval:	
	>50%;	
	50–20%;	
	<20%.	
LEA 20.5	Describe the ESG shareholder resolutions that you filed or co-filed, and the outcomes achieved.	
	[200 words]	
LEA 20.6	Describe whether your organisation reviews ESG shareholder resolutions filed by other investors.	
	[200 words]	
LEA 20.7	Additional information.	
	[1000 words]	

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LEA 20	EXPLANATORY NOTES
LEA 20	This indicator is intended to capture both the number and nature of ESG shareholder resolutions that you filed or co-filed, and the outcomes of any engagement associated with the filing of resolutions.
LEA 20.5	Your description of the ESG shareholder resolutions can include: • the rationale for filing these resolutions, including the relationship with your current engagement programme; • the process undertaken to generate the support required to submit the resolution; • the subject(s) of the resolution(s); • the markets in which they were filed; • why some resolutions were withdrawn; • whether company management changed its approach to address your concerns, or other outcomes that resulted.
LEA 20.6	You may wish to discuss: • the criteria which you or your service providers consider to support an ESG shareholder resolution; • whether you internally review all or some of the ESG resolutions filed; • whether you outsource entirely the review process to your service provider(s).
LOGIC	
LEA 20	[LEA 20.2] will be applicable if you select “Yes” in [LEA 20.1]. [LEA 20.3, LEA 20.4 and LEA 20.5] will be applicable if you report more than zero ESG shareholder resolutions in [LEA 20.2].

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LEA 21	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle PRI 2

LEA 21	INDICATOR				
LEA 21.1	Provide examples of the (proxy) voting activities that your organisation and/or service provider carried out during the reporting year.				
	ESG Topic	**Conducted by**	**Objectives**	**Scope and Process**	**Outcomes**
	Drop down: • Executive remuneration • Climate change • Human rights • Company leadership issues • Pollution • General ESG • Diversity • Shareholder rights • Health and safety • Sustainability reporting • Water risks • Labour practices and supply chain management • Anti-bribery and corruption • Deforestation • Aggressive tax planning • Cyber security • Political spending / lobbying • Other governance • Plastics • Other Multiple	Drop down: • Individual /Internal • Service provider	[200 words]	[200 words]	Drop down: • Company changed practice • Company committed to change • Disclosure/ / report published • Divestment • Failed/no outcome • Increased understanding/ / information • Invested in company • On-going • Voting • Other
	[same as above]	[same as above]	[same as above]	[same as above]	[same as above]
	[same as above]	[same as above]	[same as above]	[same as above]	[same as above]
	[same as above]	[same as above]	[same as above]	[same as above]	[same as above]
	[same as above]	[same as above]	[same as above]	[same as above]	[same as above]
LEA 21.2	Additional information				
	[1000 words]				

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Examples				
ESG topic	**Conducted by**	**Objectives**	**Scope and Process**	**Outcomes**
Select from drop down menu the most applicable E, S or G topic.	Internal staff	To ensure that executive remuneration is aligned with shareholder interests	We focused on AIM-listed companies held in our small cap funds (a total of approximately 25 companies) and decided to vote against 8 remuneration packages.	Following these votes, two companies engaged with us (see engagement section of this report) on how they can ensure that their remuneration practices are supported by investors, and they undertook to make changes prior to next year's AGM.

LEA 21	**EXPLANATORY NOTES**
LEA 21	*Number of examples* The number of examples that you provide will depend on how you structure your voting activities. We suggest that you provide at least three and up to 10 examples. As far as is practicable, these examples should be chosen to provide a rounded picture of your organisation's voting activities. *ESG topic* Specify the E, S and/or G topic. *Decision made by* Select whether the voting decision was made internally (e.g., dedicated ESG/proxy voting team or portfolio manager) or by a service provider. *Objectives* Describe the voting outcome you expected, and any underlying motivations for voting in this way. *Scope and process* For example, you might indicate whether (before or after the vote) the company was informed of your voting decision, how the decision was taken, the relationship with your engagement programme, the number of companies the voting topic applied to, and the AUM they represent. *Outcomes* Describe the changes, if any, in corporate practice that resulted from the voting decision.

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PRI REPORTING FRAMEWORK 2019
Direct — Fixed Income

November 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 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), the purpose of the indicator and the PRI Principle to which it relates.

	Indicator status	Purpose	Principle
xxx 01	*MANDATORY*	*CORE ASSESSED*	*PRI 2*

Indicator status

MANDATORY	Mandatory indicators reflect core practices. These responses will be made public and must be completed to submit the framework.
MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	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.
VOLUNTARY	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.
Peering	These indicators are used to determine your peer groups for assessment purposes.
Core assessed	These indicators form the core of the assessment and represent the majority of your final assessment score.
Additional assessed	These indicators represent more advanced or alternative practices and contribute to a smaller part of your score.
Descriptive	These are open-ended narrative indicators, allowing you to describe your activities.

Underneath the indicator

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

xxx 01	EXPLANATORY NOTES
xxx 01.1	This provides guidance on how to interpret the sub-indicators, including examples of what could be reported.
xxx 01.2	
LOGIC	
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.
ASSESSMENT	
xxx 01	This provides a brief overview of the pilot assessment approach for this indicator.

xxx 01	DEFINITIONS
xxx 01	Specific terms that are used in the indicator are defined here.

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PRI Principles for Responsible Investment

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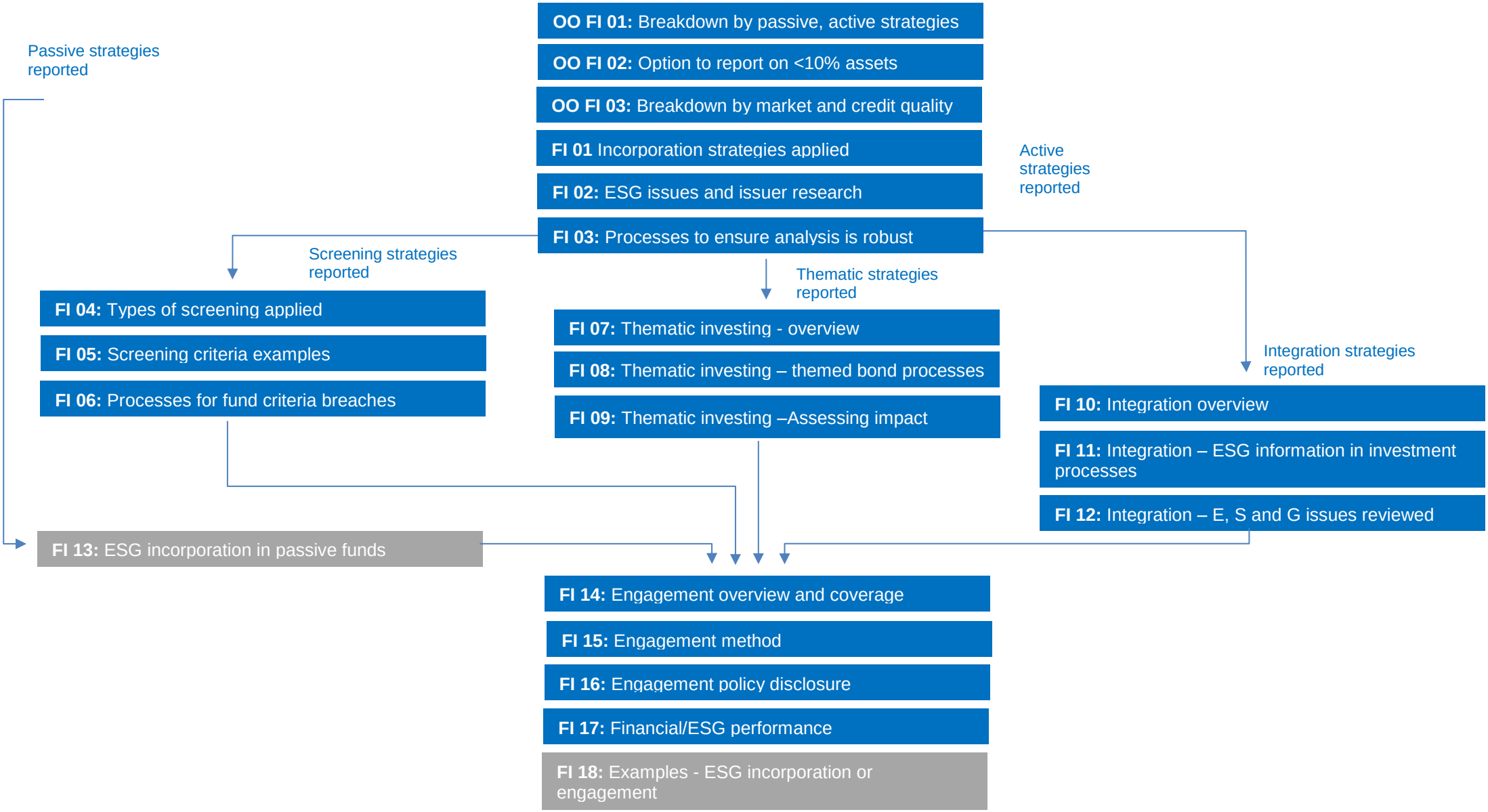
Pathways through the module



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Preface

The information reported in this module will enable your stakeholders to understand how your organisation applies RI in your internally managed fixed income holdings. RI refers to the incorporation of ESG factors into investment decisions, engagement and disclosure.

It is mandatory for all PRI signatories to complete this module if more than 10% of their assets under management (AUM) are directly invested in fixed income. This does not include cash and only involves investments made directly by your organisation without engaging an external investment manager.

If your fixed income investments are constrained in any way that limits your ability to apply a RI approach, you should explain this in the relevant free text indicators. For example, local regulations may restrict investments in foreign denominated or issued bonds.

For the purposes of this reporting module, we divide fixed income securities into four key categories: Sovereign, Supranational and Agency (SSA), Corporate (financial), Corporate (non-financial) and Securitised.

Further details are given below. Contact the PRI if you require further clarification.

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TAXONOMY OF FIXED INCOME SECURITIES

Reporting class	Type	Issuer	Detail
Fixed Income	SSA	Supranational organisations	Debt securities issued by supranational organisations such as multilateral development banks or international unions
		Sovereign states/governments	Debt securities issued by sovereigns (e.g., government bonds in any denomination)
		Government agencies	Debt securities issued by government agencies (e.g., government sponsored agency bonds, quasi-government agencies)
		Sub-national	Debt securities issued by sub-nationals such as states, municipalities and cities (e.g., muni bonds)
	Corporate (financial)	Financial services companies	Debt securities issued by financial services companies, including banks and insurers. (If your business also runs a banking arm, this does not include assets in your lending portfolio, such as deposits and loans.)
	Corporate (non-financial)	Corporations	Debt securities issued by public or private non-financial companies Includes senior or subordinated publicly listed debt, private debt or loans, project finance and infrastructure bonds
	Securitised	Banks, SPVs	Debt securities backed by asset pools and issued by special purpose vehicles Includes asset-backed securities, mortgage-backed securities, project finance, secured infrastructure debt, collateralised debt or loan obligations and covered bonds

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Background

The Fixed Income module has been developed to provide a comprehensive and forward looking set of indicators. In places, the indicators capture fairly advanced practices, practices PRI is expecting to become more common as signatories make progress as responsible investors in this asset class.

Summary of updates

The module has not changed significantly since 2016. Some minor amendments have been made to improve data quality or assessment. The guidance has also been clarified throughout.

2018 Indicator	Update summary
FI 03	Selection options have been removed/added. The assessment has been modified.
FI 05	This indicator has been deleted. All following indicators have been renumbered.
FI 06, FI 07, FI 14	The indicator has been renumbered. The assessment has been modified.
FI 08, FI 12	The indicator has been renumbered. Selection options have been modified.
FI 16	The indicator has been renumbered. Sub-indicator has been deleted. Selection options and assessment have been modified.

To view a detailed summary of changes to the module, please click here.

For any word limit in the module, please click here.

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SECTION

ESG incorporation in actively managed fixed income

IMPLEMENTATION PROCESSES

FI 01	Indicator status	Purpose	Principle
	MANDATORY	GATEWAY	PRI 1

FI 01	INDICATOR
FI 01.1	Indicate: • which ESG incorporation strategy and/or combination of strategies you apply to your actively managed fixed income investments; and • the proportion (+/- 5%) of your total actively managed fixed income investments each strategy applies to.

ESG incorporation strategy (select all that apply)	Percentage of active fixed income securities to which the strategy is applied (estimate +/- 5%)			
	SSA	Corporate (financial)	Corporate (non-financial)	Securitised
❑ Screening alone	____ %	____ %	____ %	____ %
❑ Thematic alone	____ %	____ %	____ %	____ %
❑ Integration alone	____ %	____ %	____ %	____ %
❑ Screening + integration strategies	____ %	____ %	____ %	____ %
❑ Thematic + integration strategies	____ %	____ %	____ %	____ %
❑ Screening + thematic strategies	____ %	____ %	____ %	____ %
❑ All three strategies combined	____ %	____ %	____ %	____ %
❑ No incorporation strategies applied	____ %	____ %	____ %	____ %
Total actively managed fixed income securities	**100%**	**100%**	**100%**	**100%**

FI 01.2	Describe your reasons for choosing a particular ESG incorporation strategy and how combinations of strategies are used.
FI 01.3	Additional information [OPTIONAL]

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FI 01	EXPLANATORY NOTES
FI 01.1	The indicator allows you to provide a broad overview of how your organisation takes into account ESG issues in fixed income investment. Please describe the activities, strategies and processes used. Subsequent indicators allow you to provide specific information about the coverage of these strategies and how they are implemented. This indicator may include a discussion of: • the main ESG strategies that you use, including the reasons for their use; • who is responsible for the implementation of these strategies; and/or • how your ESG strategies differ (e.g., in different geographies or sectors). If you apply two strategies to the same assets, please select the relevant combination options. For example, you may apply screening only for 5% of your assets, and for others, you may apply a combination of screening and integration. In these cases, you would report 'Screening alone' for 5% and 'Screening plus Integration strategies' for the remaining 95%. If you do not apply any incorporation approach and the option 'No incorporation strategies applied' accounts for 100% of your listed equity assets, you will not need to report further in the actively managed listed equity section of this module.
FI 01.2	You may like to explain why you have chosen a particular RI strategy to apply to a specific group of assets or to all fixed income investments. This might include an explanation of certain internal or external drivers. You may like to explain how your approach to ESG incorporation varies relative to different types of issuer. Your response may include a discussion of: • the different sources of ESG data and analysis across issuer types, • the variations in engagement approaches across issuer types, • how the depth of your ESG analysis varies across issuer types.
LOGIC	
FI 01	[FI 01] will only be applicable where 'Active' strategies are reported in "Organisational Overview" module [OO FI 01]. [FI 01.2] will not trigger where 'No incorporation strategies applied' for all fixed income investments outlined in [FI 01.1]. [FI 01.1] will trigger the following indicators, depending on whether you select the strategy stated: • 'Screening alone' will trigger the 'Implementation: Screening' section [FI 04 - FI 06]. • 'Thematic alone' will trigger the 'Implementation: Sustainability themed investing' section [FI 07 - FI 09]. • 'Integration alone' will trigger the 'Implementation: Integration of ESG issues' section [FI 10 - FI 12]. • 'Screening + Integration' will trigger [FI 04 - FI 06] and [FI 10 - FI 12] • 'Thematic + Integration' will trigger [FI 07 - FI 09] and [FI 10 - FI 12] • 'Screening + Thematic' will trigger [FI 04 - FI 06] and [FI 07 - FI 09] • 'All three strategies' will trigger [FI 04 - FI 12] • In addition, any of the above options will trigger [FI 02 and FI 03] • If you report 'No incorporation strategies applied' to 100% of your actively managed listed equities, indicators [FI 04 - FI 12] will not be applicable.

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FI 01	DEFINITIONS
Incorporation of ESG issues into investment analysis and decision-making processes is covered in Principle 1 of the PRI. Throughout the Reporting Framework, we refer to ESG incorporation as the review and use of ESG information in the investment decision-making process. The Reporting Framework addresses four ways in which ESG incorporation can be done: 1. screening 2. sustainability themed investment (also referred to as environmentally and socially themed investment) 3. integration 4. a combination of the above Assets subject to an engagement approach only and not subject to any of the above strategies should not be included in ESG incorporation.	
Screening of investments	The definitions of the three types of screening in the Reporting Framework are: a. negative/exclusionary screening: The exclusion from a fund or portfolio of certain sectors, companies or practices based on specific ESG criteria; b. positive/best-in-class screening: Investment in sectors, companies or projects selected for positive ESG performance relative to industry peers; or c. norms-based screening: Screening of investments against minimum standards of business practice based on international norms. Norms-based screening involves either: 1. defining the investment universe based on investees' performance on international norms related to RI/ESG issues; or 2. excluding investees from portfolios after investment if they are found following research, and sometimes engagement, to contravene these norms. Such norms include but are not limited to the UN Global Compact Principles, the Universal Declaration of Human Rights, International Labour Organization standards, the United Nations Convention Against Corruption and the OECD Guidelines for Multinational Enterprises.
Sustainability **themed** investment	Investment in themes or assets specifically related to sustainability (for example, clean energy, green technology or sustainable agriculture).
ESG integration	The explicit and systematic inclusion of ESG factors in investment analysis and investment decisions.
For further detail on these definitions, please see separate Main Definitions document.	

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FI 02	Indicator status MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	Purpose CORE ASSESSED	Principle PRI 1

FI 02	INDICATOR
FI 02.1	Indicate which ESG factors you systematically research as part of your analysis on issuers.

	SSA	Corporate (financial)	Corporate (non-financial)	Securitised
Environmental data	❑	❑	❑	❑
Social data	❑	❑	❑	❑
Governance data	❑	❑	❑	❑

FI 02.2 Indicate what format your ESG information comes in and where you typically source it.

Type of ESG information	Indicate who provides this information
❑ Raw ESG company data	❑ ESG research provider ❑ Sell-side ❑ In-house — specialised ESG analyst or team ❑ In-house — FI analyst, PM or risk team ❑ Other (specify)
❑ ESG factor specific analysis	❑ ESG research provider ❑ Sell-side ❑ In-house — specialised ESG analyst or team ❑ In-house — FI analyst, PM or risk team ❑ Other (specify)
❑ Issuer-level ESG analysis	❑ ESG research provider ❑ Sell-side ❑ In-house — specialised ESG analyst or team ❑ In-house — FI analyst, PM or risk team ❑ Other (specify)
❑ Sector-level ESG analysis	❑ ESG research provider ❑ Sell-side ❑ In-house — specialised ESG analyst or team ❑ In-house — FI analyst, PM or risk team ❑ Other (specify)
❑ Country-level ESG analysis	❑ ESG research provider ❑ Sell-side ❑ In-house — specialised ESG analyst or team ❑ In-house — FI analyst, PM or risk team ❑ Other (specify)

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FI 02.3	Provide a brief description of the ESG information used, highlighting any differences in sources of information across your ESG incorporation strategies.
FI 02.4	Additional information [OPTIONAL]

FI 02	**EXPLANATORY NOTES**
FI 02.2	The purpose of this indicator is to allow you to report what type of ESG information contributes to your investment decisions. It also gives you the opportunity to highlight the sources of this information. For example, some investors may use ESG data obtained from specialist research providers directly. Others may conduct their own in-house research (via specialised ESG teams or analysts and portfolio managers) to supplement research purchased from third parties and use this amended research in their investment process. Others may do both. Note that you will be able to describe the quality of this research and how it is used in your investment process in later indicators within this module. Explanation of different possible sources • Raw ESG company data: data on issuers' ESG performance as they publish it that has not been analysed or aggregated • ESG factor-specific ESG analysis or ratings: may be analysis of a single factor (e.g., human rights) or a trend or theme, such as climate change • Issuer and issue-level ESG analysis: analysis or aggregation of information on issuer and issue ESG performance, risks or opportunities. These may be represented as a rating percentage or another metric, for example, letters. • Issuer-level ESG analysis. Sector-level ESG analysis or ratings: analysis or aggregation of ESG performance, risks or opportunities related to a particular industry sector, such as the food and beverage sector, Country-related ESG analysis or ratings: analysis or aggregation of ESG laws, policies, norms, performance, risks or opportunities related to individual countries
FI 02.3	Describe here the sources of ESG information split by strategies. Also indicate if you typically use third-party ESG information as is in your investment process or if you typically conduct further in-house research to supplement the research provided by third parties.
FI 02.4	In this section you might also wish to describe what action you take to stimulate research. For example, you could describe if: • you identify ESG issues and suggest them research providers, or • you have a budget to pay for research on ESG issues.
LOGIC	
FI 02	[FI 02] will be applicable if you reported any ESG incorporation strategy (screening, thematic, or integration) in relation to your fixed income investments in [FI 01.1].
ASSESSMENT	
FI 02	Maximum score: Six ★ The assessment of this indicator is based on your responses to [02.1 & 02.2].
	Indicator scoring methodology

	Selected response	**Level score**	**Further Details**

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	FI 02.1		
	'No incorporation strategies applied ' in FI 02.	⭘	
	One type of ESG data	★	
	Two types of ESG data	★★	
	Three types of ESG data	★★★	
	FI 02.2		
	'No incorporation strategies applied ' in FI 02.	⭘	
	One type of ESG information	★	
	Two types of ESG information	★★	
	Three or more types of ESG information	★★★	

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FI 03	Indicator status MANDATORY	Purpose ADDITIONALLY ASSESSED	Principle PRI 1

FI 03	INDICATOR
FI 03.1	Indicate how you ensure that your ESG research process is robust. ❒ Comprehensive ESG research is undertaken internally to determine companies' activities; and products and/or services ❒ Issuers are given the opportunity by you or your research provider to review ESG research on them and to correct inaccuracies. ❒ Issuer information and/or ESG ratings are updated regularly to ensure ESG research is accurate. ❒ Internal audits and regular reviews of ESG research are undertaken in a systematic way. ❒ A materiality/sustainability framework is created and regularly updated that includes all the key ESG risks and opportunities for each sector/country. ❒ Other; specify_____ ❒ None of the above
F1 03.2	Describe how your ESG information or analysis is shared among your investment team. ❒ ESG information is held within a centralised database and is accessible to all investment staff ❒ ESG information is displayed on front office research platforms ❒ ESG information is a standard item on all individual issuer summaries, research notes, 'tear sheets', or similar documents ❒ Investment staff are required to discuss ESG information on issuers as a standard item during investment committee meetings ❒ Records capture how ESG information and research was incorporated into investment decisions ❒ Other; specify_____ ❒ None of the above
FI 03.3	Additional information [OPTIONAL]

FI 03	EXPLANATORY NOTES
FI 03.1	This indicator allows you to describe how you ensure the quality of the data used in your ESG analysis process. The indicator does not differentiate between ESG information produced internally and provided via research providers.
F1 03.2	This indicator allows you to show how ESG information is used by your fixed income teams.
FI 03.3	This is an opportunity to describe how you identify material ESG risks and opportunities, the framework you apply to your investable universe to review ESG issues, how you process raw data into rankings or how ESG analysis is weighted as part of your overall opinion on specific issuers.
LOGIC	
FI 03	[FI 03] will be applicable if you reported any ESG incorporation strategy (screening, thematic, or integration) in relation to your fixed income investments in [FI 01.1].

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ASSESSMENT			
FI 03	Maximum score: Three ★ The assessment of this indicator is based on your responses to [FI 03.1 & FI 03.2].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	'No incorporation strategies applied ' in FI 04 **OR** None of the above' in FI 03.1 and FI 03.2.	○	
	Two selections in FI 03.1 **AND** one selection in FI 03.2	★	
	Three selections in FI 03.1 **AND** two selections in FI 03.2	★★	
	Four selections in FI 03.1 **AND** FI 03.2	★★★	

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FI 04	Indicator status	Purpose	Principle
	MANDATORY	GATEWAY	PRI 1

FI 04	INDICATOR				
FI 04.1	Indicate the type of screening you conduct.				
		SSA	Corporate (financial)	Corporate (non-financial)	Securitised
	Negative/ exclusionary screening	❑	❑	❑	❑
	Positive/best-in-class screening	❑	❑	❑	❑
	Norms-based screening	❑	❑	❑	❑
FI 04.2	Describe your approach to screening for internally managed active fixed income.				
FI 04.3	Additional information [OPTIONAL]				

FI 04	EXPLANATORY NOTES
FI 04.1	This indicator allows you to provide details on the criteria upon which different screening methods are applied.
FI 04.2	Please provide details on how the screening criteria are established, how often the criteria are reviewed and how you notify clients and/or beneficiaries when changes are made.
LOGIC	
FI 04	[FI 04] will be applicable if you reported screening as part of your ESG incorporation strategy for your fixed income investments in [FI 01.1]. [FI 04.1] is a gateway indicator.

FI 04	DEFINITIONS
Negative/ exclusionary screening	The exclusion from a fund or portfolio of certain sectors, issuer or practices based on specific ESG criteria. This exclusion may be based on failure to meet international norms or standards.
Positive/best-in-class screening	Investment in sectors, issuers or projects selected for positive ESG performance relative to industry peers.
Norms-based screening	Screening of investments against minimum standards of business practice based on international norms.

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FI 05	Indicator status VOLUNTARY	Purpose ADDITIONALLY ASSESSED	Principle PRI 1

FI 05	INDICATOR
FI 05.1	Provide examples of ESG factors included in your screening criteria.

Type	ESG factors	Screening	Description
❑ SSA ❑ Corporate financial ❑ Corporate non-financial ❑ Securitised	❑ Environmental ❑ Social ❑ Governance	❑ Negative/ exclusionary ❑ Positive/best-in-class ❑ Norms-based	
[same as above]	[same as above]	[same as above]	
[same as above]	[same as above]	[same as above]	

FI 05.2	Additional information

FI 05	EXPLANATORY NOTES
FI 05.1	You are encouraged to provide at least three and up to five examples. As far as practicable, these should provide the clearest illustration of how ESG issues are used as screening criteria (negative/exclusionary screening, positive/best-in-class screening, and/or norms-based screening). Depending on your organisation, the examples may focus on different ESG issues or different sectors or may have resulted in different investment decisions (e.g., exclude, buy, sell, hold, overweight, underweight).
LOGIC	
FI 05	[FI 05] will be applicable if you reported that your organisation applies ESG screening in relation to your fixed income securities in [FI 01.1].
ASSESSMENT	
FI 05	Maximum score: Three ★ The assessment of this indicator is based on your responses to [FI 05.1].

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	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	No examples provided	⭘	
	Two selections in ESG factors	★	Number of ESG factors is counted across all examples given.
	Three selections in ESG factors	★★★	Number of ESG factors is counted across all examples given.

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FI 06	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 1

FI 06	INDICATOR	
FI 06.1	Indicate which systems your organisation has to ensure that fund screening criteria are not breached in fixed income investments.	
	Negative/exclusionary screening	❒ Analysis is performed to ensure that issuers meet screening criteria. ❒ We ensure that data used for the screening criteria is updated at least once a year. ❒ Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria. ❒ Audits of fund holdings are undertaken yearly by internal audit or compliance functions. ❒ Other; specify_____ ❒ None of the above
	Positive/best-in-class screening	❒ Analysis is performed to ensure that issuers meet screening criteria. ❒ We ensure that data used for the screening criteria is updated at least once a year. ❒ Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria. ❒ Audits of fund holdings are undertaken yearly by internal audit or compliance functions. ❒ Other; specify_____ ❒ None of the above
	Norms-based screening	❒ Analysis is performed to ensure that issuers meet screening criteria. ❒ We ensure that data used for the screening criteria is updated at least once a year. ❒ Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria. ❒ Audits of fund holdings are undertaken yearly by internal audit or compliance functions. ❒ Other; specify_____ ❒ None of the above
FI 06.2	Additional information [OPTIONAL]	

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FI 06	EXPLANATORY NOTES
FI 06.1	Breaches of fund screening criteria refer to occasions when bonds that should have been excluded are bought or remain in funds. For additional guidance, see the separate 'Reporting Framework: Overview and Guidance' document.
FI 06.2	Your description might include further details about how your screening criteria is implemented and the processes in place to ensure they are not breached. If there are no such processes, you can use this indicator to explain why.
LOGIC	
FI 06	[FI 06] will be applicable if you reported that your organisation applies ESG screening in relation to your fixed income securities in [FI 04.1]. The sections for positive, negative or norms-based screening sections will be applicable based on your response in [FI 04.1]
ASSESSMENT	
FI 06	Maximum score: Three ★ The assessment of this indicator is based on your responses to [FI 06.1].

Indicator scoring methodology

Selected response	Level score	Further Details
'None of the above'	⭘	
Two selections	★	
Three selections	★★	
Four or more selections	★★★	

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FI 07	Indicator status	Purpose	Principle
	MANDATORY TO REPORT, VOLUNTARY TO DISCLOSE	DESCRIPTIVE	PRI 1

FI 07	INDICATOR	
FI 07.1	Indicate what proportion of your thematic investments are:	
	❑ Green/SDG bonds linked to environmental goals	_____ %
	❑ Social/SDG bonds linked to social goals	_____ %
	❑ Sustainability/SDG bonds (combination of green and social linked to multiple SDG categories)	_____ %
	❑ Other _____	_____ %
FI 07 .2	Describe your organisation's approach to thematic fixed income investing.	
FI 07 .3	Additional information [OPTIONAL]	

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FI 07	EXPLANATORY NOTES
FI 07.1	The International Capital Markets Association (ICMA) defines green bonds as '... any type of bond instruments where the proceeds will be exclusively applied to finance or re-finance in part or in full new and/or existing eligible Green Projects […] with the objective to address key areas of environmental concern such as climate change, natural resources depletion, loss of biodiversity, and air, water or soil pollution.'. The International Capital Markets Association (ICMA) defines social bonds as '... any type of bond instruments where the proceeds will be exclusively applied to finance or re-finance in part or in full new and/or existing eligible Social Projects […] to help address or mitigate a specific social issue and/or seek to achieve positive social outcomes especially, but not exclusively, for a target population(s)'. The International Capital Markets Association (ICMA) defines sustainability bonds as '...bonds where the proceeds will be exclusively applied to finance or re-finance a combination of both Green and Social Projects'. In addition, recognising growing momentum within the global capital markets to establish a link between investments and achieving the SDGS, ICMA released in 2018 as part of their annual update, a High-Level Mapping to the Sustainable Development Goals. This aims to provide a broad frame of reference by which bond market participants can evaluate the financing objectives of a given Green, Social or Sustainability Bond/Bond Programme against the Sustainable Development Goals (SDGs). The Climate Bonds Initiative defines climate bonds as '[bonds] used to finance—or re-finance—projects needed to address climate. They range from wind farms and solar and hydropower plants to rail transport and building sea walls in cities threatened by rising sea levels. Only a small portion of these bonds have actually been labelled 'green' or 'climate bonds' by their issuers'.
FI 07.3	This indicator provides an opportunity to describe your organisation's general approach to thematic investing. This may include discussion of: • your motivations for following specific ESG themes in your investments; • your definition or scope for each of these themes; • whether you application of these themes differs by sector or by geographic region; • whether you invest for ESG impact, financial impact, or both; and/or the other factors you consider in your investment process and how the thematic elements relate to the overall process (e.g., any minimum requirements that all issuers must meet to be considered for investment).
LOGIC	
FI 07	[FI 07] will be applicable if you reported that your organisation reported themed investing in [FI 01.1].

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FI 08	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle **PRI 1**

FI 08	INDICATOR
FI 08.1	Indicate whether you encourage transparency and disclosure relating to the issuance of themed bonds as per the Green Bonds Principles, Social Bond Principles, or Sustainability Bond Guidelines. ❒ We require that themed bond proceeds are only allocated to environmentally or socially beneficial projects. ❒ We require the issuer (or third-party assurer) to demonstrate a process which determines the eligibility of projects to which themed bond proceeds are allocated. ❒ We require issuers to demonstrate a systematic and transparent process of disbursing themed bond proceeds to eligible projects until all funds are allocated. ❒ We require issuers to report at least once per year on the projects to which proceeds have been allocated, including a description of those projects. ❒ Other; specify _____ ❒ None of the above
FI 08.2	Describe the actions you take when issuers do not disburse bond proceeds as described in the offering documents.
FI 08.3	Additional information [OPTIONAL]

FI 08	EXPLANATORY NOTES		
LOGIC			
FI 08	[FI 08] will be applicable if your organisation reported themed investing in [FI 01.1].		
ASSESSMENT			
FI 08	Maximum score: Three ★ The assessment of this indicator is based on your responses to [FI 08.1].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	'None of the above'	⭘	
	One selection	★	
	Two selections	★★	
	Three selections	★★★	

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FI 09	Indicator status MANDATORY	Purpose ADDITIONALLY ASSESSED	Principle PRI 1

FI 09	INDICATOR
FI 09.1	Indicate how you assess the environmental or social impact of your thematic investments. ❒ We require issuers to report at least once per year on specific environmental or social impacts resulting from our themed investments. ❒ We ensure independent audits are conducted on the environmental or social impact of our investments. ❒ We have a proprietary system to measure environmental and social impact. ❒ We measure the impact of our themed bond investments on specific ESG factors such as carbon emissions or human rights. ❒ Other; specify _____ ❒ None of the above
FI 09.2	Additional information [OPTIONAL]

FI 09	EXPLANATORY NOTES		
LOGIC			
FI 09	[FI 09] will be applicable if your organisation reported themed investing in [FI 01.1].		
ASSESSMENT			
FI 09	Maximum score: Three ★ The assessment of this indicator is based on your responses to [09.1].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	'None of the above'	⭘	
	One selection	★	
	Two selections	★★	
	Three selections	★★★	

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PRI Principles for Responsible Investment

FI 10	Indicator status	Purpose	Principle
	MANDATORY	DESCRIPTIVE	PRI 1

FI 10	INDICATOR	
FI 10.1	Describe your approach to integrating ESG into traditional financial analysis.	
FI 10.2	Describe how your ESG integration approach is adapted to each of the different types of fixed income you invest in.	
	SSA	
	Corporate (financial)	
	Corporate (non-financial)	
	Securitised	
FI 10.3	Additional information [OPTIONAL]	

FI 10	EXPLANATORY NOTES
FI 10.1	This indicator gives you the opportunity to describe, among other things, your motivations for integrating ESG factors, how you apply your approach to each type of fixed income (broadly), how investment professionals and RI/ESG staff work together, how long this approach has been in effect and the proportion of your total fixed income assets it applies to. For the purposes of the PRI Reporting Framework, ESG integration should NOT include negative, positive or norms-based screening, thematic investing engagement or engagement, all of which fall within the broader definition of ESG incorporation.
FI 10.2	You may like to describe how your research process, criteria, weighting of ESG factors and other elements differ for each different type of issuer.

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FI 11	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 1

FI 11	INDICATOR				
FI 11.1	Indicate how ESG information is typically used as part of your investment process.				
		SSA	Corporate (financial)	Corporate (non-financial)	Securitised
	ESG analysis is integrated into fundamental analysis.	❑	❑	❑	❑
	ESG analysis is used to adjust the internal credit assessments of issuers.	❑	❑	❑	❑
	ESG analysis is used to adjust forecasted financials and future cash flow estimates.	❑	❑	❑	❑
	ESG analysis impacts the ranking of an issuer relative to a chosen peer group.	❑	❑	❑	❑
	An issuer's ESG bond spreads and its relative value versus its sector peers are analysed to find out if all risks are priced in.	❑	❑	❑	❑
	The impact of ESG analysis on bonds of an issuer with different durations/maturities are analysed.	❑	❑	❑	❑
	Sensitivity analysis and scenario analysis are applied to valuation models to compare the difference between base-case and ESG-integrated security valuation.	❑	❑	❑	❑
	ESG analysis is integrated into portfolio weighting decisions.	❑	❑	❑	❑
	Companies, sectors, countries and currency and monitored for changes in ESG exposure and for breaches of risk limits.	❑	❑	❑	❑
	The ESG profile of portfolios is examined for securities with high ESG risks and assessed relative to the ESG profile of a benchmark.	❑	❑	❑	❑
	Other; specify _____	❑	❑	❑	❑
FI 11.2	Additional information [OPTIONAL]				

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FI 11	EXPLANATORY NOTES
FI 11.1	You should indicate which approach(es) you take to integrating ESG analysis into your fixed income decisions across all fixed income assets. If you indicate 'other'. you should ensure that your description fits the scope of the PRI's definition of ESG integration—"the explicit and systematic inclusion of ESG factors in investment analysis and investment decisions". For more information about the options identified, refer to the CFAI and PRI's 'Guidance and Case Studies for ESG Integration – Equities and Fixed Income'.
LOGIC	
FI 11	[FI 11] will be applicable if you reported an ESG integration strategy in relation to your fixed income investments in [FI 01.1].
ASSESSMENT	
FI 11	Maximum score: Three ★ The assessment of this indicator is based on your responses to [11.1].

Indicator scoring methodology

Selected response	Level score	Further Details
No options selected	⭘	
One option selected	★	
Three options selected	★★	
Five options selected	★★★	

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PRI Principles for Responsible Investment

FI 12	Indicator status MANDATORY	Purpose ADDITIONALLY ASSESSED	Principle PRI 1

FI 12	INDICATOR				
FI 12.1	Indicate the extent to which ESG issues are reviewed in your integration process.				
		SSA	Corporate (financial)	Corporate (non-financial)	Securitised
	Environmental	❍ Systematically ❍ Occasionally ❍ Not at all	❍ Systematically ❍ Occasionally ❍ Not at all	❍ Systematically ❍ Occasionally ❍ Not at all	❍ Systematically ❍ Occasionally ❍ Not at all
	Social	❍ Systematically ❍ Occasionally ❍ Not at all	❍ Systematically ❍ Occasionally ❍ Not at all	❍ Systematically ❍ Occasionally ❍ Not at all	❍ Systematically ❍ Occasionally ❍ Not at all
	Governance	❍ Systematically ❍ Occasionally ❍ Not at all	❍ Systematically ❍ Occasionally ❍ Not at all	❍ Systematically ❍ Occasionally ❍ Not at all	❍ Systematically ❍ Occasionally ❍ Not at all
FI 12.2	Please provide more detail about how you review E, S and G factors in your integration process.				
	Issuer	Explanation			
	SSA				
	Corporate (financial)				
	Corporate (non-financial)				
	Securitised				
FI 12.3	Additional information [OPTIONAL]				

FI 12	EXPLANATORY NOTES
FI 12.1	This indicator allows you to explain whether you research and integrate analysis of different types of ESG factors. ESG factors differ in their relevance and materiality across companies, sectors and markets. This indicator does not relate to your final judgements about relevance or materiality, but rather to the scope of your research and integration processes. Systematic processes review the relevance of ESG factors across different sectors, markets, strategies and issues. Occasional reviews are typically ad hoc and applied by some, but not all, investment managers in your organisation based on region, market or team. For additional guidance on the terms 'systematic' and 'occasional', see the separate Reporting Framework Overview and Guidance document.
FI 12.2	This indicator allows you to provide additional information and examples of how you integrate ESG analysis into decision-making for different issuer types in [12.1].

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LOGIC			
FI 12	[FI 12] will be applicable if you reported that your organisation applies an ESG integration strategy in relationship to your fixed income investments in [FI 01.1].		
ASSESSMENT			
FI 12	Maximum score: Three ★ The assessment of this indicator is based on your responses to [12.1].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	All three options 'Not at all'	⭘	
	One/two ESG issue(s) occasionally reviewed	★	
	Three ESG issues occasionally reviewed **OR** One/two ESG issue(s) systematically reviewed	★★	
	Three ESG issues systematically reviewed	★★★	

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SECTION

Passively Managed Fixed Income

FI 13	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle PRI 1

FI 14	INDICATOR
FI 13.1	Describe your RI approach for passively managed fixed income assets.

FI 13	EXPLANATORY NOTES
FI 13.1	You are encouraged to provide details about how you consider ESG issues for passively managed investments.
LOGIC	
FI 13	[FI13] will be applicable if you reported that you hold passive fixed income investments in the 'Organisational overview' module, [OO FI 01].

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SECTION

Actively Managed Fixed Income — Engagement

FI 14	Indicator status MANDATORY TO REPORT, VOLUNTAY TO DISCLOSE	Purpose CORE ASSESSED	Principle PRI 2

FI 14 — INDICATOR

FI 14.1

Indicate whether you engage on your fixed income assets. Please exclude any engagements carried out solely in your capacity as a shareholder.

Proportion of assets	SSA	Corporate (financial)	Corporate (non-financial)	Securitised
>50%	❍	❍	❍	❍
26-50%	❍	❍	❍	❍
5-25%	❍	❍	❍	❍
More than 0%, less than 5%	❍	❍	❍	❍

FI 14.2

Indicate your motivations for conducting engagements.

	SSA	Corporate (financial)	Corporate (non-financial)	Securitised
To gain an understanding of ESG strategy and/or management	❍	❍	❍	❍
To encourage improved/increased ESG disclosure	❍	❍	❍	❍
To influence issuer practice (or identify the need to influence) on ESG issues	❍	❍	❍	❍

FI 14.3

Additional information

[OPTIONAL]

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FI 14	EXPLANATORY NOTES
FI 14.1	This indicator is an opportunity to demonstrate the extent of your active stewardship of the fixed income investments you manage.
FI 14.2	'Engagement' refers to interactions between the investor and current or potential investees (which may be companies, governments, municipalities, etc.) on ESG issues. Engagements are undertaken to influence (or identify the need to influence) ESG practices and/or improve ESG disclosure. Interactions for gathering information should not be reported as engagements.
LOGIC	
FI 14	[FI 14] will be applicable if in 'Organisational Overview' module, [OO 10.1] under "Fixed income – engagement" row, you reported "We engage with companies on ESG issues via our staff, collaborations or service providers".
ASSESSMENT	
FI 14	Maximum score: Three ★ The assessment of this indicator is based on your responses to [14.1].

Indicator scoring methodology

Selected response	Level score	Further Details
'We do not engage' **OR** 'less than 5%'	⭘	N/A for FI – SSA
'5-25%'	★	N/A for FI – SSA
'26-50%'	★★	N/A for FI – SSA
'>50%'	★★★	N/A for FI – SSA

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FI 15	Indicator status MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	Purpose ADDITIONALLY ASSESSED	Principle PRI 1,2

FI 15	INDICATOR
FI 15.1	Indicate how you typically engage with issuers as a fixed income investor or as both a fixed income and listed equity investor. (Please do not include engagements in which you are both a bondholder and shareholder but engage as a listed equity investor only.)

Type of Engagement	SSA	Corporate (financial)	Corporate (non-financial)	Securitised
Individual/Internal staff engagements	❑	❑	❑	❑
Collaborative engagements	❑	❑	❑	❑
Service provider engagements	❑	❑	❑	❑

FI 15.2 Indicate how your organisation prioritises engagements with issuers.

	SSA	Corporate (financial)	Corporate (non-financial)	Securitised
Size of holdings	❒	❒	❒	❒
Credit quality of the issuer	❒	❒	❒	❒
Duration of holdings	❒	❒	❒	❒
Quality of transparency on ESG	❒	❒	❒	❒
Specific markets and/or sectors	❒	❒	❒	❒
Specific ESG themes	❒	❒	❒	❒
Issuers in the lowest ranks of ESG benchmarks	❒	❒	❒	❒
Issuers in the highest ranks of ESG benchmarks	❒	❒	❒	❒
Specific issues considered priorities for the investor based on input from clients and beneficiaries	❒	❒	❒	❒
Other; describe _____	❒	❒	❒	❒

FI 15.3 Indicate when your organisation conducts engagements with issuers.

We engage pre-investment.	❒	❒	❒	❒
We engage post-investment.	❒	❒	❒	❒
We engage proactively in anticipation of specific ESG risks and/or opportunities.	❒	❒	❒	❒

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	We engage in reaction to ESG issues that have already affected the issuer.	❒	❒	❒	❒
	We engage prior to ESG-related divestments.	❒	❒	❒	❒
	Other; describe _____	❒	❒	❒	❒
FI 15.4	Indicate what your organisation conducts engagements with issuers on.				
	We engage on ESG risks and opportunities affecting a specific bond issue or its issuer.	❒	❒	❒	❒
	We engage on ESG risks and opportunities affecting the entire industry or region that the issuer belongs to.	❒	❒	❒	❒
	We engage on specific ESG themes across issuers and industries (e.g., human rights).	❒	❒	❒	❒
	Other; describe _____	❒	❒	❒	❒
FI 15.5	Indicate how your organisation ensures that information and insights collected through engagement can feed into the investment decision-making process.				
	Ensuring regular cross-team meetings and presentations.	❒	❒	❒	❒
	Sharing engagement data across platforms that is accessible to ESG and investment teams.	❒	❒	❒	❒
	Encouraging ESG and investment teams to join engagement meetings and roadshows.	❒	❒	❒	❒
	Delegating some engagement dialogue to portfolio managers/credit analysts.	❒	❒	❒	❒
	Involving portfolio managers when defining an engagement programme and developing engagement decisions.	❒	❒	❒	❒
	Establishing mechanisms to rebalance portfolio holdings based on levels of interaction and outcomes of engagements.	❒	❒	❒	❒
	Considering active ownership as a mechanism to assess potential future investments.	❒	❒	❒	❒
	Other, describe _____	❒	❒	❒	❒
	We do not ensure that information and insights collected through engagement can feed into the investment decision-making process.	❒	❒	❒	❒
FI 15.6	Additional information [OPTIONAL]				

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FI 15	EXPLANATORY NOTES
FI 15.2	This indicator allows you to explain how you prioritise engagements. For more information about the options identified, refer to the PRI's 'ESG Engagement for Fixed Income Investors – Managing Risks, Enhancing Returns'.
FI 15.3	Engagement cases usually fall into two categories: ■ Proactive: When investors seek dialogue with priority companies to manage more medium/long-term issues based on their analysis of potentially material ESG issues and megatrends ■ Reactive: When investors initiate dialogue with companies in reaction to a recent downgrade, controversy or scandal which is presenting a financial and/or reputational risk Timing the engagement is a strategic decision, because the bondholder's influence with issuers varies throughout the issuance lifecycle. For more information about the options identified, refer to the PRI's 'ESG Engagement for Fixed Income Investors – Managing Risks, Enhancing Returns'.
FI 15.4	Broadly speaking, ESG factors can affect the performance of its bonds at different levels: ■ **Issuer/company level:** These are risks that affect a specific bond issue or its issuer and not the market as a whole. They are generally related to factors such as the governance of an issuer, its regulatory compliance, the strength of its balance sheet and, at the corporate level, brand reputation. For example, the yield on the corporate debt of the car manufacturer Volkswagen rose and stayed high for a prolonged period of time in the aftermath of the 2015 emission scandal. ■ **Industry/geographic level:** These risks stem from wider-ranging issues affecting the entire industry or region that the issuer belongs to. They can be related to regulatory factors, technological changes associated with the business activity the company is involved in, and/or the markets it sources or sells to. For example, utilities are relatively more exposed to climate change risks than financials. ■ Thematic level engagement: This refers to thematic engagement of one issue, across industries. For more information about the options identified, refer to the PRI's 'ESG Engagement for Fixed Income Investors – Managing Risks, Enhancing Returns'.
FI 15.5	It is considered best practice to keep relevant internal functions (risk, credit, responsible investment, corporate governance, equities teams etc.) updated on the progress and outcomes of the engagement, to ensure findings are incorporated into investment decisions. For more information about the options identified, refer to the PRI's 'ESG Engagement for Fixed Income Investors – Managing Risks, Enhancing Returns'.
LOGIC	
FI 15	[FI 15] will be applicable if in 'Organisational Overview' module, [OO 10.1] under "Fixed income – engagement" row, you reported "We engage with companies on ESG issues via our staff, collaborations or service providers".
ASSESSMENT	
FI 15	Maximum score: Three ★ The assessment of this indicator is based on your responses to [15.1].

Indicator scoring methodology

Selected response	Level score	Further Details
'We do not engage' in FI 15.1	⭘	'Other' will not count as a selection N/A for FI – SSA
One selection from FI 15.2, 15.3, 15.5	★	'Other' will not count as a selection N/A for FI – SSA
One selections from FI 15.2 **AND** at least two selections from 15.3, 15.5	★★	'Other' will not count as a selection N/A for FI – SSA

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	One election from FI 15.2, **AND** at least three selections from 15.3, 15.5	★★★	'Other' will not count as a selection N/A for FI – SSA

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FI 16	Indicator status MANDATORY TO REPORT, VOLUNTARY TO DISCLOSE	Purpose ADDITIONALLY ASSESSED	Principle PRI 1,2

FI 16	INDICATOR	
FI 16.1	Indicate whether your publicly available policy documents explicitly refer to fixed income engagement separately from engagements in relation to other asset classes.	
	❍ Yes	❍ No
FI 16.2	Please attach or provide a URL to your fixed income engagement policy document. [OPTIONAL]	
FI 16.3	Additional information [OPTIONAL]	

FI 16	EXPLANATORY NOTES		
LOGIC			
FI 16	[FI 16] will be applicable if in 'Organisational Overview' module, [OO 10.1] under "Fixed income – engagement" row, you reported "We engage with companies on ESG issues via our staff, collaborations or service providers".		
ASSESSMENT			
FI 16	Maximum score: Three ★ The assessment of this indicator is based on your responses to [16.1].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	'No'	⭘	N/A for FI – SSA
	'Yes'	★★★	N/A for FI – SSA

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SECTION

Outputs and Outcomes

FI 17	Indicator status MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	Purpose ADDITIONALLY ASSESSED	Principle GENERAL

FI 17	INDICATOR				
FI 17.1	Indicate whether your organisation measures how your incorporation of ESG analysis in fixed income has affected investment outcomes and/or performance.				
		SSA	Corporate (financial)	Corporate (non-financial)	Securitised
	We measure whether incorporating ESG impacts portfolio risk.	❑	❑	❑	❑
	We measure whether incorporating ESG impacts portfolio returns.	❑	❑	❑	❑
	We measure the ESG performance/profile of portfolios (relative to the benchmark).	❑	❑	❑	❑
	None of the above	❑	❑	❑	❑
FI 17.2	Describe how your organisation measures how your incorporation of ESG analysis in fixed income has affected investment outcomes and/or ESG performance. [OPTIONAL]				
FI 17.3	Additional information [OPTIONAL]				

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FI 17	EXPLANATORY NOTES
FI 17.1	This indicator aims to capture whether you measure the impact, positive or negative, of taking account and managing ESG issues on reputation, returns, risk or ESG performance. This indicator allows you to explain how, if at all, your ESG incorporation strategy has affected portfolio design and construction (e.g., in relationship to particular sectors, geographies, exclusions or positive screening, or as a result of ESG analysis, integration and engagement).
FI 17.2	Describe how you measure the impact of ESG issues on financial returns, risks and/or ESG performance.
LOGIC	
FI 17	[FI 17] will be applicable if you reported that a screening, thematic or integration strategy is applied to some part of your actively managed Fixed Income in [FI 01.1]. It will also be applicable if you reported your fixed income investments to be passively managed in [OO FI 01].
ASSESSMENT	
FI 17	Maximum score: Three ★ The assessment of this indicator is based on your responses to [17.1].

Indicator scoring methodology

Selected response	Level score	Further Details
'None of the above'	⭘	
One selection	★	
Two selections	★★	
Three selections	★★★	

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PRI Principles for Responsible Investment

FI 18	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle PRI 1, 2

FI 18	INDICATOR			
FI 18.1	Provide examples of how your incorporation of ESG analysis and/or your engagement of issuers has affected your fixed income investment outcomes during the reporting year.			
	Type of fixed income	**ESG issue and explanation**	**RI strategy applied**	**Impact on investment decision or performance**
	• SSA • Corporate (financial) • Corporate (non-financial) • Securitised [dropdown]		• Screening • Thematic • Integration • Engagement • ESG incorporation in passively managed funds [dropdown]	
			[same as above]	
			[same as above]	
			[same as above]	
			[same as above]	
FI 18.2	Additional information [OPTIONAL]			

FI 18	EXPLANATORY NOTES
FI 18	You are encouraged to provide at least three and up to five examples. The examples should clearly explain individual cases in which your RI strategy affected your investment decision and/or outcome. Depending on your organisation, the examples may focus on different ESG issues or different sectors or may have resulted in different investment decisions (e.g., exclude, buy, sell, hold, overweight, underweight). Further details may include: • ESG issue and explanation—you are not expected to disclose the name of the company but instead can use generic descriptions, e.g., UK bank, Chinese retailer, etc.; • impact on investment view or performance—this can include the number of holdings in your portfolio that is affected and in which sectors; and/or • explain whether you believe your strategy reduced the overall risk or volatility of the fund or improved the fund's overall ESG performance.
LOGIC	
FI 18	[FI 18] will be applicable if you reported that a screening, thematic or integration strategy is applied to some part of your actively managed fixed income in [FI 01.1]. It will also be applicable if you reported your fixed income investments to be passively managed in [OO FI 01.1]

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	The options in field ‘which strategies were analysed?' will be applicable depending on your responses in [FI 01.1] for active strategies (screening, thematic, integration or combination of ESG incorporation strategies).

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PRI REPORTING FRAMEWORK 2019
Direct — Private Equity

November 2018

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United Nations Global Compact
An investor initiative in partnership with UNEP Finance Initiative and UN Global Compact

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), the purpose of the indicator and the PRI Principle to which it relates.

	Indicator status	Purpose	Principle
xxx 01	*MANDATORY*	*CORE ASSESSED*	*PRI 2*

Indicator status

MANDATORY	Mandatory indicators reflect core practices. These responses will be made public and must be completed to submit the framework.
MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	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.
VOLUNTARY	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.
Peering	These indicators are used to determine your peer groups for assessment purposes.
Core assessed	These indicators form the core of the assessment and represent the majority of your final assessment score.
Additional assessed	These indicators represent more advanced or alternative practices and contribute to a smaller part of your score.
Descriptive	These are open-ended narrative indicators, allowing you to describe your activities.

Underneath the indicator

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

xxx 01	*EXPLANATORY NOTES*
xxx 01.1	This provides guidance about how to interpret the sub-indicators, including examples of what could be reported.
xxx 01.2	
LOGIC	
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.
ASSESSMENT	
xxx 01	This provides a brief overview of the pilot assessment approach for this indicator.

xxx 01	*DEFINITIONS*
xxx 01	Specific terms that are used in the indicator are defined here.

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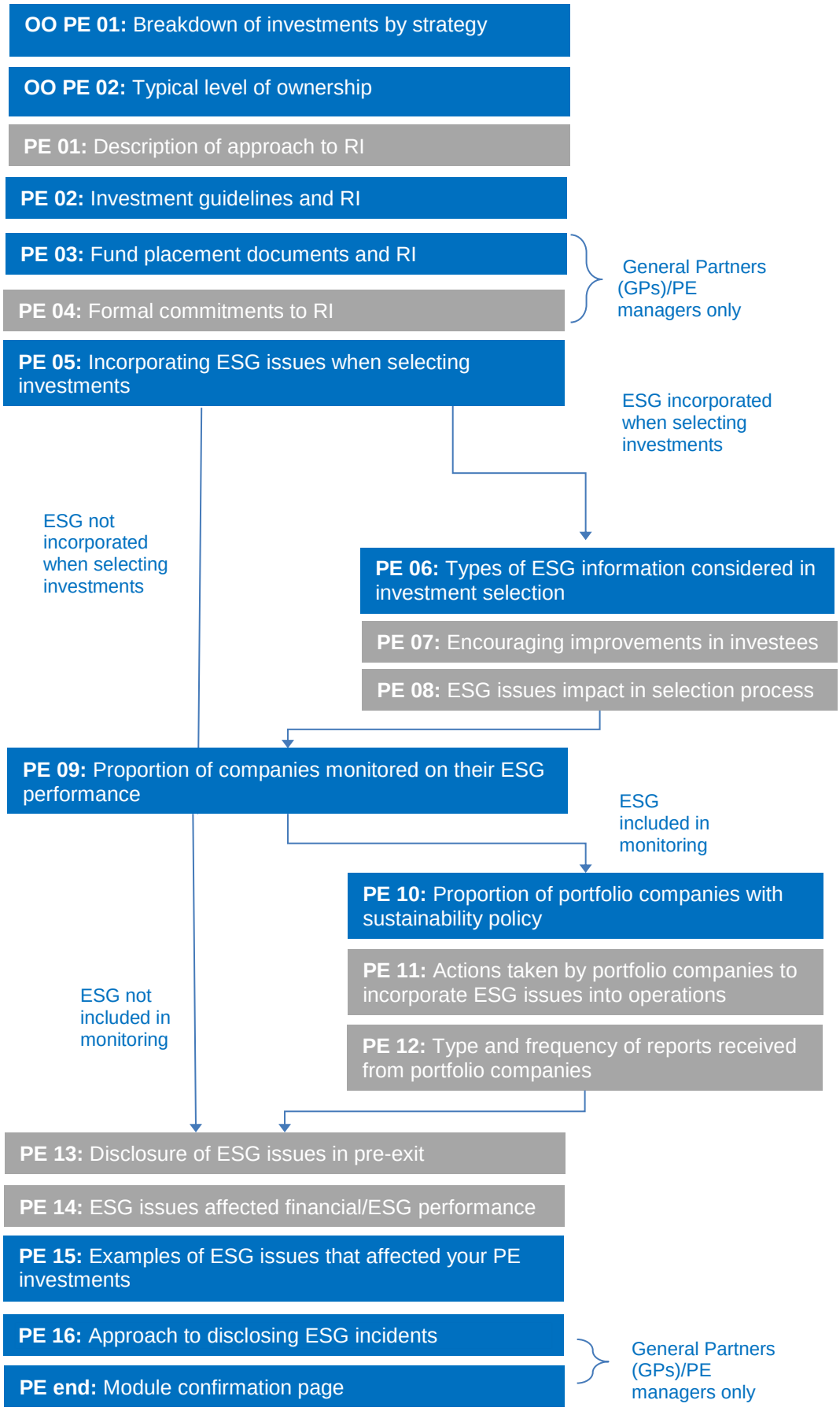
Pathways through the module



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Preface

This module seeks information from general partners (GPs), private equity (PE) fund managers or limited partners (LPs) that act as direct investors or co-investors in portfolio companies. Indirect private equity investments made by selecting a GP or through a fund-of-funds should be reported in the *Indirect—Manager Selection, Appointment and Monitoring (SAM)* module. If your co-investment programme does not differ from your standard approach to ESG in manager selection, then co-investments can be reported in the *Indirect-Manager Selection, Appointment and Monitoring (SAM)* module also.

Investments in publicly listed companies are typically reported in the *Listed Equity—Active Ownership (LEA)* and *Listed Equity—Incorporation (LEI)* modules, but they may be reported in this module when they form part of a PE strategy (i.e. during a take-private or IPO process).

Investments in private debt are reported in the *Direct—Fixed Income (FI)* module under *Corporate (non-financial) debt*. Property and Infrastructure investments are reported in the dedicated *Direct—Property (PR)* and *Direct—Infrastructure (INF)* modules.

Some of the indicators in this module also overlap, partially or fully, with the following standards/initiatives, and this overlap has been noted in the Explanatory Notes under the relevant indicators:

- The PRI Limited Partners' Responsible Investment Due Diligence Questionnaire (PRI LP Responsible Investment DDQ)
- The PRI guidance on ESG monitoring, reporting and dialogue in private equity (PRI ESG monitoring/reporting guidance)
- The Institutional Limited Partners Association Due Diligence Questionnaire Version 1.2 (ILPA DDQ).

Please note that this module seeks information at the organisational level and for your private equity investments in aggregate, not at a fund-by-fund level.

The module has two main sections:

- pre-investment processes, i.e., initial screening, due diligence and investment decision-making processes that your organisation has in place for new private equity investments; and
- post-investment processes, i.e., consideration of ESG issues in private equity investment monitoring and implementation processes.

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PE	DEFINITIONS
General partner/manager	A general partner (GP) typically refers to an investment firm that raises private equity funds, with the responsibility for selecting and managing investments.
Limited partner/clients	A limited partner (LP)/client may refer to institutional investors, sovereign and endowment funds, family offices and high net-worth individuals. These organisations typically act as investors in a fund and as limited partners do not take part in the fund's active management.

Summary of updates

The Private Equity module has not changed significantly since 2018. Some minor amendments have been made to improve data quality or assessment. The guidance has also been clarified throughout.

2018 Indicator	Update summary
PE 02	PE 02.2 Indicator has been reworded.

To view a detailed summary of changes to the modules, please click here.

For any word limit in the module, please click here.

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SECTION

Overview

PE 01	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle PRI 1-6

PE 01	INDICATOR
PE 01.1	Provide a brief overview of your organisation's approach to responsible investment in private equity.

PE 01	EXPLANATORY NOTES
PE 01	The information reported in this indicator will provide context on your organisation's private equity investments and your approach towards responsible investment in private equity.
PE 01.1	This may include a discussion of how your private equity investment strategy(ies) (i.e., level of ownership, type of sectors and companies, geographical spread, etc.) affect the way you may influence your private equity investments and thus responsible investment implementation.

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PE 02	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 2

PE 02	INDICATOR
PE 02.1	Indicate whether your organisation's investment activities are guided by a responsible investment policy / follow responsible investment guidelines.
	❍ Our investment activities are guided by a responsible investment policy. ❍ Our investment activities are not guided by a responsible investment policy. ❍ We do not have a responsible investment policy.
PE 02.2	Describe the scope of the responsible investment/guidelines, and how your organisation [outlines or conveys] its expectations on responsible investment to internal staff and portfolio company management. [OPTIONAL]

PE 02	EXPLANATORY NOTES
PE 02	*Investment guidelines* Refers to either general private equity investment guidelines with reference to responsible investment or dedicated responsible investment guidelines/policy. The *Strategy & Governance (SG)* module covers your organisation's responsible investment policy while this indicator focuses on the specifics of how responsible investment is implemented and ESG issues are considered in private equity pre- and post-investment. If there is overlap, please report your policy and guidelines in both SG and here. The content of this indicator overlaps with: • PRI LP Responsible Investment DDQ 1.1 • ILPA DDQ 10.1 (under Basic Questions)
PE 02.2	You may include a description and discussion of: • Coverage of the responsible investment guidelines the range of ESG issues covered by the guidelines • Whether the guidelines define relevant ESG issues for all and/or a subset of sectors in your investment universe • Whether the guidelines are based on recognised international principles, codes or standards • Whether the guidelines define ESG-related responsibilities for internal staff • Whether there are any major exceptions or variations in your organisation's implementation of the guidelines The content of this indicator overlaps with: • PRI LP Responsible Investment DDQ 1.2, 1.3 • ILPA DDQ 10.2, 10.4 (under Basic Questions)
LOGIC	

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PRI Principles for Responsible Investment

PE 02	[PE 02.2] will be applicable if 'Our investment guidelines do refer to responsible investment' is reported in [PE 02.1].		
ASSESSMENT			
PE 02	Maximum score: Three ★ The assessment of this indicator is based on your responses to [PE 02.1].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	'We do not have a responsible investment policy' OR 'Our investment activities are not guided by a responsible investment policy'	○	
	'Our investment guidelines are guided by a responsible investment 'policy'	★★★	

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SECTION

Fund-raising of private equity funds

PE 03	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 1,4,6

PE 03	INDICATOR	
PE 03.1	Indicate whether your most recent fund placement documents (private placement memorandum (PPM) or similar) refer to responsible investment. ❍ Yes ❍ No ❍ Not applicable as our organisation does not fund-raise	
PE 03.2	Indicate how your most recent fund placement documents (PPM or similar) refer to the following responsible investment.	
	❑ Policy and commitment to responsible investment	
	❑ Approach to ESG issues in pre-investment processes	
	❑ Approach to ESG issues in post-investment processes	
	❑ Approach to ESG reporting	
PE 03.3	Describe how your organisation refers to responsible investment in fund placement documents (PPMs or similar). [OPTIONAL]	
PE 03.4	Explain why your organisation does not fund-raise.	

PE 03	EXPLANATORY NOTES
PE 03	This indicator covers the fund-raising process in which the relationship between the direct investor/ general partner (GP) and the indirect investor client/limited partner (LP) is established. A fund placement document, Private Placement Memorandum (PPM) or similar document issued by the GP about a particular fund can provide the LP with a general sense of your approach to responsible investment and management of ESG issues. The indicator is applicable for general partners (GPs)/PE fund managers only. It is not applicable for asset owners that are directly or co-investing in private equity. If your organisation does not fund-raise, please select “Not applicable because our organisation does not fund-raise”. If your organisation does fund-raise but was not actively fund-raising during the reporting year, please select the option that best represents your typical approach. As a general rule, this is the approach your organisation used in your most recent round of fund-raising.

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	For an explanation of the ESG-related information that GPs might include in their PPM, refer to the PRI LP Responsible Investment DDQ. The content of this indicators overlaps with: • PRI LP Responsible Investment DDQ 1.2, 1.3 • ILPA DDQ 10.2, 10.4 (under Basic Questions)
PE 03.3	You may include a discussion of your fund placement document's/PPM's coverage: • Policy (e.g., reference to responsible investment and consideration of ESG issues throughout all investment stages) • Pre-investment (e.g., processes such as due diligence and the consideration of ESG issues in these) • Post-investment (e.g., ESG implementation programmes for portfolio companies, tracking achievements and identifying opportunities through monitoring processes, such as audits that consider ESG issues, until exit) Please report on any fund placement documents and PPMs issued recently, not necessarily during the reporting year.
LOGIC	
PE 03	[PE 04] will not be applicable if you report "Not applicable as our organisation does not fund-raise" in [PE 03.1]. [PE 03.2] and [PE 03.3] will be applicable if 'Yes' is reported in [PE 03.1]. [PE 03.4] will be applicable if 'Not Applicable' is reported in [PE 03.1].
ASSESSMENT	
PE 03	Maximum score: Three ★ The assessment of this indicator is based on your response to [PE 03.2]. Asset owners/limited partners are not assessed on this indicator. If you report "Not applicable as our organisation does not fund-raise", this indicator will not form part of your score.

Indicator scoring methodology

Selected response	Level score	Further Details
'No'	⭘	
'Yes' and one selection	★	
'Yes' and two selections	★★	
'Yes' and three selections	★★★	

PE 03	DEFINITIONS
Fund placement documents or Private Placement Memorandum (PPM)	A fund placement document or Private Placement Memorandum (PPM) provides a broad range of information to help potential investors learn about the firm and its investment strategy as well as the proposed summary terms and conditions of the investment opportunity. These types of documents are also known as an "Offering Memorandum". A private equity firm will issue a fund placement documents or PPM to prospective limited partners/investors when it is attempting to raise capital through a fund offering.

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PE 04	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PRI 4

PE 04	INDICATOR
PE 04.1	Indicate whether your organisation made formal commitments to responsible investment in the Limited Partnership Agreement (LPA) of your most recent fund(s), or through side letters when requested by investors. ❍ **Yes** ❑ In LPA, incorporated in the original draft as standard procedure ❑ In LPA, as requested by investors ❑ In side letter(s) ❑ Other, please specify__ ❍ **No** ❑ We do not make formal commitments to RI in our fund terms ❑ We were not requested by our investors to make formal commitments to RI in our fund terms
PE 04.2	Additional information

PE 04	**EXPLANATORY NOTES**
PE 04	The indicator is applicable for general partners (GPs)/PE fund managers only. It is not applicable for asset owners that are directly or co-investing in private equity. For an explanation of how GPs might approach this aspect of responsible investment, refer to PRI guidance on Incorporating responsible investment requirements into private equity fund terms. This of this indicator overlaps with: • PRI LP Responsible Investment DDQ 1.4
PE 04.1	*Fund formation contracts, Limited Partnership Agreements (LPAs)* Formal commitments on responsible investment implementation and consideration of ESG issues can be requested by investors/LPs and included in fund formation contracts, LPAs and/or side letters. The GP might formalise their commitments to responsible investment in the first draft of the LPA which is presented to LPs. The LP will review the document and may negotiate ESG-related provisions with the GP, resulting in either the LPA being amended or the GP granting specific ESG provisions in a side letter to that particular LP before its admittance to the fund. Please report on any fund formation contracts, LPAs and side letters drawn up for your most recent fund(s), not necessarily during the reporting year.
PE 04.2	You may include a discussion of how your organisation's responsible investment commitments are formalised: • Adoption and alignment of policies between GP and LP in relationship to responsible investment and ESG issues • Commitments to any external principles, standards and guidelines • Exclusion of investments in certain areas, either based on a GP's/manager's own restrictions or in accordance with the LP's requirements

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PRI Principles for Responsible Investment

	• Processes in place to deliver approach towards responsible investment and consideration of ESG issues • Listing of specific E, S and G issues (e.g., climate change and remuneration) and how they will be dealt with (if required) • How reporting on ESG issues will be carried out during the life of the fund(s) • How and when potential incidents among portfolio companies will be communicated to investors. You may also use this indicator to explain why you do not make formal commitments to RI in your fund terms.
LOGIC	
PE 04	This section (indicators [PE 03] and [PE 04]) is about responsible investment and ESG inclusion in relation to fund-raising and promotion of funds. It is therefore applicable only to general partners (GPs)/PE fund managers. It is not applicable for co-investing asset owners (AOs)/limited partners (LPs).
ASSESSMENT	
PE 04	Maximum score: Three ★ The assessment of this indicator is based on your response to [PE 04.1]. Organisations with clients that do not ask them to make formal commitments to responsible investment will not be assessed on this indicator, and it will be removed from the denominator of their PE module score. Asset owners/limited partners are not assessed on this indicator.

Indicator scoring methodology

Selected response	Level score	Further Details
"We were not requested by our clients to make formal commitments to RI in our fund terms"	N/A	
"No"	⭘	
Only "Other" is selected	★	
Any other option	★★★	**Any selection of the first three options**

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SECTION

Pre-investment (selection)

PE 05	Indicator status MANDATORY	Purpose GATEWAY	Principle PRI 1

PE 05	INDICATOR	
PE 05.1	During due diligence, indicate if your organisation typically incorporates ESG issues when selecting private equity investments.	
	❍ Yes	❍ No
PE 05.2	Describe your organisation's approach to incorporating ESG issues in private equity investment selection.	
PE 05.3	Additional information [OPTIONAL]	

PE 05	EXPLANATORY NOTES
PE 05	This gateway indicator allows you to report whether your organisation incorporates ESG issues when selecting investments. The details of your processes will be captured in subsequent indicators. The content of this indicator overlaps with: • PRI LP Responsible Investment DDQ 2.2
PE 05.2	Describe your approach in terms of the different stages leading up to the investment decision. This may include a discussion of: • Whether the incorporation of ESG issues in pre-investment is determined by client mandates and, in that case, how it has been structured • How ESG issues, short- and long-term, are incorporated into the pre-investment process • How you use ESG issues to assess downside risk and value creation opportunities • Any differences in how ESG issues are taken into account in different sectors and geographic regions • How your approach to ESG issues differs between investment strategies or within strategies with significant variations *Scope* This indicator covers all stages of your pre-investment decision making process (initial screening, due diligence, investment decision).
LOGIC	
PE 05	Reporting "Yes" in [PE 05.1] will make [PE 06], [PE 07], and [PE 08] applicable (reporting "No" in [PE 05.1] will not trigger them). [PE 05.2] will be applicable if 'Yes' is reported in [PE 05.1].

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ASSESSMENT	
PE 05	This indicator is not assessed, but a 'No' response will result in a zero score for the whole of the pre-investment section.

PE 05	**DEFINITIONS**
ESG incorporation	Please see the document Main Definitions.

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PE 06	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 1,3

PE 06	INDICATOR
PE 06.1	Indicate what type of ESG information your organisation typically considers during your private equity investment selection process. ❑ Raw data from target company ❑ Benchmarks against other companies ❑ Sector level data/benchmarks ❑ Country level data/benchmarks ❑ Reporting standards, industry codes and certifications ❑ International initiatives, declarations or standards ❑ Engagements with stakeholders (e.g., customers and suppliers) ❑ Advice from external resources ❑ Other; specify_____ ❑ We do not track this information.
PE 06.2	Describe how this information is reported to, considered and documented by the Investment Committee or similar.

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PE 06	EXPLANATORY NOTES
PE 06.2	This may include a discussion of: • Sources for ESG issues from which you often seek information • Whether there is a difference between the sources used by internal and external advisors • Whether your organisation keeps records of ESG information considered in the investment selection process The content of this indicator overlaps with: • PRI LP Responsible Investment DDQ 2.2, 2.4
LOGIC	
PE 06	[PE 06] is applicable if "Yes" is reported in [PE 05.1]
ASSESSMENT	
PE 06	Maximum score: Three ★ The assessment of this indicator is based on your response to [PE 06.1].

Indicator scoring methodology

Selected response	Level score	Further Details
'We do not track this information' or 1 selection	⭘	
2 selections	★	Including if 'other' is selected
3–4 selections	★★	Including if 'other' is selected
More than 4 selections	★★★	Including if 'other' is selected

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PE 07	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PRI 1,2

PE 07	INDICATOR
PE 07.1	During deal structuring, what is the process for integrating ESG-related considerations into the deal documentation and/or the post-investment action plan? ❍ Yes ❑ Formally/through a post-investment action plan or value enhancement plan ❑ Verbally/through dialogue ❑ Other; specify_____ ❍ We do not set expectations for portfolio companies on ESG-related considerations
PE 07.2	Describe the nature of these improvements and provide examples (if any) from the reporting year.
PE 07.3	Additional information

PE 07	EXPLANATORY NOTES
PE 07	This indicator covers whether the General Partner (GP) typically encourages continuous improvements of portfolio companies' management of ESG issues. This may take place during the deal structuring process (but does not necessarily have to be in the form of a legally binding agreement) or post investment. Upon acquisition, the GP may wish to take a strategic approach on certain E, S and/or G issues and suggest value-enhancing activities to be implemented by companies within a given time span, e.g., as part of the 100 day plan. The content of this indicator overlaps with: • PRI LP Responsible Investment DDQ 2.5
LOGIC	
PE 07	[PE 07] is applicable if "Yes" is reported in [PE 05.1] [PE 07.2] will be applicable if 'Yes' is reported in [PE 07.1].
ASSESSMENT	
PE 07	Maximum score: Three ★ The assessment of this indicator is based on your response to [PE 07.1].

Indicator scoring methodology

Selected response	Level score
'We do not set expectations for portfolio companies on ESG-related consideration'	⭘
'Yes – Other'	★
'Yes – Verbally/through dialogue'	★★
'Yes – Formally/through a post-investment action plan or value enhancement plan''	★★★

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PE 08	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PRI 1

PE 08	INDICATOR
PE 08.1	Indicate how ESG issues impacted your private equity investment selection processes during the reporting year. ❑ ESG issues helped identify risks. ❑ ESG issues helped identify opportunities for value creation. ❑ ESG issues led to the abandonment of potential investments. ❑ ESG issues were considered but did not have an impact on the investment selection process. ❑ Other; specify _____ ❑ We do not track this potential impact.
PE 08.2	Indicate how ESG issues impacted your private equity investment deals during the reporting year. ❑ ESG issues impacted the investment in terms of price offered and/or paid. ❑ ESG issues were included in the post-investment action plan/100 day plan ❑ ESG issues impacted the terms in the shareholder/purchase agreements and/or lending covenants. ❑ ESG issues were considered but did not have an impact on the deal structuring process. ❑ Other; specify _____ ❑ We do not track this potential impact.
PE 08.3	Additional information

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PE 08	EXPLANATORY NOTES
PE 08.3	The content of this indicator overlaps with: • PRI LP Responsible Investment DDQ 2.3 You are encouraged to generalise your impact measures, analysis and conclusions across different investment selection processes and to not report on every single deal and its individual characteristics. Indicator [PE 15] will allow your organisation to provide specific examples. "ESG issues were considered but did not have an impact on the investment selection/deal structuring process" refers to situations in which no ESG issues were identified or in which ESG issues were considered during the investment selection but were considered to be below the materiality threshold and therefore did not impact the investment.

ASSESSMENT

PE 08	Maximum score: Three ★ The assessment of this indicator is based on your response to [PE 08.1] and [PE 08.2].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	'We do not track this potential impact' in PE 08.1 and PE 08.2.	○	
	One selection in either PE 08.1 OR PE 08.2.	★	Including if 'other' is selected
	At least one selection in PE 08.1 AND PE 08.2.	★★	
	At least three selections from PE 08.1 AND PE 08.2.	★★★	

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SECTION

Post-investment (monitoring)

PE 09	Indicator status MANDATORY	Purpose GATEWAY/CORE ASSESSED	Principle PRI 2

PE 09	INDICATOR	
PE 09.1	Indicate whether your organisation incorporates ESG issues in investment monitoring of portfolio companies.	
	❍ Yes	❍ No
PE 09.2	Indicate the proportion of portfolio companies where your organisation included ESG performance in investment monitoring during the reporting year.	
	❍ >90% of portfolio companies ❍ 51-90% of portfolio companies ❍ 10-50% of portfolio companies ❍ <10% of portfolio companies (in terms of total number of portfolio companies)	
PE 09.3	Indicate ESG issues for which your organisation typically sets and monitors targets (KPIs or similar) and provide examples per issue.	
	ESG issues	**List up to three example targets per issue**
	❑ Environmental	
	❑ Social	
	❑ Governance	
	❑ We do not set and/or monitor against targets.	
PE 09.4	Additional information [OPTIONAL]	

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PE 09	EXPLANATORY NOTES
PE 09	This indicator aims to capture your approach to ESG performance monitoring. The type of monitoring activities undertaken can range from individual engagements with boards and/or with senior management to reviews of ESG information in portfolio company reports. The content of this indicators overlaps with: • PRI LP Responsible Investment DDQ 3.2 • PRI Monitoring/Reporting guidance 2.2, 2.3
PE 09.2	*Monitoring ESG performance when holding board seats* Leveraging a seat on the portfolio company board to raise the consideration of ESG issues, e.g., by discussing with management or requesting reports, is considered monitoring. Being on the board and not encouraging, reviewing reports or participating in discussions around ESG issues should not be reported as monitoring.
PE 09.3	ESG issues vary between sectors, portfolio companies, markets, etc. This indicator seeks information about which relevant E, S and G issues you set and monitor targets for among portfolio companies. For example, an environmental target might be water quality or CO2 emissions. Note that it is only mandatory to report and disclose one example per E, S and G issue (right-hand column). The remaining rows per E, S and G issue are voluntary to report and disclose.
PE 09.4	*Investment monitoring activities* You may include a discussion of: • How you monitor ESG issues on an ongoing basis and whether your approaches to ESG issues differ if the associated risks and/or opportunities are expected to occur after you invest and prior to exit • How the approach might differ between sectors, geographies and PE strategies as appropriate • Frequency and type of communication with senior management and the board
LOGIC	
PE 09	If you report "Yes" in [PE 09.1], indicators [PE 10 - PE 12] will be applicable. If you report "No" in [PE 09.1] they will not be applicable. [PE 09.2] and [PE 09.3] will be applicable if "Yes" is reported in [PE 09.1].
ASSESSMENT	
PE 09	Maximum score: Three ★ The assessment of this indicator is based on your response to [PE 09.2].

Indicator scoring methodology		
Selected response	**Level score**	**Further Details**
Indicator scoring methodology		
0% or <10%	○	
10–50% of portfolio companies	★	
51–90% of portfolio companies	★★	
>90% of portfolio companies	★★★	

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PE 10	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 2

PE 10	INDICATOR	
PE 10.1	Indicate if your organisation tracks the proportion of your portfolio companies that have an ESG/sustainability-related policy (or similar guidelines).	
	❍ Yes	❍ No
PE 10.2	Indicate what percentage of your portfolio companies has an ESG/sustainability policy (or similar guidelines).	
	❍ >90% of portfolio companies ❍ 51-90% of portfolio companies ❍ 10-50% of portfolio companies ❍ <10% of portfolio companies ❍ 0% of portfolio companies (in terms of total number of portfolio companies)	
PE 10.3	Additional information [OPTIONAL]	

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PE 10	EXPLANATORY NOTES
PE 10.1	Report 'Yes' even if you track a sub-set of all portfolio companies' ESG/sustainability-related policy.
PE 10.2	Determine the proportion by the number of all portfolio companies. ESG/sustainability policy refers to an overall statement, stand-alone or integrated into other policies, of how portfolio companies approach relevant ESG issues in their strategy, targets, operations and/or reporting practice. Such a policy will normally address relevant E, S and/or G issues and outline the commitments and/or activities that the portfolio company undertakes to address them. Include portfolio companies that already have appropriate ESG/sustainability policies, operations and/or targets and in which your organisation considers that necessary actions have been taken to integrate ESG issues. These types of actions can have different levels of significance when it comes to implementation, depending on individual portfolio companies' need to manage and improve ESG performance.
PE 10.3	Portfolio assets/companies are often at different levels of development, and their progress towards incorporating ESG issues within their policies and operations may differ. For example, some companies may even have been acquired due to their poor ESG performance (on the basis that any improvement in this area may create growth opportunities and potentially increase value). You may highlight how these kinds of variations affect your reported information.
LOGIC	
PE 10	[PE 10] is applicable if 'Yes' is reported in [PE 09.1]. [PE 10.2] will be applicable if "Yes" is reported in [PE 10.1].
ASSESSMENT	
PE 10	Maximum score: Three ★ The assessment of this indicator is based on your response to [PE 10.2].

Indicator scoring methodology

Selected response	Level score	Further Details
0% or <10%	⭘	
10–50% of portfolio companies	★	
51–90% of portfolio companies	★★	
>90% of portfolio companies	★★★	

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PE 11	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PRI 2

PE 11	INDICATOR	
PE 11.1	Indicate the types of actions taken by your portfolio companies to incorporate ESG issues into operations and what proportion of your portfolio companies has implemented these actions.	
	Types of actions taken by portfolio companies	**Implemented by percentage of portfolio companies**
	❑ Allocate responsibility for ESG issues to board/senior management	❍ >90% of portfolio companies ❍ 51-90% of portfolio companies ❍ 10-50% of portfolio companies ❍ <10% of portfolio companies ❍ We do not track this information. (in terms of total number of portfolio companies)
	❑ Composition of board ensures ESG expertise	[same as above]
	❑ Consider ESG issues in risk management processes	[same as above]
	❑ Define performance targets for applicable ESG issues in operations	[same as above]
	❑ Identify and engage external parties or stakeholders that could add value or decrease risk through ESG issues	[same as above]
	❑ Developing/implementing an environmental/social management system (ESMS) or similar	[same as above]
	❑ Other actions; specify _____	[same as above]
	❑ None of the above	
PE 11.2	Describe how your organisation contributes to the portfolio companies' resourcing and management of ESG issues.	

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PE 11	EXPLANATORY NOTES
PE 11.1	Determine the proportion by the number of all portfolio companies.
PE 11.2	The type of activities undertaken can range from individual engagements with boards and/or with senior management to sharing best management practice in a workshop format attended by a number of portfolio companies. This description could cover how ESG risks and/or opportunities in general have been incorporated by your portfolio companies as a result of your ownership activities and influence (if tracked). Portfolio assets/companies are often at different levels of development, and their progress towards incorporating ESG issues within their policies and operations may differ. For example, some companies may even have been acquired due to their poor ESG performance (on the basis that any improvement in this area may create growth opportunities and potentially increase value). You may highlight how these kinds of variations affect your reported information. The content of this indicator overlaps with: • PRI LP Responsible Investment DDQ 3.3, 3.4, 3.5 • PRI Monitoring/Reporting guidance 2.2
LOGIC	
PE 11	[PE 11] is applicable if 'Yes' is reported in [PE 09.1].
ASSESSMENT	
PE 11	Maximum score: Three ★ The assessment of this indicator is based on your response to [PE11.1].

Indicator scoring methodology		
Selected response	**Level score**	**Further Details**
No actions taken by portfolio companies	○	
One action more than 0% implemented	★	
Two or more actions more than 10% implemented	★★	
Three actions or more than 50% implemented	★★★	

PE 11	DEFINITIONS
Environmental/Social Management System	A management system (both formal and informal) consisting of procedures, management commitment, delineation of roles and responsibilities and guidance followed to review and manage the E&S issues and risks.

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PE 12	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle PRI 2,3

PE 12	INDICATOR	
PE 12.1	Indicate the type and frequency of reports you request and/or receive from portfolio companies covering ESG issues.	
	Type of reporting	**Typical reporting frequency**
	❑ Overarching portfolio company reports (or similar) in which management disclosure, financial and ESG data are integrated	❍ Quarterly or more frequently ❍ Biannually ❍ Annually ❍ Less frequently than annually ❍ Ad hoc/when requested; specify_____
	❑ Stand-alone reports highlighting targets and/or KPIs covering ESG issues	[same as above]
	❑ Other; specify _____	[same as above]
	❑ No reporting on ESG issues requested and/or provided by portfolio companies	
PE 12.2	Describe what level of reporting you require from portfolio companies, and indicate what percentage of your assets are covered by ESG reporting.	

PE 12	**EXPLANATORY NOTES**
PE 12	This indicator seeks information about how you ask portfolio companies to measure their ESG efforts and report this information.. The content of this indicator overlaps with: • PRI LP Responsible Investment DDQ 3.2.
PE 12.2	You may include a description and discussion of: • The nature of the ESG information that your organisation requests from portfolio companies • Whether some types of ESG information are requested more frequently than others • Whether the format of information is based on internal or external standards, metrics or templates. External templates and guidance for portfolio companies could include those of the International Finance Corporation (IFC), Global Reporting Initiative (GRI) and the United Nations Global Compact (UNGC) • Whether you believe your interests are best served by asking portfolio companies to integrate material information into one report or if you prefer receiving separate reports.
LOGIC	
PE 12	[PE 12] is applicable if 'Yes' is reported in [PE 09.1].

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PE 13	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PRI 2

PE 13	INDICATOR
PE 13.1	Indicate whether during the reporting year your organisation disclosed information on ESG issues to potential buyers prior to exit for private equity investments. ❍ We included ESG issues in pre-exit information. ❍ We did not include ESG issues in pre-exit information. ❍ N/A, we did not have any exits in the reporting year.
PE 13.2	Apart from disclosure, describe how your organisation considers ESG issues at exit.
PE 13.3	Additional information.

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PE 13	EXPLANATORY NOTES
PE 13	This indicator aims to capture whether portfolio companies' ESG performance during ownership, based on what is considered relevant, and its related value is disclosed to potential buyers. Determine the proportion by the number of all ongoing and finalised exits in the reporting year. The content of this indicator overlaps with: • PRI LP Responsible Investment DDQ 3.6
PE 13.2	You may include a discussion of how you consider ESG issues at exit, beyond disclosure to buyers, that for example includes: • Due diligence on potential buyers (e.g., its ESG track record, policies and management, adherence to international standards and codes covering ESG issues, legal and money laundering issues) • The intent of and alignment of interests with potential buyers (e.g., whether a buyer will change the ESG strategy of the portfolio company) • Analysis of potential conflicts of interest at exit • Assessment of the impact on employees, local communities and local environment of the exit; and/or • The transparency of the deal structure and reputational risk (e.g., the exit will trigger media attention) You may also comment on whether ESG considerations at exit are determined by the mandate and who, internally and externally, is involved with ESG issues when exiting investments.
ASSESSMENT	
PE 13	Maximum score: Three ★ The assessment of this indicator is based on your response to [PE 13.1].

Indicator scoring methodology

Selected response	Level score	Further Details
'N/A, we did not have any exits in the reporting year'	N/A	
'We did not include ESG issues in exit information'	⭘	
'We included ESG issues in pre-exit information'	★★★	

PE 13	DEFINITIONS
Exit	Realisations of investments made by a fund. This will normally take the form of a sale or flotation (IPO) of the portfolio company.

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SECTION

Outputs and outcomes

PE 14	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PRI 1,2

PE 14	INDICATOR	
PE 14.1	Indicate whether your organisation measures how your approach to responsible investment in private equity investments has affected financial and/or ESG performance.	
	❑ We measure whether our approach to ESG issues impacts the financial performance of investments. ❑ We measure whether our approach to ESG issues impacts the ESG performance of investments. ❑ None of the above	
	Describe the impact on the following.	
	a) Financial performance of investments	❍ Positive ❍ Negative ❍ No impact
	b) ESG performance of investments	❍ Positive ❍ Negative ❍ No impact
PE 14.2	Describe how you are able to determine these outcomes.	

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PE 14	EXPLANATORY NOTES
PE 14	This indicator aims to capture the impact, positive or negative, of taking account and managing ESG issues on both financial and ESG performance. The impact could come from either pre-investment activities (e.g., selecting the best companies) or post-investment influencing. *Financial performance* Examples may include reduced operating expenses, improved net operating income (NOI), capitalized value, etc. Note that financial risk mitigation should also be included in this category. *ESG performance* This relates to tracking the performance of ESG risks and/or opportunities throughout the lifetime of a fund or individual investment. Examples may include water and energy efficiency improvements, reduction of waste, reduction of health and safety incidents, etc. Note that ESG risk mitigation should also be included in this category. The content of this indicator overlaps with: • PRI LP Responsible Investment DDQ 3.7
PE 14.2	Describe how you measure the impact of ESG issues on financial returns, risks and/or ESG performance. You are strongly encouraged to report on carbon benchmarking, if this is undertaken. You are encouraged to specify the ESG issues (e.g., greenhouse gas emissions, water consumption) and financial measures you use to assess performance and to comment on any practical issues in using these measures in your processes.
LOGIC	
PE 14	[PE 14.2] will be applicable if you indicate that you measure whether ESG issues affect funds' financial performance, risk/volatility or ESG performance. Only relevant rows will be applicable.
ASSESSMENT	
PE 14	Maximum score: Three ★ The assessment of this indicator is based on your response to [PE 14.1].

Indicator scoring methodology

Selected response	Level score	Further Details
'No'	⭘	
Measure EITHER financial or ESG performance	★★	
Measure financial AND ESG performance	★★★	

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PE 15	Indicator status MANDATORY TO REPORT, VOLUNTARY TO DISCLOSE	Purpose DESCRIPTIVE	Principle PRI 1,2

PE 15	INDICATOR				
PE 15.1	Provide examples of ESG issues that you identified in your potential and/or existing private equity investments during the reporting year.				
	Investment Stage	**ESG issues**	**Sector(s)**	**Impact (or potential impact) on the investment**	**Activities undertaken to influence the investment and its response**
	Drop down list: [Initial screening, Due diligence, Investment decision, Investment monitoring, Prior to exit]				
PE 15.2	Describe how you define and evaluate the materiality of ESG factors				

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PE 15	EXPLANATORY NOTES
PE 15.1	*ESG issues* Please report on either ESG risks or opportunities. *Impact (or potential impact) on the investment* Please report on the financial, reputational and/or ESG-related (potential) impact *Activities undertaken to influence the investment and its response* Describe briefly how your organisation directly or indirectly tried to influence the investment (i.e., portfolio company) to take appropriate actions. You may outline who was involved and the rationale and objective of the action. The action will inevitably depend on how ESG issues are addressed by your organisation's ownership activities and also by your ability to influence the investment, given ownership stake, governance rights, etc. Describe how the investment responded to your organisation's suggested actions and (if applicable) how their policies and operations were used to address identified ESG issues. The number of examples that you will be able to provide will depend on how ESG issues are incorporated into your investment processes and monitoring activities. As far as practicable, these examples should focus on your most material examples of how ESG issues are incorporated. Please note that you are not expected to name companies. The content of this indicator overlaps with: • PRI LP Responsible Investment DDQ 2.1 • PRI Monitoring/Reporting guidance 2.1

EXAMPLE

ESG issues	Sector(s)	Impact (or potential impact) on the investment	Activities undertaken to influence the investment and its response
Environmental	Manufacturing	Groundwater pollution identified potential future increased financial and environmental risks	An action plan was created, and mitigation actions were started.

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SECTION

Communication

PE 16	Indicator status MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	Purpose DESCRIPTIVE	Principle PRI 6

PE 16	INDICATOR
PE 16.1	Describe your organisation's approach to disclosing ESG incidents in private equity investments to your investor clients (LPs).

PE 16	EXPLANATORY NOTES
PE 16.1	You may include a discussion of: • Policy and procedures followed if an incident occurs and how you inform the investor • The types of incidents or events that determine whether you consider it appropriate to disclose it to the investor immediately, or as soon as reasonably practical • The types of disclosure investors could expect to get in the event of a significant incident or event • Whether certain circumstances will trigger the investors to discuss ESG issues with investment professionals and/or portfolio company management • How portfolio companies to report ESG incidents to you • How you assess the incident and the actions required to address it • How you communicate that incident and actions to the LP. • Describe the types of disclosure that an LP could expect to get at the time of an incident, during its management and after it has been resolved (taking into account related confidentiality considerations) The content of this indicator overlaps with: • PRI LP Responsible Investment DDQ 4.3 • PRI Monitoring/Reporting guidance 3.1, 3.2
LOGIC	
PE 16	[PE 16] relates specifically to communication and incident reporting to investor clients. It is therefore applicable only to general partners (GPs)/PE fund managers. It is not applicable for co-investing asset owners (AOs)/limited partners (LPs).

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PRI REPORTING FRAMEWORK 2019
Direct Property

November 2018

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UNEP Finance Initiative
Changing finance, financing change

United Nations Global Compact

An investor initiative in partnership with UNEP Finance Initiative and UN Global Compact

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 identify which indicators are relevant for your organisation.

Key information about each indicator is highlighted in the top bar, including the indicator status (mandatory or voluntary), the purpose of the indicator and which PRI Principle it relates to.

xxx 01	Indicator status *MANDATORY*	Purpose *CORE ASSESSED*	Principle *PRI 2*

Indicator Status

MANDATORY	Mandatory indicators reflect core practices. These responses will be made public and must be completed to submit the framework.
MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	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.
VOLUNTARY	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.
Peering	These indicators are used to determine your peer groups for assessment purposes.
Core assessed	These indicators form the core of the assessment and represent the majority of your final assessment score.
Additional assessed	These indicators represent more advanced or alternative practices and contribute to a smaller part of your score.
Descriptive	These are open-ended narrative indicators, allowing you to describe your activities.

Underneath the Indicator

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

xxx 01	*EXPLANATORY NOTES*
xxx 01.1	This provides guidance on how to interpret the sub-indicators, including examples of what could be reported.
xxx 01.2	
LOGIC	
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.
ASSESSMENT	
xxx 01	This provides a brief overview of the pilot assessment approach for this indicator.
xxx 01	*DEFINITIONS*
xxx 01	Specific terms that are used in the indicator are defined here.

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PRI Principles for Responsible Investment

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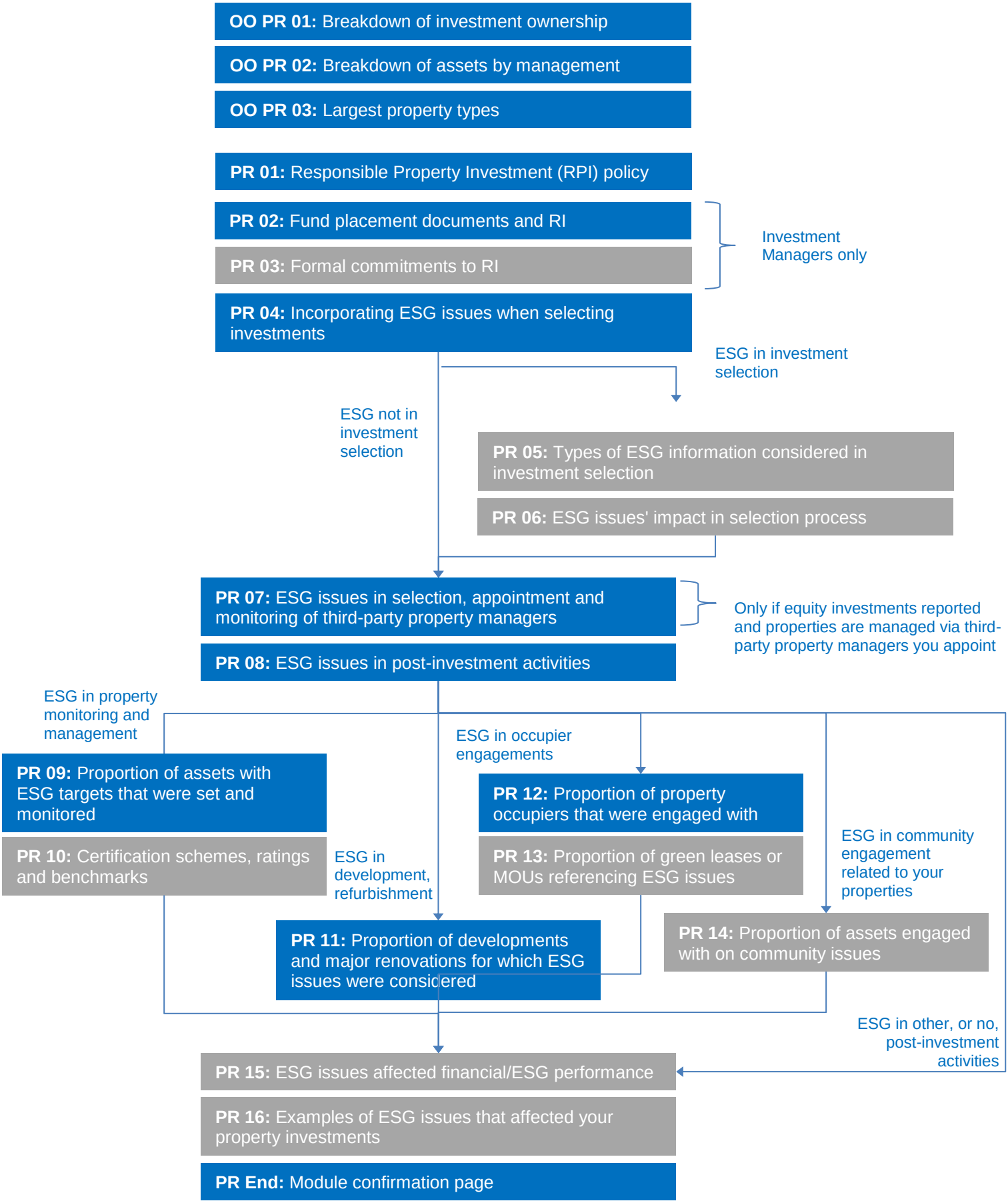

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PRI Principles for Responsible Investment

Preface

This module seeks information from investors that invest directly, either individually or with other investors, in property via non-listed equity. The investments can be both direct in physical property assets and in non-listed property management companies in which you are significantly involved in investment decisions and monitoring of underlying property assets.

The module seeks information about your organisation's ownership of property assets by type and value and how these assets are managed. It enables direct property investors to report how they apply their responsible property investment (RPI) policy, strategy and processes to investment selection, monitoring and management. 'Property management' refers to the operation and day-to-day management of property assets.

If you invest in non-listed property funds or fund-of-funds via external managers, you should not report in this module but instead use the *Indirect—Manager Selection, Appointment and Monitoring (SAM)* module. If you invest in the listed equity of property management companies, you should report in the *Direct—Listed Equity Incorporation (LEI)* and *Direct—Listed Equity Active Ownership (LEA)* modules in the same way as you report all your other listed equity investments.

Investments into real estate investment trusts (REITS) should be reported in this module.

This module refers to ESG issues in property investment selection and monitoring processes and activities to ensure alignment with terminology generally used by the PRI. The term "sustainability" is often used by property initiatives, surveys and codes. Sustainability in property investment may, depending on the context and area of focus, partially or fully overlap with ESG issues.

Some indicators in this module also overlap, partially or fully, with the Global Real Estate Sustainability Benchmark (GRESB); see link to assessment. Please note that this module seeks information at the organisational level and for your property investments in aggregate, not at a fund level.

The module has two main sections:

- pre-investment processes, i.e., initial screening, due diligence and investment decision-making processes that your organisation has in place for new property investments
- post-investment processes, i.e., consideration of ESG issues in property investment monitoring and implementation processes. The potential activities you may undertake in relation to property assets have been divided into four areas: property management, developments and major renovations, occupier engagements and community engagements

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Summary of updates

2018 Indicator	Update summary
PR 04, PR 07, PR 12 & PR 14	Updated and aligned with the 2018 GRESB Real Estate Assessment
PR 07	The scoring methodology has changed to reflect the any proportion less than 50% but greater than 0% is 1 star.

To view a detailed summary of changes to the modules, please click here.

For any word limit in the module, please click here.

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SECTION

Overview

PR 01	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 1-6

PR 01	INDICATOR	
PR 01.1	Indicate whether your organisation has a Responsible Property Investment (RPI) policy.	
	❍ Yes	❍ No
PR 01.2	Provide a URL to or attach the document.	
	URL	Attachment
PR 01.3	Provide a brief overview of your organisation's approach to responsible investment in property, and how you link responsible investment in property to your business strategy. [Optional]	

PR 01	EXPLANATORY NOTES
PR 01.1	Policy documents come in a variety of forms and are sometimes referred to as principles or guidance. The RPI policy may be a standalone document or may be part of the organisation's overall responsible investment policy. The options in this indicator are complementary to GRESB indicator MA1 in the 'Sustainability Objectives' section of the 2018 GRESB assessment.
PR 01.2	Please list here any property policy document(s) even if you have already listed it/them in the *Strategy and Governance (SG))* module. At a minimum, respondents must provide either a URL or an Attachment. You may also provide both.
PR 01.3	You may include a description of your RPI policy's coverage for internally managed property investments and how It links to business strategy. You may also wish to address specific Environmental, Social and Governance issues included in your responsible investment approach to property. This may for instance include your take on climate change, energy efficiency and greenhouse gas emissions.
LOGIC	
PR 01	[PR 01.2] will be applicable if "Yes" is reported in [PR 01.1].
ASSESSMENT	
PR 01	Maximum score: Three ★

Indicator scoring methodology

Selected response	Level score	Further Details
'No'	⭘	
'Yes'	★★★	

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PRI Principles for Responsible Investment

SECTION

Fund-raising of property funds

PR 02	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 1,4,6

PR 02	INDICATOR
PR 02.1	Indicate whether your most recent fund placement documents (private placement memorandums (PPMs) or similar) refer to responsible investment aspects of your organisation. ❍ Yes ❍ No ❍ Not applicable because our organisation does not fund-raise.
PR 02.2	Indicate how your fund placement documents (PPMs or similar) refer to the following responsible investment aspects of your organisation. ❑ Policy and commitment to responsible investment ❑ Approach to ESG issues in pre-investment processes ❑ Approach to ESG issues in post-investment processes
PR 02.3	Describe how your organisation refers to responsible investment for property funds in fund placement documents (PPMs or similar). [OPTIONAL]
PR 02.4	Explain why your organisation does not fund-raise.
PR 02.5	Additional information [OPTIONAL]

PR 02	EXPLANATORY NOTES
PR 02	This indicator covers the fundraising process of property funds in which relationship between the direct investor and the indirect investor client is established. A PPM or similar document issued by the direct investor about a particular fund can provide the recipient with a general sense of your approach to responsible investment and management of ESG issues. This indicator is applicable only for general partners and/or for direct fund managers. This is not applicable for asset owners. If this indicator is applicable to you but your organisation does not fund-raise, please select “Not applicable as our organisation does not fund-raise” and use indicator [INF 03.4] to explain why. If your organisation does fundraise but was not actively fundraising during the reporting year, please select the option that best represents your typical approach. As a general rule, this is the approach your organisation is likely to take during your next round of fundraising or what it included in your most recent round of fundraising.

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PR 02.3	You may include a discussion of your typical PPM's coverage: • Policy (e.g. reference to responsible investment and consideration of ESG issues throughout all investment stages) • Pre-investment (e.g. processes such as due diligence and the consideration of ESG issues in these) • Post-investment (e.g. ESG implementation programmes for portfolio companies, tracking achievements and identifying opportunities through monitoring processes, such as audits that consider ESG issues, until exit) Please report on any public placement documents and PPMs issued recently, not necessarily during the reporting year.
LOGIC	
PR 02	[PR 02.2] and [PR 02.3] will be applicable if "Yes" is reported in [PR 02.1]. [PR 02.4] will be applicable if "Not Applicable" is reported in [PR 02.1]. [PR 03] will not be applicable if you report "Not applicable because our organisation does not fund-raise" in [PR 02.1].
ASSESSMENT	
PR 02	Maximum score: Three ★ If you report "Not applicable as our organisation does not fund-raise", this indicator will not form part of your score.

Indicator scoring methodology

Selected response	Level score	Further Details
Not applicable because our organisation does not fund-raise.	N/A	
'No'	○	
'Yes' AND one selection from policy, pre-investment or post-investment	★	
'Yes' AND two selections from policy, pre-investment or post-investment	★★	
'Yes' AND three selections from policy, pre-investment or post-investment	★★★	

PR 02	DEFINITIONS
Fund placement documents or Private Placement Memorandum (PPM)	A fund placement document or Private Placement Memorandum (PPM) provides a broad range of information to help potential investors learn about the firm and its investment strategy as well as the proposed summary terms and conditions of the investment opportunity. These types of documents are also known as an "Offering Memorandum". A private equity firm will issue fund placement documents or PPM to prospective limited partners/investors when it is attempting to raise capital through a fund offering.

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PR 03	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PRI 4

PR 03	INDICATOR
PR 03.1	Indicate whether your organisation makes formal commitments in fund formation contracts, Limited Partnership Agreements (LPAs) or in side letters relating to responsible investment in property when requested by clients. ❍ We always make formal commitment to responsible investment in fund formation contracts, LPAs or side letters. ❍ In a majority of cases, we make formal commitment to responsible investment in fund formation contracts, LPAs or side letters. ❍ In a minority of cases, we make formal commitment to responsible investment in fund formation contracts, LPAs or side letters. ❍ We do not make formal commitment to responsible investment in fund formation contracts, LPAs or side letters. ❍ We do not make formal commitments to responsible investment in fund formation contracts, LPAs or side letters because our clients do not ask us to do so.
PR 03.2	Additional information

PR 03	EXPLANATORY NOTES
PR 03	This indicator is applicable only for direct property fund managers. This is not applicable for asset owners.
PR 03.1	Fund formation contracts, Limited Partnership Agreements (LPAs) Formal commitments on responsible investment implementation and consideration of ESG issues can be requested by investors and included in fund formation contracts, LPAs and side letters. They can also be made in your investment strategy, guidelines and/or mandate, either in a dedicated paragraph or integrated across the document. This latter approach can eliminate the need for separate fund formation contracts, LPAs or side letters. Please report on any fund formation contracts, LPAs and side letters signed upon request from investors/AOs recently, not necessarily during the reporting year. Please note that a formal commitment can have different levels of significance when it comes to implementation. Even though a responsible investment policy is mentioned, it does not mean ESG issues will be implemented in operational processes.
PR 03.2	You may include a discussion of: • Description of your organisation's responsible investment commitments • Adoption and alignment of policies between direct and indirect investors in relationship to responsible investment and ESG issues • Exclusion of investments in certain areas, either based on a direct property investor's own suggestion or in accordance with the indirect investor's preferences • Processes in place to deliver approach towards responsible investment and consideration of ESG issues, both during pre- and post-investment (including exits) • Listing of specific E, S and G issues (e.g. climate change and remuneration, and how they will be dealt with (if required)) • Portfolio companies' undertaking in relationship to ESG issues

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	• How reporting on ESG issues will be carried out during the life of the fund(s) • How and when potential incidents among portfolio companies will be communicated to investors If your formal commitments to responsible investment in property exist through other mechanisms that have been described in the Strategy and Governance (SG) module, please refer to that reported information in this indicator.
LOGIC	
PR 03	[PR 03] will not be applicable if you report "Not applicable because our organisation does not fund-raise" in [PR 02.1].
ASSESSMENT	
PR 03	Maximum score: Three ★

Indicator scoring methodology		
Selected response	**Level score**	**Further Details**
We do not make formal commitments to responsible investment in fund formation contracts, LPAs or side letters because our clients do not ask us to do so	N/A	
We do not make formal commitment to responsible investment in fund formation contracts, LPAs or side letters	⭘	
In a minority of cases we make formal commitment to responsible investment in fund formation contracts, LPAs or side letters	★	
In a majority of cases we make formal commitment to responsible investment in fund formation contracts, LPAs or side letters	★★	
We always make formal commitment to responsible investment in fund formation contracts, LPAs or side letters	★★★	

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SECTION

Pre-investment (selection)

PR 04	Indicator status MANDATORY	Purpose GATEWAY/ CORE ASSESSED	Principle PRI 1

PR 04	INDICATOR	
PR 04.1	Indicate whether your organisation typically incorporates ESG issues when selecting property investments.	
	❍ Yes	❍ No
PR 04.2	Provide a description of your organisation's approach to incorporating ESG issues in property investment selection.	
PR 04.3	Indicate which E, S and/or G issues are typically considered by your organisation in the property investment selection process, and list up to three examples per issue.	

ESG issues	List up to three typical examples per E, S and G issue	Description [OPTIONAL]
❑ Environmental	[Dropdown list] Climate change adaptation, Contamination, Energy efficiency, Energy supply, Flooding, GHG emissions, Indoor environmental quality, Natural hazards, Resilience, Transportation, Water efficiency, Waste management, Water supply, Other, Other, (Name all the options in the dropdown according to above examples)	
	Same as above	
	Same as above	
	[Dropdown list] Building safety and materials, Health, safety	

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	❑ Social	and wellbeing, Socio-economic, Accessibility, Affordable Housing, Occupier Satisfaction, Other, Other, Other (Name all the options in the dropdown according to above examples)	
		Same as above	
		Same as above	
	❑ Governance	[Dropdown list] Anti-bribery & corruption, Board structure, Conflicts of interest, Governance structure, Regulatory, Shareholder structure & rights, Supply chain governance, Other, Other ,Other (Name all the options in the dropdown according to above examples)	
		Same as above	
		Same as above	
PR 04.4	Additional information [OPTIONAL]		

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PR 04	EXPLANATORY NOTES
PR 04	This gateway indicator allows you to report whether your organisation incorporates ESG issues when selecting investments. The details of your processes will be captured in subsequent indicators. The options in this indicator are complementary to GRESB indicator RO3 in the 'Environmental & Social' section of the 2018 GRESB Real Estate Assessment.
PR 04.2	Describe your approach in terms of the different stages leading up to the investment decision. This may include a discussion of: • Whether the incorporation of ESG issues in pre-investment is determined by client mandates and, in that case, how it has been structured • How ESG issues, short- and long-term, are incorporated into the pre-investment process • How you assess risks and opportunities that may affect or result from your real estate investment decisions" • Any differences in how ESG issues are taken into account in different sectors and in different geographic regions • How your approach to ESG issues differs between investment strategies or within strategies with significant variations For further guidance refer to UNEP FI's Sustainable Real Estate Investment: Implementing the Paris Agreement, An Action Framework, p.35. *Scope* This indicator covers all stages of your pre-investment decision-making process (initial screening, due diligence, investment decision).

LOGIC	
PR 04	[PR 05 - PR 06] will be applicable if you report "Yes" in [PR 04.1]. [PR 05 - PR 06] will not be applicable if you report "No" in [PR 04.1] [PR 04.2] will be applicable if "Yes" is reported in [PR 04.1].

ASSESSMENT			
PR 04	Maximum score: Three ★		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	No ESG issues typically considered	⭘	
	One E, S or G issue typically considered	★	Including if 'other' is selected
	Two E, S or G issues typically considered	★★	Including if 'other' is selected
	All three ESG issues typically considered	★★★	Including if 'other' is selected

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PR 05	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PRI 1,3

PR 05	INDICATOR
PR 05.1	Indicate what type of ESG information your organisation typically considers during your property investment selection process. ❑ Raw data from the target property asset/company ❑ Appraisals/audits ❑ Benchmarks/ratings against similar property asset ❑ Country level data/benchmarks ❑ Data aligned with established property reporting standards, industry codes and certifications ❑ International initiatives, declarations or standards ❑ Data from engagements with stakeholders (e.g. tenants and local community surveys) ❑ Information from external advisers ❑ Other; specify _____ ❑ We do not track this information
PR 05.2	Provide a brief description of how this ESG information was incorporated into your investment selection process.

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PR 05	EXPLANATORY NOTES
PR 05.2	This may include a discussion of: • Measuring how these factors impact on real estate investment performance and how they influence real estate market fundamentals • Capturing the value of property level sustainability investment at the fund or corporate level, and adopting internal investment models to integrate ESG and climate risks considerations in the assessment of value • Providing valuers with building sustainability characteristics information • Collaborating with valuers to incorporate sustainability data as part of the standard valuation assessments • Considering the impact on a property's likelihood to command top market rents, become vacant, remain vacant, and other market fundamentals that drive value • Requesting valuers' opinion on risk posed by the sustainability characteristics of buildings, according to RICS rules For further guidance refer to UNEP FI's Sustainable Real Estate Investment: Implementing the Paris Agreement, An Action Framework, p.39. This may also include a discussion of: • sources of information on ESG issues that you frequently use • whether there is a difference between the sources used by internal and external advisors • whether your organisation keeps records of ESG information considered in the investment selection process
LOGIC	
PR 05	[PR 05] is applicable if "Yes" is reported in [PR 04.1].
ASSESSMENT	
PR 05	Maximum score: Three ★

Indicator scoring methodology		
Selected response	**Level score**	**Further Details**
'We do not track this information'	○	
1–2 selections	★	Including if 'other' is selected
3–4 selections	★★	Including if 'other' is selected
More than 4 selections	★★★	Including if 'other' is selected

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PR 06	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 1

PR 06	INDICATOR
PR 06.1	Indicate whether ESG issues impacted your property investment selection process during the reporting year. ❑ ESG issues helped identify risks and/or opportunities for value creation. ❑ ESG issues led to the abandonment of potential investments. ❑ ESG issues impacted the investment in terms of price offered and/or paid. ❑ ESG issues impacted the terms in the shareholder/purchase agreements and/or lending covenants. ❑ ESG issues were considered but did not have an impact on the investment selection process. ❑ Other; specify _____ ❑ Not applicable, our organisation did not select any investments in the reporting year ❑ We do not track this potential impact. Please explain _____
PR 06.2	Indicate how ESG issues impacted your property investment deal structuring processes during the reporting year. ❑ ESG issues impacted the investment in terms of price offered and/or paid. ❑ ESG issues impacted the terms in the shareholder/purchase agreements and/or lending covenants. ❑ ESG issues were considered but did not have an impact on the deal structuring process. ❑ Other; specify _____ ❑ Not applicable, our organisation did not select any investments in the reporting year ❑ We do not track this potential impact. Please explain _____
PR 06.3	Additional information [OPTIONAL]

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PR 12	EXPLANATORY NOTES		
PR 06.3	You are encouraged to generalise your impact measures, analysis and conclusions across different property investment selection processes and not to report every single deal and its individual characteristics. Indicator [PR 16] will allow your organisation to provide specific examples. "ESG issues were considered but did not have an impact on the investment selection process" refers to situations in which no ESG issues were identified or in which ESG issues were considered during the investment selection but were considered to be below the materiality threshold and therefore did not impact the investment.		
LOGIC			
PR 06	[PR 06] is applicable if "Yes" is reported in [PR 04.1].		
ASSESSMENT			
PR 06	Maximum score: Three ★		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	'Not applicable'	N/A	
	'We do not track this potential impact' in PR 06.1 and PR 06.2.	⭘	
	One selection in either PR 06.1 OR PR 06.2.	★	Including if 'other' is selected
	At least one selection in PR 06.1 AND PR 06.2.	★★	Including if 'other' is selected
	At least three selections from PR 06.2 AND PR 06.2.	★★★	Including if 'other' is selected

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SECTION

Selection, appointment and monitoring third-party property managers

PR 07	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 4

PR 07	INDICATOR	
PR 07.1	Indicate whether your organisation includes ESG issues in your selection, appointment and/or monitoring of third-party property managers.	
	❍ Yes	❍ No

PR 07.2 Indicate how your organisation includes ESG issues in your selection, appointment and/or monitoring of third-party property managers.

Selection/appointment/ monitoring	Types of actions	Coverage
❑ Selection process of property managers incorporates ESG issues.	❑ Request explanation of how ESG is effectively integrated, including inquiries about governance and processes ❑ Request track records and examples of how the manager implements ESG in their asset and property management ❑ Discuss property level out-performance opportunities through greater integration of ESG criteria ❑ Request explanation of engaging stakeholders on ESG issues ❑ Other, explain	❍ >75-100% ❍ >50-75% ❍ <50%
❑ Contractual requirements when appointing property managers includes ESG issues.	❑ Include clear and detailed expectations for incorporating ESG ❑ Require dedicated ESG procedures in all relevant asset and property management phases ❑ Clear ESG reporting requirements ❑ Clear ESG performance targets ❑ Other, explain	❍ >75-100% ❍ >50-75% ❍ <50%
❑ Monitoring of property managers covers ESG responsibilities and implementation.	❑ Performance against **quantitative** and material environmental / resource targets over specified timeframe. ❑ Performance against **quantitative** and material environmental / resource targets against relevant benchmarks ❑ Performance against **quantitative** and **qualitative** targets to address social impacts of the portfolio/investment. ❑ Other, explain	❍ >75-100% ❍ >50-75% ❍ <50%

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PR 07.3	Provide a brief description of your organisations selection, appointment and monitoring of third party property managers and how they contribute to the management of ESG issues for your property investments**.**

PR 07	**EXPLANATORY NOTES**
PR 07	This section is applicable only if your organisation outsources property management to third-party property managers as reported in OO, aligned with GRESB 2018 guidance. See OO for definitions. If you manage all properties in-house, this indicator will not be applicable. If you manage some properties in-house and outsource some, you should report only about those assets for which management is outsourced.
PR 07.3	*Selecting property managers* This may include a discussion of how your selection processes for property managers is structured. *Appointing property managers* This may include a discussion of: • Type of ESG responsibilities, implementation requirements and measures in contractual agreements • How the implementation of ESG issues was formally agreed upon (if applicable) *Monitoring property managers* This may include a discussion of: • Your typical interaction with property managers • Whether you make regular property visits • To what extent your interactions include discussions of ESG initiatives • Whether there are variations across different managers in the monitoring that you carry out • Whether you have a performance evaluation and incentive system based on ESG issues for your property managers For further guidance, refer to UNEP FI's Sustainable Real Estate Investment: Implementing the Paris Climate Agreement, An Action Framework, p. 45.
LOGIC	
PR 07	[PR 07] will be applicable if you reported in [OO PR 02.1] that some proportion of your property assets are 'managed via third-party property managers you appointed'. [PR 07.2] will be applicable if 'Yes' is reported in [PR 07.1].
ASSESSMENT	
PR 07	Maximum score: Nine ★ This indicator is only assessed for organisations that outsource management. For those organisations that do not outsource management, it is N/A and removed from your denominator.

Indicator scoring methodology		
Selected response	**Level score**	**Further Details**
PR 07.2a – Selection process of property managers incorporates ESG issues.		
Not Selection process of property managers incorporates ESG issues.	○	

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	<50%	★	
	>50 – 75%	★★	
	>75 – 100%	★★★	
	PR 07.2b - Contractual requirements when appointing property managers includes ESG issues.		
	Not Contractual requirements when appointing property managers includes ESG issues.	○	
	<50%	★	
	>50 – 75%	★★	
	>75 – 100%	★★★	
	PR 07.2c- Monitoring of property managers covers ESG responsibilities and implementation.		
	Not Monitoring of property managers covers ESG responsibilities and implementation.	○	
	<50%	★	
	>50 – 75%	★★	
	>75 – 100%	★★★	

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SECTION

Post-investment (monitoring and active ownership)

OVERVIEW

PR 08	Indicator status	Purpose	Principle
	MANDATORY	GATEWAY	PRI 2

PR 08	INDICATOR	
PR 08.1	Indicate whether your organisation and/or property managers consider ESG issues in post-investment activities relating to your property assets.	
	❍ Yes	❍ No
PR 08.2	Indicate whether your organisation and/or property managers consider ESG issues in the following post-investment activities relating to your property assets.	
	❑ We consider ESG issues in property monitoring and management. ❑ We consider ESG issues in property developments and major renovations. ❑ We consider ESG issues in property occupier engagements. ❑ We consider ESG issues in community engagements related to our properties. ❑ We consider ESG issues in other post-investment activities; specify_____	
PR 08.3	Describe how your organisation and/or property managers consider ESG issues in post-investment activities related to your property assets.	

PR 08	EXPLANATORY NOTES
PR 08	This indicator refers to the consideration of ESG issues in active property monitoring and management processes and activities.
PR 08.2	If you have a policy and procedures to address ESG issues in the development and refurbishment of your assets but did not apply it in the reporting year since no developments and major renovations of property assets were ongoing, you should still select 'We consider ESG issues in property development and major renovations'.

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PR 08.3	You may outline how you consider ESG issues, such as climate change and energy efficiency, in the different areas and associated activities. For example, you can describe whether your organisation, your property managers and/or your joint venture partners have the main responsibility for the different areas of property investment monitoring and implementation. If you are a minority investor, your description can cover how you influence partners and/or their property managers to consider ESG issues in their monitoring and management processes and activities. You may want to include ESG considerations such as: • Environmental site selection requirements • Environmental site development requirements • Sustainable construction materials • Water efficiency requirements • Energy efficiency requirements • Energy generation from on-site renewable sources • Waste management plans at sites • Health and safety management systems at sites • Construction contractors comply with sustainability guidelines • Resilient building design and orientation You may also outline whether you have specific guidelines by which operating programmes, plans and short- or long-term goals for these activities are captured and described. More details per area of implementation can be reported in respective sub-section [09-20].
LOGIC	
PR 08	[PR 08.2] and [PR 08.3] will be applicable if you report "Yes" in [PR 08.1]. [PR 09 - PR 14] will not be applicable if you report "No" in [PR 08.1].
PR 08.2	[PR 09] and [PR 10] will be applicable if "We consider ESG issues in property monitoring and management" is selected. [PR 11] will be applicable if "We consider ESG issues in property developments and major renovations" is selected. [PR 12] and [PR 13] will be applicable if "We consider ESG issues in property occupier engagements" is selected. [PR 14] will be applicable if "We consider ESG issues in community engagements related to our properties".
Assessment	
PR 08	This indicator is not assessed but a 'No' response in [PR 08.1] will result in a zero score for the whole of the post-investment section. In [PR 08.2], if you report that you do not consider ESG in the 'property monitoring and management', 'property developments and major renovations', 'property occupier engagements' and/or 'community engagements related to our properties'' you will receive a zero score for that sub-section.

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PROPERTY MONITORING AND MANAGEMENT

PR 09	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 2,3

PR 09	INDICATOR
PR 09.1	Indicate the proportion of property assets for which your organisation and/or property managers set and monitored ESG targets (KPIs or similar) during the reporting year. ❍ >90% of property assets ❍ 51-90% of property assets ❍ 10-50% of property assets ❍ <10% of property assets (in terms of number of property assets)
PR 09.2	Indicate which ESG targets your organisation and/or property managers typically set and monitor.

	Target/KPI	Progress Achieved
❑ Environmental		
❑ Social		
❑ Governance		

❑ We do not set and/or monitor against targets.

PR 09.3	Additional information [OPTIONAL]

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PR 09	EXPLANATORY NOTES
PR 09	This indicator aims to capture your and/or your property managers' approach to ESG performance in the active monitoring of your property assets. The type of monitoring activities undertaken can range from individual engagements on boards and/or with senior management to reviews of ESG information covering property assets/companies. The options in this indicator are complementary to GRESB indicator P15 in the 'Performance Indicators' section of the 2018 GRESB Real Estate Assessment.
PR 09.1	Select the proportion of your properties for which you and/or your property managers have set targets that cover at least one E, S or G issue and monitor performance towards achieving this target. For example, if your organisation has set energy efficiency targets for 40% of properties (by number) which for those same properties has set disability access targets in 20% of cases, you should still select the '10-50%' option. If instead your organisation has set energy targets for 40% of properties and for a different set of properties has set disability access targets in 20% of cases, you should select the '51-90%' option. Not encouraging, reviewing reports or participating in discussions around ESG issues should not be reported as monitoring. Please note that this indicator does not ask for a specific level of targets. The level of E, S and G targets that an organisation is able to set will vary depending on a number of factors such as their value add, risk reduction potential and financial performance targets. Determine the proportion based on the number of property assets.
PR 09.2	These may include: • Qualitative targets to have investment and asset management procedures in place, as well as tools to integrate ESG in climate risks in asset acquisition, management, operation, planning, new developments, refurbishment, upgrade, rental and occupier management; • Quantitative and material targets to reduce energy, carbon intensity, water and waste of the portfolio over specified timeframes; • Setting a goal to measure and reduce the environmental/ resource intensity of a portfolio against relevant benchmarks over a given time period; • Quantitative and qualitative targets to address social impacts of the portfolio, including community engagement and contribution to local communities; • Setting quantitative targets for the inclusion of green lease clauses in the lease agreements with tenants; • Target for a specified proportion of the fund's buildings to be powered by clean energy, to be highly energy efficient, to achieve minimum requirements for renovations, or to be "best in class" with respect to resource intensity; and / or • Periodic reports on progress against targets. For further guidance, refer to UNEP FI's Sustainable Real Estate Investment: Implementing the Paris Climate Agreement, An Action Framework, p. 36.
PR 09.3	Your description can cover how your organisation and/or your property managers approach ESG issues in property management. You can include a description of: • Your organisation's general approach to property management, consideration of ESG issues and particular areas of practise deemed appropriate for your stakeholders • How investment strategies influence your property management • How you set ESG targets and monitor performance for individual property assets • How you develop reliable tracking and benchmarking for different ESG issues • The geographical coverage of your property assets and whether your approach differs by location

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LOGIC			
PR 09	[PR 09] will be applicable if you reported in [PR 08.2] that your organisation considers ESG issues in property monitoring and management.		
ASSESSMENT			
PR 09	Maximum score: Three ★		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	0% or <10% of property assets	○	
	10 – 50% of property assets	★	
	51 – 90% of property assets	★★	
	>90% of property assets	★★★	

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PR 10	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle PRI 2

PR 10	INDICATOR	
PR 10.1	Indicate whether your property assets are assessed against certification schemes, ratings and/or benchmarks.	
	❍ Yes	❍ No
PR 10.2	List the certification schemes, ratings and/or benchmarks your property assets are assessed against and what proportion of your property assets they apply to.	
	Certification schemes, ratings and benchmarks	**Proportion of property assets these apply to**
	❑ Specify:_____	❍ >90% of property assets ❍ 51-90% of property assets ❍ 10-50% of property assets ❍ <10% of property assets (in terms of number of property assets)
	❑ Specify:_____	[same as above]
	❑ Specify:_____	[same as above]
PR 10.3	Indicate whether your organisation uses property specific reporting standards to disclose information related to your property investments' ESG performance.	
	❑ Global Reporting Initiative (GRI) Construction and Real Estate Sector Supplement (CRESS) ❑ Other property reporting standards; specify_____ ❑ No property specific reporting standards are used.	
PR 10.4	Additional information	

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PR 10	EXPLANATORY NOTES
PR 10	*Property rating and certification schemes* These may include Leadership in Energy and Environmental Design (LEED), Building Research Establishment Environmental Assessment Method (BREEAM), National Association of Home Builders (NAHBGreen) in the US, Comprehensive Assessment System for Built Environment Efficiency (CASBEE) in Japan, Haute Qualité Environnementale (HQE) in France, Minergie in Switzerland, Deutsches Gütesiegel Nachhaltiges Bauen (DGNB) in Germany, and/or Green Building Council of Australia's Green Star rating. *Property ratings by public agencies* These may include National Australian Built Environment Rating System (NABERS) in Australia and/or Energy Star in the US created by the Environmental Protection Agency (EPA). *Property benchmarks* These may include Greenprint Foundation, Green Rating Alliance, Global Real Estate Sustainability Benchmark (GRESB), International Sustainability Alliance (ISA) and/or IPD EcoPAS. The options in this indicator are complementary to GRESB indicator BC1.1 in the 'Building Certifications' section of the 2018GRESB Real Estate Assessment. Determine the proportion for each row of [PR 11.2] based on the number of property assets.
PR 10.3	This indicator aims to capture reporting using specific property standards, irrespective of whether these relate to a sub-set of funds or to the organisation as a whole.
PR 10.4	This may include greater information on your certification schemes, ratings and benchmarks and a discussion of your approach to property certification schemes, ratings and benchmarks. For example, you can describe: • Proportion of your property investments that have been assessed against certain standards • Variations in assessment results between ratings and accreditations (e.g., silver, gold, platinum or EPC label A-G) • Variations in ratings and accreditations across your portfolio in different countries • Resource constraints that may limit your possibilities of applying certification schemes, ratings or benchmarks (certifications can require resources and capital not available for all funds) • Whether existing and new properties are treated differently when it comes to use of ratings • Frequency of assessment
LOGIC	
PR 10	[PR 10] is applicable if you reported in [PR 08.2] that your organisation considers ESG issues in property monitoring and management. [PR 10.2] will be applicable if you report "Yes" in [PR 10.1].

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PROPERTY DEVELOPMENTS AND MAJOR RENOVATIONS

PR 11	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 2

PR 11	INDICATOR
PR 11.1	Indicate the proportion of active property developments and major renovations in which ESG issues have been considered. ❍ >90% of active developments and major renovations ❍ 51-90% of active developments and major renovations ❍ 10-50% of active developments and major renovations ❍ <10% of active developments and major renovations ❍ N/A, no developments and major renovations of property assets are active. (by number of active property developments and major renovations)
PR 11.2	Indicate whether the following ESG considerations are typically implemented and monitored in your property developments and major renovations. ❑ Environmental site selection requirements ❑ Environmental site development requirements ❑ Sustainable construction materials ❑ Water efficiency requirements ❑ Energy efficiency requirements ❑ Energy generation from on-site renewable sources ❑ Waste management plans at sites ❑ Health and safety management systems at sites ❑ Health and wellbeing of residents ❑ Construction contractors comply with sustainability guidelines ❑ Resilient building design and orientation ❑ Other; specify_____
PR 11.3	Additional information [OPTIONAL]

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PR 11	EXPLANATORY NOTES
PR 11.1	'Active' property developments or major renovations refer to those that are taking place during the reporting year. In line with GRESB definitions a major renovation is defined as: "Alterations that affect more than 50 percent of the total building floor area or cause relocation of more than 50 percent of regular building occupants. Major Renovation projects refer to buildings that were under construction at any time during the reporting period." Determine the proportion based on number of active property developments and major renovations.
PR 11.3	Your description may cover how your organisation approaches the incorporation of ESG issues into developments and major renovations. For example, you may comment on: • Whether your developments and major renovations aim to improve their ESG performance • Whether your managers (if applicable) have a duty to drive improvements in property sustainability performance • Drivers behind ongoing development and major renovation projects (e.g. investor client demand, economic benefit, occupier demand, future proofing against regulation, compliance with existing regulation or other) • Whether your organisation has ESG standards in place for contractors and how you ensure that contractors are compliant with these standards
LOGIC	
PR 11	[PR 11] is applicable if you reported in [PR 08.2] that your organisation considers ESG issues in property development and major renovations.
ASSESSMENT	
PR 11	Maximum score: Six ★

Indicator scoring methodology		
Selected response	**Level score**	**Further Details**
PR 11.1		
N/A, no developments and major renovations of property assets are active	N/A	
0% or <10% of active developments/ major renovations	○	
10 – 50% of active developments/ major renovations	★	
51 – 90% of active developments/ major renovations	★★	
>90% of active developments/ major renovations	★★★	
PR 11.2		
No ESG considerations	○	
1–2 ESG considerations	★	
3–4 ESG considerations	★★	
More than 4 ESG considerations	★★★	

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OCCUPIER ENGAGEMENT

PR 12	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 2

PR 12	INDICATOR
PR 12.1	Indicate the proportion of property occupiers your organisation and/or your property managers engaged with on ESG issues during the reporting year. ❍ >90% of occupiers ❍ 51-90% of occupiers ❍ 10-50% of occupiers ❍ <10% of occupiers (in terms of number of occupiers)
PR 12.2	Indicate whether the following practises and areas are typically part of your and/or your property managers' occupier engagements. ❑ Distribute a sustainability guide to occupiers ❑ Organise occupier events focused on increasing sustainability awareness ❑ Deliver training on energy and water efficiency ❑ Deliver training on waste minimisation ❑ Provide feedback on energy and water consumption and/or waste generation ❑ Provide feedback on waste generation ❑ Carry out occupier satisfaction surveys ❑ Health and wellbeing of residents ❑ Offer green leases ❑ Other; specify_____
PR 12.3	Additional information [OPTIONAL]

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PR 12	EXPLANATORY NOTES
PR 12.1	'Occupiers' refers to a person or group that occupies a house, office, industrial estate or similar. For the purpose of this module, 'occupiers' refer to tenants. For example, one occupier or tenant may have 200 employees or five residents. Please count the number of engagements as one per occupier, regardless of whether that particular occupier has 200 employees or five residents. Determine the proportion based on the number of occupiers.
PR 12.2	The options in this indicator are complementary to GRESB indicator SE7 in the 'Stakeholder Engagement' section of the 2018 GRESB Real Estate Assessment.
PR 12.3	You may describe how your organisation and/or your property managers engage with occupiers on ESG issues. Your description may include discussion of: • How your organisation selects occupiers for engagements • How your organisation communicates with occupiers • How your organisation ensures that occupiers understand the sustainability attributes of the buildings and spaces they occupy • Whether partnership agreements between your organisation and occupiers to work on certain ESG issues are in place Depending on the property type (office, retail, industrial, etc.), your ability to influence and engage certain occupiers might be challenging because the occupier has operational control. If applicable, please discuss this in your response to this indicator. For transparency purposes, PR 03 also gives you an opportunity to provide some context about which property types you have invested in.
LOGIC	
PR 12	[PR 12] will be applicable if you reported in [PR 08.2] that your organisation considers ESG issues in property occupier engagements.
ASSESSMENT	
PR 12	Maximum score: Three ★

Indicator scoring methodology

Selected response	Level score	Further Details
No occupier engagements OR <10% of occupiers	○	
10 – 50% of occupiers	★	
51 – 90% of occupiers	★★	
>90% of occupiers	★★★	

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PR 13	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PRI 2

PR 13	INDICATOR
PR 13.1	Indicate the proportion of all leases signed during the reporting year that used green leases or the proportion of Memoranda of Understandings (MoUs) with reference to ESG issues. ❍ >90% of leases or MoUs ❍ 51-90% of leases or MoUs ❍ 10-50% of leases or MoUs ❍ <10% of leases or MoUs ❍ 0% of leases or MoUs ❍ N/A, no leases or MoUs were signed during the reporting year. (in terms of number of leases or MoUs)
PR 13.2	Additional information

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PR 13	EXPLANATORY NOTES		
PR 13.1	Determine the proportion based on the total number of leases or MoUs signed during the reporting year.		
PR 13.2	This may include a discussion of your green leases and/or MoUs.		
LOGIC			
PR 13	[PR 13] will be applicable if you reported in [PR 08.2] that your organisation considers ESG issues in property occupier engagements		
ASSESSMENT			
PR 13	Maximum score: Three ★		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	N/A, no leases or MoUs were signed during the reporting year	N/A	
	0% OR <10% of leases or MoUs	○	
	10 – 50% of leases or MoUs	★	
	51 – 90% of leases or MoUs	★★	
	>90% of leases or MoUs	★★★	

PR 13	DEFINITIONS
Green lease	A green lease is a lease for a property that, within its terms or through an attached schedule, includes provisions that encourage the landlord, occupier or both to carry out their roles in a sustainable way. The details of the provisions and the means of encouraging sustainable behaviour are negotiated between the parties, but typically relate to the achievement of specific ESG targets (e.g., for energy, water use and waste management). Clauses in green leases may also include the use of sustainable materials when possible and sharing of environmental data between landlord and occupier.
Memorandum of Understanding (MoU)	An MoU provides a formal mechanism for landlords and occupiers to discuss issues that will be included in the lease agreement and is not necessarily legally binding. In this context, it may represent a starting point for both parties to incorporate ESG considerations in relationship to, for example, water or energy performance.

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COMMUNITY ENGAGEMENT

PR 14	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PRI 2

PR 14	INDICATOR
PR 14.1	Indicate what proportion of property assets your organisation and/or your property managers engaged with the community on ESG issues during the reporting year. ❍ >90% of property assets ❍ 51-90% of property assets ❍ 10-50% of property assets ❍ <10% of property assets (in terms of number of property assets)
PR 14.2	Indicate whether the following areas and activities are typically part of your and/or your property managers' community engagement. ❑ ESG education programmes for the community ❑ ESG enhancement programmes for public spaces ❑ Research and networking activities focusing on ESG issues ❑ Employment creation in communities ❑ Supporting charities and community groups ❑ Other; specify_____
PR 14.3	Additional information

PR 14	EXPLANATORY NOTES
PR 14.1	Determine the proportion based on the number of property assets.
PR 14.2	The options in this indicator are complementary to GRESB indicator SE11.1 in the 'Stakeholder Engagement' section of the 2018 GRESB Real Estate Assessment.
PR 14.3	'Community engagement' covers engagements with stakeholders located outside, but most often close to, properties, and generally includes members of the public. If you have dedicated community engagement programs, please specify the objectives of these programs in the community and the outcomes they typically intend to deliver. Your description could cover how your organisation, and/or your property managers: • Measure and monitor the impact of your community engagement programme • Whether your community engagements have led to significant changes and to what extent you and/or your property managers influenced these changes Depending on the property type, for example, offices, your ability to influence and engage the community might be challenging. If applicable, discuss this in your response to this indicator. For transparency purposes, the OO module also gives you an opportunity to provide some context about which property types you have invested in.

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LOGIC			
PR 14	[PR 14] will be applicable if you reported in [PR 08.2] that your organisation considers ESG issues in community engagements related to your properties		
ASSESSMENT			
PR 14	Maximum score: Three ★		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	No community engagements OR <10% of property assets	○	
	10 – 50% of property assets	★	
	51 – 90% of property assets	★★	
	>90% of property assets	★★★	

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SECTION

Outputs and outcomes

PR 15	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PRI 1,2

PR 15	INDICATOR	
PR 15.1	Indicate whether your organisation measures how your approach to responsible investment in property investments has affected financial and/or ESG performance. ❑ We measure whether our approach to ESG issues impacts funds' financial performance. ❑ We measure whether our approach to ESG issues impacts funds' ESG performance. ❑ None of the above	
PR 15.2	Describe the impact on the following.	
	a) Funds' financial performance	❍ Positive ❍ Negative ❍ No impact
	b) Funds' ESG performance	❍ Positive ❍ Negative ❍ No impact
PR 15.3	Describe how you are able to determine these outcomes.	

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PR 15	EXPLANATORY NOTES
PR 15	This indicator aims to capture whether you measure impact, positive or negative, of taking account and managing ESG issues on both financial and ESG performance. The impact could come from either pre-investment activities (e.g., selecting the best properties) or post-investment influencing. *Financial performance* Examples may include reduced operating expenses, improved net operating income (NOI), retention of existing tenants, attracted new tenants, capitalized value, etc. Note that financial risk mitigation should also be included in this category. *ESG performance* This relates to tracking the performance of ESG risks and/or opportunities throughout the lifetime of a fund. Examples may include water and energy efficiency improvements, reduction of waste, reduction of health and safety incidents, etc. Note that ESG risk mitigation should also be included in this category.
PR 15.2	Describe how you measure how the impact of ESG issues on financial returns, risks and/or ESG performance. You are strongly encouraged to report on carbon benchmarking, if this is undertaken. You are encouraged to specify the ESG issues (e.g., greenhouse gas emissions, water consumption) and financial measures you use to assess performance and comment on any practical issues in using these measures in your processes.
LOGIC	
PR 15	[PR 15.2] is applicable if you report that your organisation measures how ESG issues affect financial performance or ESG performance in [PR 15.1].
ASSESSMENT	
PR 15	Maximum score: Three ★

Indicator scoring methodology

Selected response	Level score	Further Details
Do not measure either	⭘	
Measure EITHER financial or ESG performance	★★	
Measure financial and ESG performance	★★★	

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PR 16	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle PRI 1,3

PR 16	INDICATOR			
PR 16.1	Provide examples of ESG issues that affected your property investments during the reporting year.			
	ESG issues	**Types of properties affected**	**Impact (or potential impact) on the investment**	**Activities undertaken to influence the investment and its response**
PR 16.2	Additional information			

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PR 16	EXPLANATORY NOTES
PR 16.1	*ESG issues* Refer to the definitions for ESG issues in the Main Definitions document. *Types of properties affected* For example: industrial estates, retail, office, residential, leisure/hotel, etc. *Impact (or potential impact) on the investment* The financial, reputational and/or ESG/sustainability-related impact (or potential impact) and at what stage in the investment process the ESG issues were identified (e.g., initial screening, due diligence, decision or investment monitoring) *Activities undertaken to influence the investment and the outcomes* Here you can describe your and/or your property managers' monitoring activities and the impact of your occupier and/or community engagements. The number of examples you provide will inevitably depend on exactly how you incorporate ESG issues into your investment processes. Organisations are encouraged to provide at least three and up to five examples. As far as practicable, these examples should be your most material examples of how ESG issues are incorporated.

EXAMPLES			
ESG issues	**Types of properties affected**	**Impact (or potential impact) on the investment**	**Activities undertaken to influence the investment and its response**
CO2 emissions	Non-commercial property with private tenants	Financial including cost of refurbishment and future operational cost of the building (e.g., heating and CO2 emissions)	Based on this, a decision was made to refurbish with high environmental standards in place.
Flood risk	Any type located in defined flood areas; more acute for those reliant on regular supply of goods	Lower demand because less desirable for occupiers due to potential business interruption, plus threat of future insurability	Accuracy of flood risk, liaison with environment agencies, future predictions for location, future plans for flood defences. Decided whether to pursue, pursue with conditions, or withdraw

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PRI REPORTING FRAMEWORK 2019
Direct — Infrastructure

November 2018

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UNEP Finance Initiative
Changing finance, financing change

United Nations Global Compact

An investor initiative in partnership with UNEP Finance Initiative and UN Global Compact

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 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), the purpose of the indicator and which PRI Principle it relates to.

	Indicator status	Purpose	Principle
xxx 01	*MANDATORY*	*CORE ASSESSED*	*PRI 2*

Indicator status

MANDATORY	Mandatory indicators reflect core practices. These responses will be made public and must be completed to submit the framework.
MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	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.
VOLUNTARY	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.
Peering	These indicators are used to determine your peer groups for assessment purposes.
Core assessed	These indicators form the core of the assessment, and represent the majority of your final assessment score.
Additional assessed	These indicators represent more advanced or alternative practices and contribute to a smaller part of your score.
Descriptive	These are open-ended narrative indicators, allowing you to describe your activities.

Underneath the indicator

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

xxx 01	*EXPLANATORY NOTES*
xxx 01.1	This provides guidance on how to interpret the sub-indicators, including examples of what could be reported.
xxx 01.2	
LOGIC	
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.
ASSESSMENT	
xxx 01	This provides a brief overview of the pilot assessment approach for this indicator.
xxx 01	*DEFINITIONS*
xxx 01	Specific terms that are used in the indicator are defined here.

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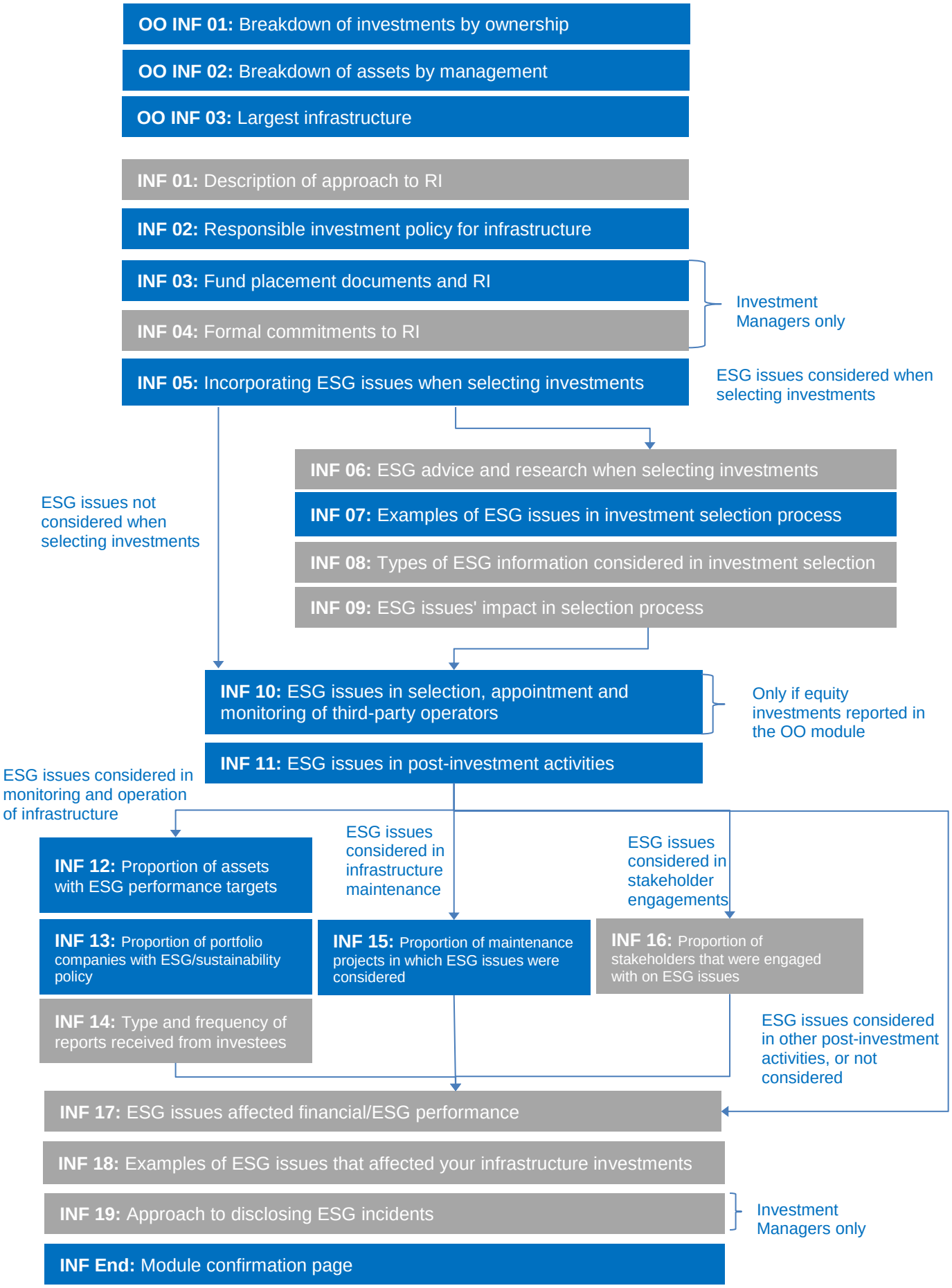
Pathways through the module



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PRI Principles for Responsible Investment

Preface

This module seeks information from investors that invest directly, either individually or with other investors, in infrastructure (physical underlying assets and operators/special purpose companies) via non-listed equity.

This module is voluntary to complete for all signatories during the 2019 reporting cycle while the PRI gathers additional information about approaches to responsible investment in this asset class.

Investors investing in non-listed infrastructure funds by selecting a general partner/manager or investing through funds of funds or non-listed infrastructure operators and development companies that also make investment decisions on their behalf should not report in this module but instead in the *Indirect—Manager Selection, Appointment and Monitoring (SAM) module.*

Investors investing in the listed equity of infrastructure operators and development companies should report in the *Direct—Listed Equity Incorporation (LEI)* and *Direct—Listed Equity Active Ownership (LEA)* modules in the same way as you report all your other listed equity investments.

This module will refer to E, S and G issues in infrastructure investment selection and monitoring. The term "sustainability" is sometimes used in relation to infrastructure by other initiatives, standards codes or similar. Sustainability in infrastructure investment may, depending on context and area of focus, partially or fully overlap with ESG issues.

The module has two main sections:

- pre-investment processes, i.e., initial screening, due diligence and investment decision-making processes that your organisation has in place for new infrastructure investments; and
- post-investment processes, i.e., consideration of ESG issues in infrastructure investment monitoring, active ownership and management processes. The potential activities you may undertake in relation to infrastructure assets have been structured into three areas: infrastructure monitoring and operations, maintenance and stakeholder engagements.

Summary of updates

The Infrastructure Module has not changed significantly since 2016. Peering indicators [INF 01 – 03] have been moved into the OO module, and subsequent INF indicators have been renumbered.

2018 Indicator	Update summary
INF 09	More options have been added.

To view a detailed summary of changes to the module, please click here.

For any word limit in the module, please click here.

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INF 01	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle PRI 1-6

INF 01	INDICATOR
INF 01.1	Provide a brief overview of your organisation's approach to responsible investment in infrastructure in which you have equity stakes.

INF 01	**EXPLANATORY NOTES**
INF 01	This indicator enables you to describe your organisation's responsible investment approach to infrastructure in which you take equity investments. Please describe only your direct investments in infrastructure. Investments in infrastructure funds managed by other managers on your behalf are captured in the *Indirect—Manager Selection, Appointment and Monitoring (SAM)* module.
INF 01.1	This may include a discussion of how your infrastructure portfolio characteristics (i.e., level of ownership, infrastructure management role, type of infrastructure, geographical spread, division between brownfield and greenfield, etc.) affect the way you influence the operations of your infrastructure investments and thus responsible investment implementation.

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INF 02	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 1-6

INF 02	INDICATOR	
INF 02.1	Indicate whether your organisation has a responsible investment policy for infrastructure.	
	❍ Yes	❍ No
INF 02.2	Provide a URL if your policy is publicly available. [OPTIONAL]	
INF 02.3	Additional information [OPTIONAL]	

INF 02	EXPLANATORY NOTES		
INF 02.1	Policy documents come in various forms and are sometimes referred to as principles or guidance. The policy may be a standalone document or part of the organisation's overall responsible investment policy.		
INF 02.2	Please list here any infrastructure policy document(s) even if you have already listed it/them in the *Strategy & Governance (SG)* module.		
INF 02.3	You may include a description of your policy's coverage for internally managed infrastructure investments.		
LOGIC			
INF 02	[INF 02.2] will be applicable if "Yes" is reported in [INF 02.1]		
ASSESSMENT			
INF 02	Maximum score: Three ★ The assessment of this indicator is based on your responses to [INF 02.1].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	'No'	⭘	
	'Yes'	★★★	

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SECTION

Fund-raising of infrastructure funds

INF 03	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 1, 4, 6

INF 03	INDICATOR	
INF 03.1	Indicate whether your most recent fund placement documents (private placement memorandums (PPMs) or similar) refer to responsible investment aspects of your organisation. ❍ Yes ❍ No ❍ Not applicable as our organisation does not fund-raise	
INF 03.2	Indicate how your fund placement documents (PPMs or similar) refer to the following responsible investment aspects of your organisation.	
	❑ Policy and commitment to responsible investment	
	❑ Approach to ESG issues in pre-investment processes	
	❑ Approach to ESG issues in post-investment processes	
INF 03.3	Describe how your organisation refers to responsible investment for infrastructure funds in fund placement documents (PPMs or similar). [OPTIONAL]	
INF 03.4	Describe why your organisation does not fund-raise.	

INF 03	EXPLANATORY NOTES
INF 03	This indicator covers the fund-raising process for infrastructure funds in which a relationship between the direct investor and the indirect investor client is established. A PPM or similar document issued by the direct investor about a particular fund can provide the recipient with a general sense of your approach to responsible investment and management of ESG issues. This indicator is applicable only for general partners/direct fund managers. It is not applicable for co-investing asset owners (AOs)/limited partners (LPs). If this indicator is applicable to you but your organisation does not fund-raise, please select “Not applicable as our organisation does not fund-raise”. If your organisation does fund-raise but was not actively fund-raising during the reporting year, please select the option that best represents your typical approach. As a general rule, this is the approach your organisation is likely to take during your next round of fund-raising or what it included in your most recent round of fund-raising.

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INF 03.3	You may include a discussion of your typical PPM's coverage: • Policy (e.g., reference to responsible investment and consideration of ESG issues throughout all investment stages) • Pre-investment (e.g., processes such as due diligence and the consideration of ESG issues in these) • Post-investment (e.g., ESG implementation programmes for portfolio companies/assets, tracking achievements and identifying opportunities through monitoring processes such as audits that consider ESG issues, until exit) Please report on any PPM issued recently, not necessarily during the reporting year.
LOGIC	
INF 03	[INF 03.2] and [INF 03.3] will be applicable if 'Yes' is reported in [INF 03.1]. [INF 03.4] will be applicable if 'Not Applicable' is reported in [INF 03.1]. [INF 04] will not be applicable if you report "Not applicable because our organisation does not fund-raise" in [INF 03.1].
ASSESSMENT	
INF 03	Maximum score: Three ★ The assessment of this indicator is based on your responses to [INF 03.1] and [INF 03.2]. Asset owners/limited partners are not assessed on this indicator. If you report "Not applicable as our organisation does not fund-raise", this indicator will not form part of your score.

Indicator scoring methodology

Selected response	Level score	Further Details
'Not applicable as our organisation does not fund-raise'	N/A	
'No' in INF 03.1	⭘	
'Yes' in INF 03.1 AND one selection from policy, pre-investment or post-investment in INF 03.2	★	
'Yes' in INF 03.1 AND two selections from policy, pre-investment or post-investment in INF 03.2	★★	
'Yes' in INF 03.1 AND all three selections from policy, pre-investment or post-investment in INF 03.2	★★★	

INF 03	DEFINITIONS
Fund placement documents or Private Placement Memorandum (PPM)	A fund placement document or Private Placement Memorandum (PPM) provides a broad range of information to help potential investors learn about the firm and its investment strategy as well as the proposed summary terms and conditions of the investment opportunity. These types of documents are also known as an "Offering Memorandum". A firm will issue a fund placement document or PPM to prospective limited partners/investors when it is attempting to raise capital through a fund offering.

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INF 04	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PRI 4

INF 04	INDICATOR
INF 04.1	Indicate whether your organisation makes formal commitments in fund formation contracts, Limited Partnership Agreements (LPAs) or side letters relating to responsible investment in infrastructure when requested by clients. ❍ We always make formal commitment to responsible investment in fund formation contracts, LPAs or side letters. ❍ In a majority of cases, we make formal commitment to responsible investment in fund formation contracts, LPAs or side letters. ❍ In a minority of cases, we make formal commitment to responsible investment in fund formation contracts, LPAs or side letters. ❍ We do not make formal commitment to responsible investment in fund formation contracts, LPAs or side letters. ❍ We do not make formal commitments to responsible investment in fund formation contracts, LPAs or side letters because our clients do not ask us to do so.
INF 04.2	Additional information

INF 04	**EXPLANATORY NOTES**
INF 04	This indicator is applicable only for general partners/direct fund managers. It is not applicable for co-investing asset owners (AOs)/limited partners (LPs).
INF 04.1	*Fund formation contracts, Limited Partnership Agreements (LPAs)* Formal commitments on responsible investment implementation and consideration of ESG issues can be requested by investors and included in fund formation contracts, LPAs and side letters. They can also be made in your investment strategy, guidelines, and/or mandate, either in a dedicated paragraph or integrated throughout the document. The latter approach can eliminate the need for separate fund formation contracts, LPAs or side letters. Please report on any fund formation contracts, LPAs and side letters signed upon request from investors/LPs recently, not necessarily during the reporting year. Please note that a formal commitment can have different levels of significance when it comes to implementation. Even though a responsible investment policy is mentioned, it does not mean ESG issues will be implemented in operational processes.
INF 04.2	You may include a discussion of: • Description of your organisation's responsible investment commitments • Adoption and alignment of policies between direct and indirect investors in relationship to responsible investment and ESG issues • Exclusion of investments in certain areas either based on a direct infrastructure's own suggestion or in accordance with the indirect investor's preferences • Processes in place to deliver approach towards responsible investment and consideration of ESG issues, both during pre- and post-investment (including exits) • Listing of specific E, S and G issues (e.g., climate change and remuneration, and how they will be dealt with (if required) • Portfolio companies' undertaking in relationship to ESG issues

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	• How reporting on ESG issues will be carried out during the life of the fund(s) • How and when potential incidents among portfolio companies will be communicated to investors If your formal commitments to responsible investment in infrastructure exist through other mechanisms that have been described in the *Strategy & Governance* module, please refer to that reported information in this indicator.
LOGIC	
INF 04	This section (indicators [INF 03] and [INF 04]) is about responsible investment and ESG inclusion in relationship to fund-raising and promotion of funds. This section is therefore applicable only for investment managers. It is not applicable for co-investing asset owners/limited partners. [INF 04] will not be applicable if you report "Not applicable because our organisation does not fund-raise" in [INF 03.1].
ASSESSMENT	
INF 04	Maximum score: Three ★ The assessment of this indicator is based on your responses to [INF 04.1]. If your clients do not ask that you make a formal commitment to RI, then you will not be assessed on this indicator, and it will be removed from your denominator. Asset owners/limited partners are not assessed on this indicator.

Indicator scoring methodology

Selected response	**Level score**
We do not make formal commitments to responsible investment in fund formation contracts, LPAs or side letters because our clients do not ask us to do so	N/A
We do not make formal commitment to responsible investment in fund formation contracts, LPAs or side letters	⭘
In a minority of cases we make formal commitment to responsible investment in fund formation contracts, LPAs or side letters	★
In a majority of cases we make formal commitment to responsible investment in fund formation contracts, LPAs or side letters	★★
We always make formal commitment to responsible investment in fund formation contracts, LPAs or side letters	★★★

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SECTION

Pre-Investment (selection)

INF 05	Indicator status MANDATORY	Purpose GATEWAY	Principle PRI 1

INF 05	INDICATOR	
INF 05.1	Indicate whether your organisation typically incorporates ESG issues when selecting infrastructure investments.	
	❍ Yes	❍ No
INF 05.2	Describe your organisation's approach to incorporating ESG issues in infrastructure investment selection.	

INF 05	EXPLANATORY NOTES
INF 05	This gateway indicator allows you to report whether your organisation incorporates ESG issues when selecting investments. The details of your processes will be captured in subsequent indicators.
INF 05.2	Describe your approach in terms of the different stages leading up to the investment decision. This may include a discussion of: • Whether the incorporation of ESG issues in pre-investment is determined by client mandates and, in that case, how it has been structured • How ESG issues, short- and long-term, are incorporated into the pre-investment process • How you use ESG issues to assess downside risk and value creation opportunities • Any differences in how ESG issues are taken into account in different infrastructure types and geographic regions • How your approach to ESG issues differs between or within investment strategies *Scope* This indicator covers all stages of your pre-investment decision-making process (initial screening, due diligence, investment decision).
LOGIC	
INF 05	[INF 05.2] will be applicable if 'Yes' is reported in [INF 05.1] [INF 06 - INF 09] will be applicable if you report 'Yes' in [INF 05.1]
ASSESSMENT	
INF 05	This indicator is not assessed, but a 'No' response will result in a zero score for the whole of the pre-investment section.

INF 05	DEFINITIONS
ESG Incorporation	Please see the document with Main Definitions.

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INF 06	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle PRI 1, 4

INF 06	INDICATOR	
INF 06.1	Indicate whether your organisation typically uses ESG advice and research sourced internally and/or externally when incorporating ESG issues into the infrastructure investment selection process.	
	❑ Internal staff	❑ Specify role _____ ❑ Specify role _____ ❑ Specify role _____
	❑ External resources	❑ Environmental advisors ❑ Social advisors ❑ Corporate governance advisors ❑ Regulatory and/or legal advisors ❑ Other; specify type of advisors/roles_____
	❑ No use of internal or external advice on ESG issues	
INF 06.2	Additional information	

INF 06	EXPLANATORY NOTES
INF 06.1	*Internal staff* Internal roles could include those with responsibility for overseeing and/or implementing responsible investment activities. *External resources* External resources that provide advice, due diligence and analysis on E, S and G issues to identify potential risks and/or value creation opportunities. Please provide examples in the 'specify' fields. *Incorporating ESG issues* Refers to strategies, processes and activities that take ESG issues and information about them into account in the pre-investment process (initial screening, due diligence, investment decision).
INF 06.2	You may report on the division of responsibilities between internal and external specialists (if applicable) and the type of advisors/specialists involved in the research process, for example: • Legal counsel • Engineers • Acquisition advice You may also report on whether they provide advice based on geographic location, infrastructure type, new versus existing infrastructure assets and local regulations. You are not required to disclose the names of individuals or organisations that provide advice and/or research, but it would be helpful if you could indicate the type of organisation (e.g., university, infrastructure consultants).
LOGIC	
INF 06	[INF 06] will be applicable if you report 'Yes' in [INF 05.1]

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INF 07	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 1, 3

INF 07	INDICATOR	
INF 07.1	Indicate which E, S and/or G issues are typically considered by your organisation in the investment selection process, and list up to three typical examples per issue.	
	ESG issues	**List up to three typical examples per E, S and G issue**
	❑ Environmental	
	❑ Social	
	❑ Governance	
INF 07.2	Additional information [OPTIONAL]	

INF 07	EXPLANATORY NOTES
INF 07.1	ESG issues vary between sectors, portfolio companies, markets, etc. There are also differences in legal requirements with regards to ESG issues in different jurisdictions. The indicator seeks information about whether you typically consider relevant E, S and G issues in the investment selection process. List here only the most typical ESG issues you consider, given your organisation's approach and the jurisdictions in which you operate. Please note that it is only mandatory to report and disclose one example per E, S and G issue (right hand column). The remaining rows per E, S and G issue are voluntary to report and disclose.
INF 07.1	The following are examples only. These issues will not be relevant in every case, and this is not intended to be an exhaustive list of potentially relevant issues. *Environmental* Landscape, noise, energy generation/consumption/efficiency (conventional + renewables), greenhouse gas emissions, water consumption, waste generation, indoor air quality, flooding and contamination, land use, biodiversity/ecology, building materials, alternative means of transport *Social* Health and safety, accident rates, disability access, security, fair wages for workers maintaining the assets, labour standards in procurement policy (or similar), affordable workforce housing, social enterprise partnering, community development.

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	Governance Executive benefits and compensation, bribery and corruption, shareholder structure and rights, business ethics, board structure and composition, independent directors, processes (e.g., environmental management systems), risk management (e.g., regulatory and reputational risk), whistle-blowing schemes, stakeholder dialogue, lobbying (e.g., standards and certifications) and disclosure (e.g., performance or benchmarks). This category may also include business strategy issues, both the implications of business strategy for environmental and social issues and how the strategy is implemented.
INF 07.2	Provide additional details relevant to information on the ESG issues considered by your organisation in the investment selection process, e.g., linked to geographic location, type of sector and/or legislation.
LOGIC	
INF 07	[INF 07] will be applicable if you report 'Yes' in [INF 05.1]
ASSESSMENT	
INF 07	Maximum score: Three ★ The assessment of this indicator is based on your response to [INF 07.1].

Indicator scoring methodology		
Selected response	**Level score**	**Further Details**
No ESG issues	⭘	
One E, S or G issue considered	★	
Two E, S or G issues considered	★★	**The two issues must be from different ESG categories.**
All three ESG issues considered	★★★	

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INF 08	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PRI 1-3

INF 08	INDICATOR
INF 08.1	Indicate what type of ESG information your organisation typically considers during your infrastructure investment selection process. ❑ Raw data from the target infrastructure asset/company ❑ Benchmarks/ratings against similar infrastructure asset ❑ Sector level data/benchmarks ❑ Country level data/benchmarks ❑ Reporting standards, infrastructure sector codes and certifications ❑ International initiatives, declarations or standards ❑ Engagements with stakeholders (e.g., contractors and suppliers) ❑ Advice from external sources ❑ Other; specify _____ ❑ We do not track this information.
INF 08.2	Additional information

INF 08	EXPLANATORY NOTES
INF 08.2	This may include a discussion of: • Sources of information on ESG issues that you frequently use • Whether there is a difference between the sources used by internal and external advisors • Whether your organisation keeps records of ESG information considered in the investment selection process
LOGIC	
INF 08	[INF 08] will be applicable if you report 'Yes' in [INF 05.1]
ASSESSMENT	
INF 08	Maximum score: Three ★ The assessment of this indicator is based on your response to [08.1].

Indicator scoring methodology

Selected response	Level score	Further Details
'We do not track this information'	⭘	
1–2 selections	★	Including if 'other' is selected
3–4 selections	★★	Including if 'other' is selected
More than 4 selections options	★★★	Including if 'other' is selected

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PRI Principles for Responsible Investment

INF 09	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PRI 1

INF 09	INDICATOR
INF 09.1	Indicate whether ESG issues impacted your infrastructure investment selection processes during the reporting year. ❑ ESG issues helped identify risks and/or opportunities for value creation. ❑ ESG issues led to the abandonment of potential investments. ❑ ESG issues impacted the investment in terms of price offered and/or paid. ❑ ESG issues impacted the terms in the shareholder/purchase agreements and/or lending covenants. ❑ ESG issues were considered but did not have an impact on the investment selection process. ❑ Other; specify _____ ❑ Not applicable, our organisation did not select any investments in the reporting year ❑ We do not track this potential impact.
INF 09.2	Indicate how ESG issues impacted your infrastructure investment deal structuring processes during the reporting year. ❑ ESG issues impacted the investment in terms of price offered and/or paid. ❑ ESG issues impacted the terms in the shareholder/purchase agreements and/or lending covenants. ❑ ESG issues were considered but did not have an impact on the deal structuring process. ❑ Other; specify _____ ❑ Not applicable, our organisation did not select any investments in the reporting year ❑ We do not track this potential impact.
INF 09.3	Additional information

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INF 09	EXPLANATORY NOTES		
INF 09.3	You are encouraged to generalise your impact measures, analysis and conclusions across different pre-investment processes and not to report on every single deal and its individual characteristics. Indicator [INF 18] will allow you to provide specific examples. "ESG issues were considered but did not have an impact on the investment selection process" refers to situations in which no ESG issues were identified or ESG issues were considered during the investment selection but were considered to be below the materiality threshold and therefore did not impact the investment.		
LOGIC			
INF 09	[INF 09] will be applicable if you report 'Yes' in [INF 05.1]		
ASSESSMENT			
INF 09	Maximum score: Three ★ The assessment of this indicator is based on your response to [INF 09.1].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	'We do not track this potential impact' in INF 09.1 and INF 09.2.	○	
	One selection in either INF 09.1 OR INF 09.2.	★	Including if 'other' is selected
	At least one selection in INF 09.1 AND INF 09.2.	★★	
	At least three selections from INF 09.2 AND INF 09.2.	★★★	

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SECTION

Selection, appointment and monitoring of third-party infrastructure operators

INF 10	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 4

INF 10	INDICATOR	
INF 10.1	Indicate whether your organisation includes ESG issues in your selection, appointment and/or monitoring of third-party operators.	
	❍ Yes	❍ No
INF 10.2	Indicate whether your organisation includes ESG issues in your selection, appointment and/or monitoring of third-party operators.	
	❑ Selection process of third-party operators incorporates ESG issues.	❍ For all third-party operators ❍ For a majority of third-party operators ❍ For a minority of third-party operators
	❑ Contractual requirements when appointing third-party operators includes ESG issues.	❍ For all third-party operators ❍ For a majority of third-party operators ❍ For a minority of third-party operators
	❑ Monitoring of third-party operators covers ESG responsibilities and implementation.	❍ For all third-party operators ❍ For a majority of third-party operators ❍ For a minority of third-party operators
INF 10.3	Provide a brief description of your organisation's selection, appointment and monitoring of third-party operators. [OPTIONAL]	
INF 10.4	Describe how your third-party operators contribute to the management of ESG issues for your infrastructure investments. [OPTIONAL]	

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INF 10	EXPLANATORY NOTES
INF 10	This section is applicable only if your organisation has equity stakes in infrastructure investments and outsources infrastructure operation to third-party operators, i.e., organisations with their own management and operating staff in place for infrastructure assets in which your organisation has ownership, as reported in OO. If your internal teams and/or your portfolio companies control the operations of infrastructure assets, this indicator will not be applicable. If you manage some infrastructure assets in-house and outsource some, you should report only about those assets for which the management is outsourced.
INF 10.2	A majority refers to >50%; a minority refers to <50% of infrastructure third-party operators. Determine the proportion for each row based on the number of third-party operators.
INF 10.3	*Selecting third-party operators* This may include a discussion of: • How your selection processes for managers is structured, *Appointing third-party operators* This may include a discussion of: • Type of ESG responsibilities, implementation requirements and measures in contractual agreements • How the implementation of ESG issues was formally agreed upon (if applicable) *Monitoring third-party operators* This may include a discussion of: • Your typical interaction with the organisation that controls the operations of the infrastructure asset • Whether you make regular site visits • To what extent your interactions include discussions of ESG initiatives • Whether there are variations across different managers/operators in the monitoring that you carry out • Whether you have a performance evaluation and incentive system based on ESG issues for your infrastructure managers/operators
INF 10.4	This may include a discussion of: • The type of services with, for example, environmental and social coverage.
LOGIC	
INF 10	[INF 10] will be applicable if you reported that your organisation has some proportion of your infrastructure assets managed by third-party operators, appointed by your organisation and/or companies you owned [OO INF 02.1]. [INF 10.2], [INF 10.3] and [INF 10.4] will be applicable if "Yes" is reported in [INF 10.1]
ASSESSMENT	
INF 10	Maximum score: Nine ★ The assessment of this indicator is based on your responses to [INF 10.1] and [INF 10.2]. Organisations that do not use third-party operators will not be assessed on this indicator.

Indicator scoring methodology		
Selected response	**Level score**	**Further Details**
INF 10.1 – Selection (a)		

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	ESG issues not considered in selection process	○	
	'For a minority of third-party operators'	★	
	'For a majority of third-party operators'	★★	
	'For all third-party operators'	★★★	
	INF 10.1 – Contractual requirements when Appointing (b)		
	ESG issues not considered in contractual requirements	○	
	'For a minority of third-party operators'	★	
	'For a majority of third-party operators'	★★	
	'For all of third-party operators'	★★★	
	INF 10.1 – Monitoring (c)		
	ESG issues not considered in monitoring processes	○	
	'For a minority of third-party operators'	★	
	'For a majority of third-party operators'	★★	
	'For all of third-party operators'	★★★	

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PRI Principles for Responsible Investment

SECTION

Post-investment (monitoring and active ownership)

OVERVIEW

INF 11	Indicator status MANDATORY	Purpose GATEWAY	Principle PRI 2

INF 11	INDICATOR	
INF 11.1	Indicate whether your organisation and/or operators consider ESG issues in post-investment activities relating to your infrastructure assets.	
	❍ Yes	❍ No
INF 11.2	Indicate how your organisation and/or operators considers ESG issues in the following post-investment activities relating to your infrastructure assets.	
	❑ We consider ESG issues in the monitoring and operation of infrastructure. ❑ We consider ESG issues in infrastructure maintenance. ❑ We consider ESG issues in stakeholder engagements related to our infrastructure. ❑ We consider ESG issues in other post-investment activities; specify _____	
INF 11.3	Describe how your organisation and/or operators considers ESG issues in post-investment activities related to your infrastructure investments. [OPTIONAL]	

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INF 11	EXPLANATORY NOTES
INF 11	This indicator refers to the consideration of ESG issues in ongoing infrastructure monitoring and management processes and activities.
INF 11.2	*Infrastructure maintenance* The term 'infrastructure maintenance' refers to repair, rehabilitation, renewal and upgrade activities. If you have a policy and procedures to address ESG issues in the maintenance of your assets but did not apply it in the reporting year because no maintenance of infrastructure assets were ongoing, you should still select 'We consider ESG issues in infrastructure maintenance'.
INF 11.3	You may outline how you consider ESG issues in the different areas and associated activities. For example, you can describe whether your organisation, your infrastructure operators and/or co-investors have the main responsibility for the different areas of infrastructure investment monitoring and implementation. If you are a minority investor, your description can cover how you influence other investors in an asset and/or their infrastructure operators to consider ESG issues in their monitoring and management processes and activities. Depending on the deal structure and governance of the fund, it may not be possible for you to engage with the community (e.g., if you are an asset owner). You may also outline whether you have specific guidelines by which operating programs, plans and short- or long-term goals for these activities are captured and described.
LOGIC	
INF 11	[INF 12 - INF 14] are applicable if you select "We consider ESG issues in the monitoring and operation of infrastructure" in [INF 11.2] If you report in [INF 11.1] "No" (that you do not consider ESG issues in post-investment activities) [INF 12 - INF 16] will not be applicable.
Assessment	
INF 11	This indicator is not assessed, but a 'No' response in [INF 11.1] will result in a zero score for the whole of the post-investment section. In [INF 11.2], if you report that you do not consider ESG in the 'monitoring and operation of infrastructure', 'infrastructure maintenance' and/or 'stakeholder engagements', you will receive a zero score for that sub-section.

INF 11	DEFINITIONS
Stakeholder engagements	Refers to direct interactions between your organisation, your infrastructure operators and/or your co-investors and various stakeholders with the objective of informing, discussing or influencing them on ESG issues concerning your infrastructure assets.

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INFRASTRUCTURE MONITORING AND OPERATIONS

INF 12	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 2

INF 12	INDICATOR
INF 12.1	Indicate the proportion of infrastructure assets for which your organisation and/or operators included ESG performance in investment monitoring during the reporting year. ❍ >90% of infrastructure assets ❍ 51-90% of infrastructure assets ❍ 10-50% of infrastructure assets ❍ <10% of infrastructure assets (in terms of number of infrastructure assets)
INF 12.2	Indicate ESG issues for which your organisation and/or operators typically sets and monitors targets (KPIs or similar) and provide examples per issue.

ESG issues	List up to three example targets per issue
❑ Environmental	
❑ Social	
❑ Governance	
❑ We do not set and/or monitor against targets.	

INF 12.3	Additional information [OPTIONAL]

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INF 12	EXPLANATORY NOTES
INF 12	This indicator aims to capture your approach to ESG performance in the active monitoring of your infrastructure assets. The type of monitoring activities undertaken can range from e.g., individual engagements with boards and/or with senior management, to reviews of ESG information in portfolio company reports.
INF 12.1	*Monitoring ESG performance when holding board seats* Being on the board of a company and consider ESG issues, e.g., by discussing with management or requesting reports, is considered monitoring. Being on the board and not encouraging, reviewing reports or participating in discussions around ESG issues should not be reported as monitoring. Determine the proportion based on the total number of infrastructure assets.
INF 12.2	ESG issues vary between sectors, portfolio companies, markets, etc. This indicator seeks information about which relevant E, S and G issues you set and monitor targets for among portfolio companies/investees. For example, an environmental target might be water quality or CO2 emissions. Please note that it is only mandatory to report and disclose one example per E, S and G issue (right hand column). The remaining rows per E, S and G issue are voluntary to report and disclose.
INF 12.3	You may include a discussion of: • How you monitored ESG issues on an ongoing basis and whether your approaches to ESG issues differed if the associated risks and/or opportunities are expected to occur after you invest and prior to exit • How the approach differs between infrastructure sectors, geographies and strategies • Frequency and type of communication with senior management and the board • Whether exit is seen as an option if companies do not live up to desired ESG performance
LOGIC	
INF 12	[INF 12] is applicable if you select "We consider ESG issues in the monitoring and operation of infrastructure" in [INF 11.2]
ASSESSMENT	
INF 12	Maximum score: Three ★ This assessment of this indicator is based on your response to [INF 12.1].

Indicator scoring methodology

Selected response	Level score	Further Details
INF 12.1		
0% OR <10% of infrastructure investments	⭘	
10 – 50% of infrastructure investments	★	
51 – 90% of infrastructure investments	★★	
>90% of infrastructure investments	★★★	

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INF 13	Indicator status MANDATORY	Purpose ADDITIONAL ASSESSED	Principle PRI 2

INF 13	INDICATOR	
INF 13.1	Indicate whether you track the proportion of your infrastructure investees that have an ESG/sustainability-related policy (or similar guidelines).	
	❍ Yes	❍ No
INF 13.2	Indicate the proportion of your infrastructure investees that has an ESG/sustainability-related policy (or similar guidelines).	
	❍ >90% of infrastructure investees ❍ 51-90% of infrastructure investees ❍ 10-50% of infrastructure investees ❍ <10% of infrastructure investees ❍ 0% of infrastructure investees (in terms of number of infrastructure investees)	
INF 13.3	Describe how your organisation and/or your operators contribute to the infrastructure investees' management of ESG issues. [OPTIONAL]	

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INF 13	EXPLANATORY NOTES
INF 13.2	Determine the proportion based on the number of infrastructure investees. ESG/sustainability policy refers to an overall statement, standalone or integrated, about how infrastructure investees approach relevant ESG issues in, e.g., their strategy, objectives, operations and/or reporting practise. Such a policy will normally address a range of relevant E, S and/or G issues and outline the activities an organisation undertakes to address them. Infrastructure investees may have guidelines on relevant ESG issues within other policies (or guidelines). Include infrastructure investees that already have appropriate ESG/sustainability policies, operations and/or targets and for which your organisation considers that necessary actions have been taken to integrate ESG issues. These types of actions can have different levels of significance when it comes to implementation, depending on individual infrastructure investees' need to manage and improve ESG performance.
INF 13.3	The type of activities undertaken can range from individual engagements with boards or with senior management to the sharing of best management practice in a workshop attended by a number of portfolio/holding companies. This description could cover how ESG risks and/or opportunities in general have been integrated by your portfolio assets/companies as a result of your ownership activities and influence (if tracked).
INF 13.4	Portfolio assets/companies are often at different levels of development, and their progress toward incorporating ESG issues within their policies and operations may differ. For example, some companies may even have been acquired due to their poor ESG performance (on the basis that any improvement in this area may create growth opportunities and potentially increase value). You may highlight how these kinds of variations affect your reported information.
LOGIC	
INF 13	[INF 13] is applicable if you select "We consider ESG issues in the monitoring and operation of infrastructure" in [INF 11.2] [INF 13.2] and [INF 13.3] will be applicable if "Yes" is reported in [INF 13.1].
ASSESSMENT	
INF 13	Maximum score: Three ★ The assessment of this indicator is based on your responses to [INF 13.2].

Indicator scoring methodology

Selected response	Level score	Further Details
0% OR <10% of infrastructure investments	⭘	
10 – 50% of infrastructure investments	★	
51 – 90% of infrastructure investments	★★	
>90% of infrastructure investments	★★★	

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INF 14	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle PRI 2, 3

INF 14	INDICATOR	
INF 14.1	Indicate the type and frequency of reports you request and/or receive from infrastructure investees covering ESG issues.	
	Type of reporting	**Type of reporting frequency**
	❑ Overarching portfolio asset/company reports or similar in which management disclosure, financial and ESG data are integrated	❍ Quarterly or more frequently ❍ Biannually ❍ Annually ❍ Less frequently than annually ❍ Ad hoc/when requested; specify_____
	❑ Standalone reports highlighting targets and/or KPIs covering ESG issues	[same as above]
	❑ Other; specify _____	[same as above]
	❑ No reporting on ESG issues requested and/or provided by infrastructure investees	
INF 14.2	Additional information	

INF 14	EXPLANATORY NOTES
INF 14	This indicator seeks information about how you ask existing infrastructure investees to measure their ESG efforts and report this information. The ESG-related actions and outcomes can be covered in different metrics, depending on the investee's normal reporting cycle and preferences among investors.
INF 14.2	You may include a description and discussion of: • Whether some types of ESG information are requested more frequently than others • The ESG information that your organisation requests from existing infrastructure investees • Whether the format of information is based on internal or external standards, metrics or templates. External templates and guidance could include those of International Finance Corporation (IFC), Global Reporting Initiative (GRI) and the United Nations Global Compact (UNGC) • Whether you believe your interests are best served by asking investees to integrate material information into one report or if you prefer receiving separate reports
LOGIC	
INF 14	[INF 14] is applicable if you select "We consider ESG issues in the monitoring and operation of infrastructure" in [INF 11.2]

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INFRASTRUCTURE MAINTENANCE

INF 15	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 2

INF 15	INDICATOR
INF 15.1	Indicate the proportion of active infrastructure maintenance projects in which ESG issues have been considered. ❍ >90% of active maintenance projects ❍ 51-90% of active maintenance projects ❍ 10-50% of active maintenance projects ❍ <10% of active maintenance projects ❍ N/A, no maintenance projects of infrastructure assets are active (in terms of number of active maintenance projects)
INF 15.2	Describe your approach to ESG considerations for infrastructure maintenance projects. [OPTIONAL]

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INF 15	EXPLANATORY NOTES
INF 15	'Active' infrastructure maintenance projects refer to those that are taking place during the reporting year. The term 'infrastructure maintenance' refers to repair, rehabilitation, renewal and upgrade activities.
INF 15.1	Determine the proportion in terms of the number of active maintenance projects.
INF 15.2	Your description may cover how your organisation approaches the incorporation of ESG issues into infrastructure maintenance projects. For example, you may comment on: • Whether specific ESG consideration such as environmental site selection requirements, sustainable construction materials, energy efficiency requirements, waste management plans at development sites, etc., are implemented and monitored in your ongoing developments • Whether your maintenance activities aim to improve ESG performance • Whether your operators (if applicable) have a duty to achieve improvements in ESG performance • Drivers behind active maintenance projects (e.g., investor client demand, economic benefit, future proofing against regulation, compliance with existing regulation, or other) • Whether your organisation has ESG standards in place for contractors and how you ensure that contractors comply with these standards
LOGIC	
INF 15	[INF 15] is applicable if you select "We consider ESG issues in infrastructure maintenance" in [INF 11.2]
ASSESSMENT	
INF 15	Maximum score: Three ★ The assessment of this indicator is based on your responses to [INF 15.1]. If no maintenance projects are currently active, then you will not be assessed on this indicator.

Indicator scoring methodology

Selected response	Level score	Further Details
N/A, no maintenance projects of infrastructure assets are active	N/A	
0% OR <10% of active maintenance projects	⭘	
10 – 50% of active maintenance projects	★	
50 – 90% of active maintenance projects	★★	
>90% of active maintenance projects	★★★	

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STAKEHOLDER ENGAGEMENT

INF 16	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PRI 2

INF 16	INDICATOR	
INF 16.1	Indicate which stakeholders your organisation and/or operators engaged with on ESG issues in relationship to your infrastructure assets during the reporting year and what proportion of your investments they apply to.	
	Stakeholders engaged	**Percentage of infrastructure assets these apply to**
	❑ Regulators	❍ >90% of infrastructure assets ❍ 51-90% of infrastructure assets ❍ 10-50% of infrastructure assets ❍ <10% of infrastructure assets (in terms of number of infrastructure assets)
	❑ Communities	[same as above]
	❑ Other stakeholder; specify_____	[same as above]
INF 16.2	Describe your approach to stakeholder engagements in relationship to your infrastructure assets.	

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INF 16	EXPLANATORY NOTES
INF 16.1	'Communities' refer to stakeholders based around infrastructure assets and generally include members of the public. Media are not included in this category. You will be able to add up to two 'other stakeholder' rows in the online reporting tool. Determine the proportion based on the number of infrastructure investments.
INF 16.2	You may describe how your organisation and/or operators engages with stakeholders on ESG issues. Your description may include discussion of: • How your organisation selects stakeholders for engagements • How your organisation communicates with stakeholders • How your organisation ensures that stakeholders understand the sustainability attributes of your infrastructure investments • Whether partnership agreements between your organisation and stakeholders to work on certain ESG issues are in place • How you measure and monitor the impact of your stakeholder engagement program Depending on the infrastructure sector, your and/or your third part operators' ability to influence and engage the community might be challenging. If applicable, please discuss this in your response to this indicator. For transparency purposes, INF 03 also gives you an opportunity to provide some context around which infrastructure sectors you have invested in.
LOGIC	
INF 16	[INF 16] is applicable if you select "We consider ESG issues in stakeholder engagements related to our infrastructure" in [INF 11.2]
ASSESSMENT	
INF 16	Maximum score: Three ★ The assessment of this indicator is based on your responses to [INF 16.1].

Indicator scoring methodology

Selected response	Level score	Further Details
No stakeholder engagement	⭘	
Engage with at least one stakeholder and <10% of existing infrastructure assets	★	
Engage with at least one stakeholder and 10-50% of existing infrastructure assets	★★	
Engage with at least one stakeholder and >50% of existing infrastructure assets	★★★	

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SECTION

Outputs and outcomes

INF 17	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PRI 1, 2

INF 17	INDICATOR	
INF 17.1	Indicate whether your organisation measures how your approach to responsible investment in infrastructure investments has affected financial and/or ESG performance.	
	❑ We measure whether our approach to ESG issues impacts funds' financial performance. ❑ We measure whether our approach to ESG issues impacts funds' ESG performance. ❑ None of the above	
	Describe the impact on the following.	
	a) Funds' financial performance	❍ Positive ❍ Negative ❍ No impact
	b) Funds' ESG performance	❍ Positive ❍ Negative ❍ No impact
INF 17.2	Describe how you are able to determine these outcomes.	

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INF 17	EXPLANATORY NOTES
INF 17	This indicator aims to capture the impact, whether positive or negative, of taking account and managing ESG issues on both financial and ESG performance. The impact could come from either pre-investment activities (e.g., picking the best investments) or post-investment influencing. *Financial performance* Examples may include reduced operating expenses, improved net operating income (NOI), capitalized value, etc. Note that financial risk mitigation should also be included in this category. *ESG performance* This relates to tracking the performance of ESG risks and/or opportunities throughout the lifetime of a fund. Examples may include water and energy efficiency improvements, reduction of waste, reduction of health and safety incidents, etc. Note that ESG risk mitigation should also be included in this category.
INF 17.2	Describe how you measure the impact of ESG issues on financial returns, risks and/or ESG performance. You are strongly encouraged to report on carbon benchmarking, if this is undertaken. You are encouraged to specify the ESG issues (e.g., greenhouse gas emissions, water consumption) and financial measures you use to assess performance and to comment on any practical issues in using these measures in your processes.
LOGIC	
INF 17	[INF 17.2] is applicable if you report that your organisation measures how ESG issues affect financial performance or ESG performance in [INF 17.1].
ASSESSMENT	
INF 17	Maximum score: Three ★ The assessment of this indicator is based on your responses to [INF 17.1].

Indicator scoring methodology

Selected response	Level score	Further Details
'No'	⭘	
Measure EITHER financial or ESG performance	★★	
Measure financial AND ESG performance	★★★	

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INF 18	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle PRI 1-3

INF 18	INDICATOR			
INF 18.1	Provide examples of ESG issues that affected your infrastructure investments during the reporting year.			
	ESG issues	**Types of infrastructure affected**	**Impact (or potential impact) on the investment**	**Activities undertaken to influence the investment and its outcomes**
INF 18.2	Additional information.			

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INF 18	EXPLANATORY NOTES
INF 18.1	*ESG issues* Refer to the infrastructure definitions for ESG issues in the Main Definitions document. Examples of ESG issues in infrastructure include: • Changes in subsidies for renewable energy • Introduction of carbon tax/carbon trading, leading to increased costs or incentives for energy efficiency/investment in renewables • Worker safety • Working conditions (manifested in strikes and other industrial action) • Super-normal returns from low carbon intensity electricity generation (e.g., an existing hydro generator in an Emissions Trading Scheme) • Strong relationships/alignment with policy-makers (to influence environment/social regulation in the company's favour) *Types of infrastructure affected* For example: transportation, energy infrastructure, water management *Impact (or potential impact) on the investment* • The financial, reputational and/or ESG/sustainability-related impact (or potential impact) • What stage in the investment process the ESG issues were identified (e.g. initial screening, due diligence, decision or investment monitoring) *Activities undertaken to influence the investment and the outcomes* Here you can describe your and/or your infrastructure operators' monitoring activities and the impact of your stakeholder engagements. The number of examples you provide will inevitably depend on exactly how you incorporate ESG issues into your investment processes. Organisations are encouraged to provide at least three and up to five examples. As far as practicable, these examples should be your most material examples of how ESG issues are incorporated.

EXAMPLE			
ESG issues	**Types of infrastructure affected**	**Impact (or potential impact) on the investment**	**Activities undertaken to influence the investment and its response**
Health and Safety	Transportation	Critical H&S breaches may have long-term reputational and financial consequences as well as injuries to workers and potentially fatal consequences.	Improvements were implemented to current H&S management system, and a safety advisor was employed to engage further with the company.

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INF 19	Indicator status MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	Purpose DESCRIPTIVE	Principle PRI 6

INF 19	INDICATOR
INF 19.1	Describe your organisation's approach to disclosing ESG incidents in infrastructure investments to your investor clients.

INF 19	EXPLANATORY NOTES
INF 19.1	You may include a discussion of: • Procedures followed if an incident occurs and how you inform the investor • Types of incidents or events that determine whether you consider it appropriate to disclose it to the investor immediately, or as soon as reasonably practical • Types of disclosure an investor could expect to get in the event of a significant incident or event • Whether certain circumstances will trigger the investors to discuss ESG issues with investment professionals and/or portfolio company management
LOGIC	
INF 19	Indicator [INF 19] relates to communication and incident reporting to investor clients. It is therefore applicable only for general partners/direct fund managers. It is not applicable for co-investing asset owners (AOs)/limited partners (LPs).

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PRI REPORTING FRAMEWORK 2019
Direct — Inclusive Finance

November 2018

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UNEP Finance Initiative
Changing finance, financing change
United Nations Global Compact
An investor initiative in partnership with UNEP Finance Initiative and UN Global Compact

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 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), the purpose of the indicator and which PRI Principle it relates to.

	Indicator status	Purpose	Principle
xxx 01	*MANDATORY*	*CORE ASSESSED*	*PRI 2*

Indicator status

MANDATORY	Mandatory indicators reflect core practices. These responses will be made public and must be completed to submit the framework.
MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	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.
VOLUNTARY	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.
Peering	These indicators are used to determine your peer groups for assessment purposes.
Core assessed	These indicators form the core of the assessment and represent the majority of your final assessment score.
Additional assessed	These indicators represent more advanced or alternative practices and contribute to a smaller part of your score.
Descriptive	These are open-ended narrative indicators, allowing you to describe your activities.

Underneath the indicator

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

xxx 01	*EXPLANATORY NOTES*
xxx 01.1	This provides guidance on how to interpret the sub-indicators, including examples of what could be reported.
xxx 01.2	
LOGIC	
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.
ASSESSMENT	
xxx 01	This provides a brief overview of the pilot assessment approach for this indicator.

xxx 01	*DEFINITIONS*
xxx 01	Specific terms that are used in the indicator are defined here.

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PRI Principles for Responsible Investment

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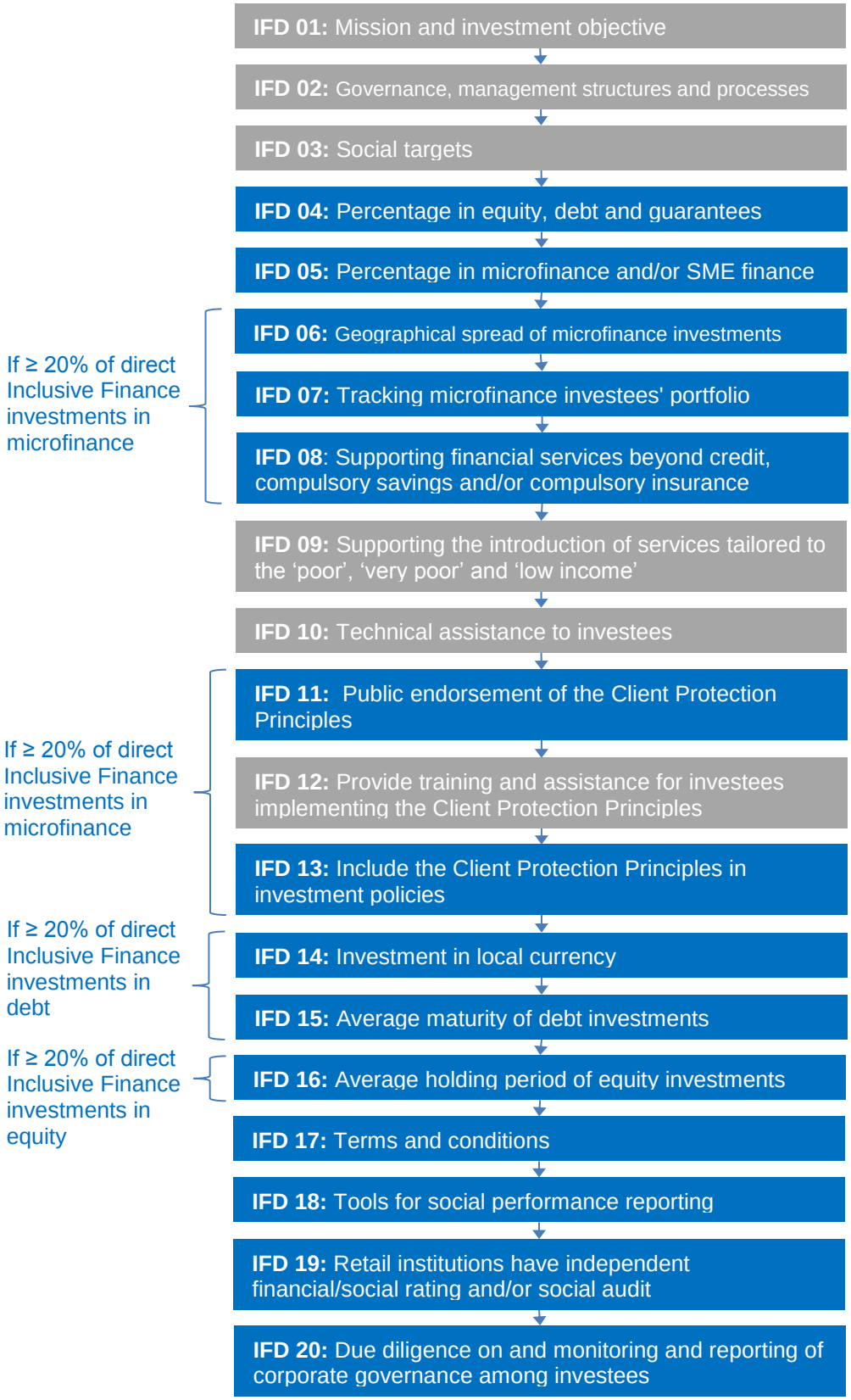
Pathways through the module



Indicators 21–34 continue on the next page

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Continued from the previous page

IFD 21: Training or assistance for investees on corporate governance

If ≥ 20% of direct Inclusive Finance investments in equity

IFD 22: Percentage of investees in which board seats are held

IFD 23: Procedure to integrate environmental issues in investment decision processes

IFD 24: Anti-corruption and whistle-blowing policies

IFD 25: How mission and investment objectives are communicated to stakeholders

IFD 26: Investors and/or the public provided with information aligned with industry standards

IFD 27: Transparency of pricing, terms and conditions among investees

If any tools used for social performance reporting

IFD 28: How social performance of investees affects decision-making and portfolio management

IFD 29: Staff incentives linked to social performance measures

IFD 30: Collecting data regarding social outcomes of investees work

IFD 31: Incentivise investees to track social performance

IFD 32: Collaborative initiatives your organisation has supported or participated in

IFD 33: Encouraging investees to participate in collaborative initiatives

IFD 34: Encouraging your investees to participate in initiatives that contribute to the development of industry benchmarks

IFD End: Module confirmation page

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Preface

Unless otherwise stated, 'assets' refers exclusively to the percentage of your assets directly invested in inclusive finance. If you invest both directly and indirectly in inclusive finance, please report against the following indicators on the basis of your direct investments only.

Direct investors should report against all indicators at the level of their organisation. This requires aggregating data from individual investments, whether across individual Microfinance Institutions (MFIs), Microfinance Investment Vehicles (MIVs) managed and/or including micro-, small- and medium-sized enterprise investments, if feasible.

IFD	DEFINITIONS

Retail providers/Investees

Throughout the module, when we refer to retail providers or investees, these are the retail institutions that investors are investing in. These can be[1] any of the following.

- **Microfinance Institutions (MFIs)** aim to reach low-income households with an increasing variety of financial services, including, but not limited to, financing for their microenterprises. MFIs include banks, regulated non-bank financial institutions (NBFI), savings and loan cooperatives and not-for-profit organisations.
- **Non-specialised Microfinance Service Providers** such as commercial, savings and postal banks and other institutions provide financial services to poor and low-income clients, but their principal business is not microfinance.
- **Holding Companies** provide financing and technical assistance to microfinance institutions. They usually hold a majority stake in their investees and are generally investible only by private invitation.

Summary of updates

The Reporting Framework has not changed since 2017.

To view a detailed summary of the changes to the module, please click here.

For any word limit in the module, please click here.

[1]These definitions are taken from the MIV Disclosure Guidelines.

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PRI Principles for Responsible Investment

SECTION

Context

IFD 01	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle GENERAL

IFD 01	INDICATOR	
IFD 01.1	Indicate whether you have a distinct mission and investment objective for your investment in inclusive finance.	
	❍ Yes	❍ No
IFD 01.2	Describe your inclusive finance mission and investment objective.	
IFD 01.3	Additional information [OPTIONAL]	

IFD 01	EXPLANATORY NOTES
LOGIC	
IFD 01.2	[IFD 01.2] will be applicable if you report 'Yes' in [IFD 01.1]

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IFD 02	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle GENERAL

IFD 02	INDICATOR
IFD 02.1	Provide a brief description of the governance and management structures and processes you have in place for your responsible investment activities and implementation of the PIIF.
	❑ I would like to attach an organisation chart (the following image formats can be uploaded: .jpg, .png, .bmp and .gif).

IFD 02	**EXPLANATORY NOTES**
IFD 02	You may wish to include a discussion of: • the role and responsibility of your board; • details of any formal oversight bodies for responsible investment; • who within the organisation has day-to-day oversight of your responsible investment activities; and/or • details of how and how frequently responsible investment performance is reviewed. This information could include an organisational chart. If you report against the *Strategy & Governance (SG)* module, this indicator will partly overlap with the information reported in SG. Refer here, when necessary, to indicators and your reported information in the SG module.

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IFD 03	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle GENERAL

IFD 03	INDICATOR	
IFD 03.1	Indicate whether you set social targets for your organisation, specific to inclusive finance.	
	❍ Yes	❍ No
IFD 03.2	Additional information [OPTIONAL]	

IFD 03	EXPLANATORY NOTES
IFD 03	Example social targets can be found here

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IFD 04	Indicator status MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	Purpose GATEWAY	Principle GENERAL

IFD 04	INDICATOR		
IFD 04.1	Of your total assets invested directly in inclusive finance, indicate what percentage is invested in the following.		
	Equity	❍ 0% ❍ <20% ❍ 20-40% ❍ 41-60% ❍ 61-80% ❍ >80%	
	Debt	❍ 0% ❍ <20% ❍ 20-40% ❍ 41-60% ❍ 61-80% ❍ >80%	Of which, percentage of subordinated debt ❍ 0% ❍ <20% ❍ 20-40% ❍ 41-60% ❍ 61-80% ❍ >80%
	Guarantees	❍ 0% ❍ <20% ❍ 20-40% ❍ 41-60% ❍ 61-80% ❍ >80%	
	Other; specify_____	❍ 0% ❍ <20% ❍ 20-40% ❍ 41-60% ❍ 61-80% ❍ >80%	
	Total	**100%**	
IFD 04.2	Additional information [OPTIONAL]		

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IFD 04	EXPLANATORY NOTES
IFD 04	Please note that the ranges in this module differ from those in other modules of the Reporting Framework. The ranges used here are aligned with the Symbiotics and MicroRate MIV Surveys. **Equity** (aligned with MIV Disclosure Guideline 2.2.1.3). Calculate as the sum of equity investments. Equity refers to stock purchases in inclusive finance providers, with or without voting rights. **Debt** (aligned with MIV Disclosure Guideline 2.2.1.4). Calculate as the sum of debt investments. Debt investments are MIV loans or notes to inclusive finance providers or to non-specialised financial intermediaries specifically used to fund inclusive finance (i.e., senior, junior, convertible and subordinate debt). **Subordinated debt** Calculate as the sum of subordinated or junior debt investments. Senior debt takes precedence over subordinated or junior debt in the event of default. They are also MIV loans or notes to inclusive finance providers or to non-specialised financial intermediaries specifically used to fund inclusive finance. **Guarantees** (aligned with MIV Disclosure Guideline 2.2.1.5). Calculate as the sum of guarantees provided to inclusive finance providers. MIV guarantee refers to the amount guaranteed to microfinance service providers as an instrument to enhance their creditworthiness.
LOGIC	
IFD 04	This is a gateway indicator, so your answer here determines which sections of the module are applicable. If you report ≥20% of your organisation's inclusive finance investments are in debt (irrespective of % subordinated), indicators [14-15] will be applicable. The fixed income options under indicator [17] will also become applicable. If you report ≥20% of your organisation's inclusive finance investments are in equity, indicators [16] and [22] will be applicable.

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IFD 05	Indicator status MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	Purpose GATEWAY	Principle GENERAL

IFD 05	INDICATOR	
IFD 05.1	Of your total assets invested directly in inclusive finance, indicate what percentage is invested in the following.	
	Microfinance	❍ 0% ❍ <20% ❍ 20-40% ❍ 41-60% ❍ 61-80% ❍ >80%
	SME finance (provide your definition of SME)_____	❍ 0% ❍ <20% ❍ 20-40% ❍ 41-60% ❍ 61-80% ❍ >80%
	Other; specify_____	❍ 0% ❍ <20% ❍ 20-40% ❍ 41-60% ❍ 61-80% ❍ >80%
	Total	**100%**
IFD 05.2	Additional information [OPTIONAL]	

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IFD 05	EXPLANATORY NOTES
IFD 05	**Microfinance:** the provision of diverse financial services to poor and low-income clients. Based on MIV Disclosure Guideline 2.1.2. As defined in the MIV Disclosure Guidelines, microcredit loan portfolios are characterized by their recipients (low-income borrowers who are typically self-employed or owners of tiny informal businesses and, in some cases, salaried workers), small average loan balance (defined as less than 250% of GNI per capita), a diversity of loan products (such as microenterprise, line of credit, housing, education, loans for immediate household needs) and alternative lending techniques that generally do not rely on conventional collateral. **SME:** small-and medium-sized enterprises (SMEs) are those with more than five but less than 250 employees (definition taken from the MIV Disclosure Guidelines). We recognise that definitions of SMEs vary from country to country, so when applicable in this supplement, we invite respondents to provide their own definitions. Inclusive finance in SMEs refers to investments made in financial institutions that finance SMEs, as opposed to direct investments in SMEs. **Other:** could include access to finance for housing purposes.
LOGIC	
IFD 05	This is a gateway indicator, so your answer here determines which sections of the module are applicable. If you report ≥20% of your total inclusive finance assets invested directly in microfinance, indicators [06-08] and [11-13] will be applicable.

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IFD 06	Indicator status MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	Purpose DESCRIPTIVE	Principle GENERAL

IFD 06	INDICATOR		
IFD 06.1	Indicate whether you track the geographical spread of your total assets invested directly in microfinance.		
	❍ Yes	❍ No	
IFD 06.2	Of your total assets invested directly in microfinance, indicate the geographic spread as a percentage of your portfolio.		
	Western Europe	❍ 0% ❍ <20% ❍ 20-40% ❍ 41-60% ❍ 61-80% ❍ >80%	**Indicate the average loan size (in US$) of your investees to active borrowers in this region.** ❑ We do not track this information.
	Eastern Europe and Central Asia	❍ 0% ❍ <20% ❍ 20-40% ❍ 41-60% ❍ 61-80% ❍ >80%	**Indicate the average loan size (in US$) of your investees to active borrowers in this region.** ❑ We do not track this information.
	North America	❍ 0% ❍ <20% ❍ 20-40% ❍ 41-60% ❍ 61-80% ❍ >80%	**Indicate the average loan size (in US$) of your investees to active borrowers in this region.** ❑ We do not track this information.
	Latin America (includes Central and South America) and Caribbean	❍ 0% ❍ <20% ❍ 20-40% ❍ 41-60% ❍ 61-80% ❍ >80%	**Indicate the average loan size (in US$) of your investees to active borrowers in this region.** ❑ We do not track this information.
	East Asia and Pacific	❍ 0% ❍ <20% ❍ 20-40% ❍ 41-60% ❍ 61-80% ❍ >80%	**Indicate the average loan size (in US$) of your investees to active borrowers in this region.** ❑ We do not track this information.

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	South Asia	❍ 0% ❍ <20% ❍ 20-40% ❍ 41-60% ❍ 61-80% ❍ >80%	**Indicate the average loan size (in US$) of your investees to active borrowers in this region.** ❑ We do not track this information.
	Middle East and North Africa	❍ 0% ❍ <20% ❍ 20-40% ❍ 41-60% ❍ 61-80% ❍ >80%	**Indicate the average loan size (in US$) of your investees to active borrowers in this region.** ❑ We do not track this information.
	Sub-Saharan Africa	❍ 0% ❍ <20% ❍ 20-40% ❍ 41-60% ❍ 61-80% ❍ >80%	**Indicate the average loan size (in US$) of your investees to active borrowers in this region.** ❑ We do not track this information.
IFD 06.3	Additional information [OPTIONAL]		

IFD 06	**EXPLANATORY NOTES**
IFI 06	Geographic spread as a percentage of your portfolio is based on MIV Disclosure Guideline indicators 2.2.3.1-6. Here, categories have been expanded to include Western Europe and North America. Based on MIV Disclosure Guideline 3.2.3, average loan size is a proxy indicator for the poverty level of clients of the microfinance service provider. 'Active borrowers' refer to individuals who currently have an outstanding loan balance with the microfinance service provider or are primarily responsible for repaying any portion of the gross loan portfolio. Individual who have multiple loans with a microfinance service provider should be counted as a single borrower. Calculate as follows: sum of total gross loan portfolio of each microfinance service provider in the direct portfolio/sum of number of active borrowers of each microfinance service provider in the direct portfolio.
LOGIC	
IFD 06	This indicator will be applicable if you reported that ≥20% of your total inclusive finance assets are invested directly in microfinance in [05]. [06.2] will be applicable if 'Yes' is reported in [06.1]

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SECTION

PIIF Principle 1: Range of services

Possible action

Develop and extend the range of financial services available to low-income populations. Extensions could include savings, loans, insurance, payment services, remittance facilities and pension plans.

IFD 07	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PIIF 1

IFD 07	INDICATOR	
IFD 07.1	Indicate whether you track the percentage of your microfinance investees' portfolio that is in microenterprise loans.	
	❍ Yes, we track.	**If you aggregate this information at an organisational level, indicate the percentage of your portfolio in microenterprise loans.** [OPTIONAL]
		❍ <20, ❍ 20-40, ❍ 41-60, ❍ 61-80, ❍ >80%
	❍ No, we do not track.	
	❍ Not applicable (there are no microenterprise loans in the portfolio).	
IFD 07.2	Indicate whether you track the percentage of your microfinance investees' portfolio that is in loans for immediate household needs (i.e., consumer loans).	
	❍ Yes, we track.	**If you aggregate this information at an organisational level, indicate the percentage of your portfolio in loans for immediate household needs.** [OPTIONAL]
		❍ <20, ❍ 20-40, ❍ 41-60, ❍ 61-80, ❍ >80%
	❍ No, we do not track.	
	❍ Not applicable (there are no loans for immediate household needs in the portfolio).	
IFD 07.3	Indicate whether you track the percentage of your investees' portfolio in housing loans.	
	❍ Yes, we track.	**If you aggregate this information at an organisational level, indicate the percentage of your portfolio in loans for other categories.** [OPTIONAL]
		❍ <20, ❍ 20-40, ❍ 41-60, ❍ 61-80, ❍ >80%
	❍ No, we do not track.	
	❍ Not applicable (there are no loans for housing in the portfolio).	

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IFD 07.4	Additional information [OPTIONAL]

IFD 07	**EXPLANATORY NOTES**
IFD 07	Please note that these categories are not exhaustive and therefore are not intended to necessarily sum to 100%.
IFD 07.1	This is based on MIV Disclosure Guideline 3.2.6.1. Microenterprise loans are loans made to finance a microenterprise (five or fewer employees). Calculate as follows: sum of microfinance service providers' gross loan portfolio (in the direct microfinance portfolio) dedicated to microenterprise loans/sum of gross loan portfolio of each microfinance service provider in the direct microfinance portfolio.
IFD 07.2	This is based on MIV Disclosure Guideline 3.2.6.2. Loans for immediate household needs are loans mainly destined to finance consumption and other household needs. Calculate as follows: sum of microfinance service providers' loan portfolio (in the direct microfinance portfolio) dedicated to loans for immediate household needs/sum of gross loan portfolio of each microfinance service provider in the direct microfinance portfolio.
LOGIC	
IFD 07	This indicator will be applicable if you reported that ≥20% of your total inclusive finance assets are invested directly in microfinance in [05].
ASSESSMENT	
IFD 07	Maximum score: Three ★ The assessment of this indicator is based on your responses to [07.1, 07.2 & 07.3].

Indicator scoring methodology

Selected response	**Level score**	**Further Details**
Do not track	○	
Track one option of three applicable options	★	
Track one out of two applicable options **OR** Two out of three applicable options	★★	
Track all applicable options	★★★	

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IFD 08	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PIIF 1

IFD 08	INDICATOR	
IFD 08.1	In your microfinance portfolio, indicate whether you support the provision of financial services beyond credit, compulsory savings and/or compulsory insurance.	
	❍ Yes	❍ No
IFD 08.2	Indicate which of the following services you support.	
	Voluntary savings products	
	Provide examples of how and what you support.	**Indicate whether you gather data regarding the percentage of financial service providers in your portfolio that are offering such a service.**
		❍ Yes ❍ No
		If you aggregate this information at an organisational level, indicate the percentage of microfinance providers in the MIV or organisational direct portfolio offering such products.
		❍ <20, ❍ 20-40, ❍ 41-60, ❍ 61-80, ❍ >80%
	Voluntary insurance products	
	Provide examples of how and what you support.	**Indicate whether you gather data regarding the percentage of financial service providers in your portfolio that are offering such a service.**
		❍ Yes ❍ No
		If you aggregate this information at an organisational level, indicate the percentage of microfinance providers in the MIV or organisational direct portfolio offering such products.
		❍ <20, ❍ 20-40, ❍ 41-60, ❍ 61-80, ❍ >80%
	Other financial services; specify_____	
	Provide examples of how and what you support.	**Indicate whether you gather data regarding the percentage of financial service providers in your portfolio that are offering such a service.**
		❍ Yes ❍ No
		If you aggregate this information at an organisational level, indicate the percentage of microfinance providers in the MIV or organisational direct portfolio offering such products.
		❍ <20, ❍ 20-40, ❍ 41-60, ❍ 61-80, ❍ >80%
	Non-financial services; specify_____	
	Provide examples of how and what you support.	**Indicate whether you gather data regarding the percentage of financial service providers in your portfolio that are offering such a service.**
		❍ Yes ❍ No

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		If you aggregate this information at an organisational level, indicate the percentage of microfinance providers in the MIV or organisational direct portfolio offering such products.
		❍ <20, ❍ 20-40, ❍ 41-60, ❍ 61-80, ❍ >80%
IFD 08.3	Additional information [OPTIONAL]	

IFD 08	**EXPLANATORY NOTES**
IFD 08.1	The PRI recognises that in some jurisdictions, microfinance service providers are not permitted to provide savings and other financial services products. Please indicate whether this is the case in your own portfolio in the box below. You can elaborate on your 'No' response there should you wish to. Percentage of inclusive finance portfolio offering in these categories can be calculated as: number of microfinance providers in the MIV or organisational direct portfolio offering such products/total number of microfinance service providers in the MIV or organisational direct portfolio. Savings products indicator is based on MIV Disclosure Guideline 3.2.7.1 and the MIX Market MFI data submission form. Microsavings products mainly refer to 1) current/checking accounts—an account that allows the holder to write cheques against deposited funds; 2) savings accounts—an account used to deposit money and earn interest on the account over time; 3) fixed-term deposits—deposits that cannot be withdrawn before a date specified at the time of deposit; and/or 4) special purpose savings accounts—a deposit account for private individuals to accrue money for a special purpose and receive interest on the deposited account. Savings required as a condition of an existing or future loan should not be included. Insurance indicator is based on MIV Disclosure Guideline 3.2.7.2 and the MIX Market MFI data submission form. Microinsurance refers mainly to the following four products: 1) credit life insurance—insurance issued to cover the life of a borrower for an outstanding loan. If the debtor dies prior to repayment of the debt, the policy will pay off the balance of the amount outstanding; 2) life insurance—insurance that guarantees a specific sum of money to a designated beneficiary upon the death of the insured or to the insured if he or she lives beyond a certain age; 3) house insurance—property insurance that covers losses occurring to one's home, its contents, loss of its use, or loss of other personal possessions of the homeowner; and/or 4) livestock and agriculture insurance—coverage for crops in the event of loss or damage and coverage for loss of domestic animals raised for home use or for profit, especially on a farm. Insurance required as a condition of an existing or future loan should not be included. Other financial services indicator is based on MIV Disclosure Guideline 3.2.7.3. Other financial services refer to services such as micro pensions, debit/credit cards, money transfers and payments by cheque. Non-financial services indicator is based on MIV Disclosure Guideline 3.2.8. Non-financial services refer to enterprise services, adult education, health services, agricultural extension and training and women's empowerment.
LOGIC	
IFD 08	This indicator will be applicable if you reported that ≥20% of your total inclusive finance assets are invested directly in microfinance in [05].

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	[08.2] will be applicable if 'Yes' is reported in [08.1].		
ASSESSMENT			
IFD 08	Maximum score: Three ★ The assessment of this indicator is based on your responses to [08.1 & 08.2].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	'No', we do not support the provision of financial services beyond credit, compulsory savings and/or compulsory insurance	⭘	
	'Yes', we support the provision of financial services beyond credit, compulsory savings and/or compulsory insurance but gather no data	★★	
	'Yes', we support the provision of financial services beyond credit, compulsory savings and/or compulsory insurance and gather data for at least one option	★★★	

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Possible action

Encourage providers to introduce innovative products tailored to needs of low-income clients.

Encourage providers to expand their service offering to more remote areas and more vulnerable populations.

IFD 09	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PIIF 1

IFD 09	INDICATOR		
IFD 09.1	Indicate whether you support the introduction of services tailored to the following client groups.		
	The very poor	❍ Yes	❍ No
		Describe how you support the introduction of such services.	
		Indicate what percentage of assets you know to be supporting these clients.	
		❍ <20, ❍ 20-40, ❍ 41-60, ❍ 61-80, ❍ >80% ❍ We track at the investee level but do not aggregate this information. ❍ We do not track at the investee level.	
	The poor	❍ Yes	❍ No
		Describe how you support the introduction of such services.	
		Indicate what percentage of assets you know to be supporting these clients.	
		❍ <20, ❍ 20-40, ❍ 41-60, ❍ 61-80, ❍ >80% ❍ We track at the investee level but do not aggregate this information. ❍ We do not track at the investee level.	
	Low income clients	❍ Yes	❍ No
		Describe how you support the introduction of such services.	
		Indicate what percentage of assets you know to be supporting these clients.	
		❍ <20, ❍ 20-40, ❍ 41-60, ❍ 61-80, ❍ >80% ❍ We track at the investee level but do not aggregate this information.	

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		❍ We do not track at the investee level.	
	Other; specify_____	❍ Yes	❍ No
		Describe how you support the introduction of such services.	
		Indicate what percentage of assets you know to be supporting these clients.	
		❍ <20, ❍ 20-40, ❍ 41-60, ❍ 61-80, ❍ >80% ❍ We track at the investee level but do not aggregate this information. ❍ We do not track at the investee level.	
IFD 09.2	Indicate whether you collect data regarding the percentage or number of total active clients that fall into the following categories.		
	Rural	❍ Yes	❍ No
		Indicate what percentage of your direct portfolio this represents.	
		❍ <20, ❍ 20-40, ❍ 41-60, ❍ 61-80, ❍ >80%	
	Urban	❍ Yes	❍ No
		Indicate what percentage of your direct portfolio this represents.	
		❍ <20, ❍ 20-40, ❍ 41-60, ❍ 61-80, ❍ >80%	
	Female	❍ Yes	❍ No
		Indicate what percentage of your direct portfolio this represents.	
		❍ <20, ❍ 20-40, ❍ 41-60, ❍ 61-80, ❍ >80%	
IFD 09.3	Additional information [OPTIONAL]		

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IFD 09	EXPLANATORY NOTES
IFD 09	There are various ways of supporting the introduction of such services, for example, via incentives or the provision of technical assistance to support the retail provider in developing such services. Rural indicator is based on MIV Disclosure Guideline 3.2.4.1. Rural areas are settled places outside towns and cities such as villages and hamlets, where most livelihoods are farm-based. 'Farm' includes both crop and non-crop agriculture, e.g., livestock, fishing. Calculate as: sum of number of rural clients of each microfinance service provider in the MIV or organisational direct portfolio/sum of number of active clients of each microfinance service provider in the MIV or organisational direct portfolio. Urban indicator is based on MIV Disclosure Guideline 3.2.4.2. Areas constituting a city or town have higher density of population compared to the surrounding areas, and the majority of residents do not depend on agriculture as their main economic activity. Calculate as: sum of number of urban clients of each microfinance service provider in the MIV or organisational direct portfolio/sum of number of active clients of each microfinance service provider in the MIV or organisational direct portfolio. Gender indicator is based on MIV Disclosure Guideline 3.2.5.1. Share of female borrowers in all active borrowers. Calculate as: sum of number of female borrowers of each microfinance service provider in the MIV or organisational direct portfolio/sum of number of male and female (excluding legal entities) active borrowers of each microfinance service provider in the MIV or organisational portfolio.

ASSESSMENT

IFD 09	Maximum score: Three ★ The assessment of this indicator is based on your responses to [09.1 & 09.2].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	All 'No'	○	
	Support the introduction of services for at least one of the client groups listed (IFD 09.1) **OR** Collect the % of clients that are either rural, urban or female (IFD 09.2)	★	
	Support the introduction of services for at least one of the client groups listed and Collect the % of clients that are either rural, urban or female **OR** Support the introduction of services for at least one of the client groups listed and provide the % for at least one service	★★	
	Support the introduction of services for at least one of the client groups listed and provide the % for at least one service **AND** Collect the % of clients that are either rural, urban or female	★★★	

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IFD 09	DEFINITIONS
The very poor	Definition from the Impact Reporting & Investment Standards (IRIS): "The very poor are people living below a recognized absolute extreme poverty line. Commonly recognized extreme poverty lines include (1) persons in the bottom 50% of those living below the poverty line established by the national government, (2) persons living on less than US $1.00 per day (technically $1.08 per day per capita at 1993 Purchasing Power Parity (PPP) or on less than of US $1.25 per day at 2005 PPP), or (3) the USAID extreme poverty line, which varies by country". For updates about poverty lines and Purchasing Power Parity, visit the website: www.povertytools.org.
The poor	Definition from the Impact Reporting & Investment Standards (IRIS): "The poor are people living below a recognized poverty line. Commonly recognized poverty lines include (1) persons living below the poverty line established by the national government, or (2) persons living on less than US $2.00 per day in daily per-capita expenditures at 1993 Purchasing Power Parity." For any update about poverty lines and Purchasing Power Parity visit the website: www.povertytools.org.
Low income	Definition from the Impact Reporting & Investment Standards (IRIS): "Low-income people are individuals living above the poverty line but below the national median income." For updates about poverty lines and Purchasing Power Parity, visit: www.povertytools.org.

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Possible action

Supporting retail providers.

IFD 10	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle PIIF 1

IFD 10	INDICATOR	
IFD 10.1	Indicate whether you provide technical assistance to your investees.	
	❍ Yes	❍ No
IFD 10.2	Additional information [OPTIONAL]	

IFD 10	**EXPLANATORY NOTES**
IFD 10.1	IFD 10.1 is aligned with MIV Disclosure Guideline 1.3.9. Technical assistance could be provided direct or via a third party.
IFD 10.2	You may wish to specify the type of technical assistance provided during the reporting year and the extent of the resources allocated.

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SECTION

PIIF Principle 2: Client protection

Possible action

Publicly endorse the Client Protection Principles (CPP).

IFD 11	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PIIF 2

IFD 11	INDICATOR	
IFD 11.1	Indicate whether you have publicly endorsed the Client Protection Principles.	
	❍ Yes	❍ No
IFD 11.2	Additional information [OPTIONAL]	

IFD 11	EXPLANATORY NOTES		
IFD 11.1	IFD 11.1 is aligned with MIV Disclosure Guideline 3.2.10.1. The Client Protection Principles are part of the Smart Campaign, a microfinance industry-wide initiative that encourages investors to ensure that low-income clients are treated fairly and protected from harmful financial products: http://www.smartcampaign.org/.		
LOGIC			
IFD 11	This indicator will be applicable if you reported that ≥20% of your total inclusive finance assets are invested directly in microfinance in [05].		
ASSESSMENT			
IFD 11	Maximum score: Three ★ The assessment of this indicator is based on your responses to [11.1].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	'No'	⊙	
	'Yes'	★★★	

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IFD 12	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PIIF 2

IFD 12	INDICATOR	
IFD 12.1	Indicate whether you provide training or assistance for your investees in implementing the Client Protection Principles and/or other client protection measures.	
	❍ Yes	❍ No
IFD 12.2	Additional information [OPTIONAL]	

IFD 12	EXPLANATORY NOTES		
IFD 12.1	Training or assistance can be provided direct or via partners. Quantifying could involve the number and duration of training days provided and to what number of people during the reporting period. This assistance could also include the number of assessments or certifications co-financed/supported.		
LOGIC			
IFD 12	This indicator will be applicable if you reported that ≥20% of your total inclusive finance assets are invested directly in microfinance in [05].		
ASSESSMENT			
IFD 12	Maximum score: Three ★ The assessment of this indicator is based on your responses to [12.1].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	'No'	⭘	
	'Yes'	★★★	

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IFD 13	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PIIF 2

IFD 13	INDICATOR	
IFD 13.1	Indicate whether you include the Client Protection Principles and/or other client protection measures in your investment policies.	
	❍ Yes	❍ No
IFD 13.2	Indicate whether this is systematically applied.	
	During due diligence	
	❍ Yes	❍ No
	In covenants in loan agreements and/or in financing or shareholder agreements	
	❍ Yes	❍ No
IFD 13.3	Indicate whether you encourage investees to apply for Client Protection Certification. [OPTIONAL]	
	❍ Yes	❍ No
IFD 13.4	Additional information [OPTIONAL]	

IFD 13	EXPLANATORY NOTES
IFD 13.1 and 13.2	IFD 13.1 and 13.2 based on MIV Disclosure Guideline 3.2.10.2.
IFD 13.3	The Client Protection Certification is an independent, third-party evaluation to publicly recognize financial institutions that meet adequate standards of care in how they treat clients. It enables financial institutions to demonstrate adherence to the microfinance industry's Client Protection Principles. It contributes to a more stable microfinance industry by encouraging practices that aim to ensure prudent, transparent and respectful treatment of clients. Encouraging investees to apply for Client Protection Certification could include making funding contingent on certification (e.g., being certified to receive funding or having a timeframe within which to achieve certification). http://smartcampaign.org/certification
LOGIC	
IFD 13	This indicator will be applicable if you reported that ≥20% of your total inclusive finance assets are invested directly in microfinance in [05]. [13.2] and [13.3] will be applicable if 'Yes' is reported in [13.1].
ASSESSMENT	
IFD 13	Maximum score: Three ★ The assessment of this indicator is based on your responses to [13.1, 13.2 & 13.3].
	Indicator scoring methodology

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	Selected response	**Level score**	**Further Details**
	'No' we do not include the CPP and/or other client protection measures in our investment policies	⭘	
	'Yes' we include the CPP and/or other client protection measures in our investment policies	★	
	'Yes' we include the CPP and/or other client protection measures in our investment policies and systematically apply them **either** during due diligence **OR** in covenants in loan agreements and/or in financing or shareholder agreements	★★	
	'Yes' we include the CPP and/or other client protection measures in our investment policies and systematically apply them **both** during due diligence **and** in covenants in loan agreements and/or in financing or shareholder agreements	★★★	

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SECTION

PIIF Principle 3: Fair treatment

Possible action

Provide financing in an appropriate currency and tenor.

IFD 14	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PIIF 3

IFD 14	INDICATOR	
IFD 14.1	In relationship to your direct portfolio in debt, indicate whether you provide investment in local currency.	
	❍ Yes	❍ No
IFD 14.2	Indicate what percentage of your direct portfolio in debt is invested in the investee's local currency.	
	❍ <20, ❍ 20-40, ❍ 41-60, ❍ 61-80, ❍ >80%	
IFD 14.3	Additional information [OPTIONAL]	

IFD 14	EXPLANATORY NOTES		
IFD 14	This indicator is only applicable if you have direct debt investments.		
IFD 14.2	IFD 14.2 is based on MIV Disclosure Guideline 2.2.2.7.		
IFD 14.3	For example, if you do not provide loans in foreign currency, you may wish to describe whether you take any measures to help your investees in managing the foreign exchange rate.		
LOGIC			
IFD 14	This indicator will be applicable if you reported ≥20% of your organisation's inclusive finance investments are in debt in [04]. Within this indicator, [14.2] will be applicable if you report 'Yes' to [14.1].		
ASSESSMENT			
IFD 14	Maximum score: Three ★ The assessment of this indicator is based on your responses to [14.1 & 14.2].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**

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	‘No’ or ≤20%	⭘	
	21-40%	★	
	41-60%	★★	
	>60%	★★★	

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PRI Principles for Responsible Investment

Possible action

Provide financing in an appropriate currency and tenor.

Actively support the building of a diversified funding base.

IFD 15	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle PIIF 3

IFD 15	INDICATOR	
IFD 15.1	In relation to your direct portfolio in debt, indicate what percentage have a maturity (from the point of investment) of the specified duration:	
	❑ 12 months or fewer	**Indicate percentage.** ❍ <20, ❍ 20-40, ❍ 41-60, ❍ 61-80, ❍ >80%
	❑ 13 to 24 months	**Indicate percentage.** ❍ <20, ❍ 20-40, ❍ 41-60, ❍ 61-80, ❍ >80%
	❑ 25 to 60 months	**Indicate percentage.** ❍ <20, ❍ 20-40, ❍ 41-60, ❍ 61-80, ❍ >80%
	❑ More than 60 months	**Indicate percentage.** ❍ <20, ❍ 20-40, ❍ 41-60, ❍ 61-80, ❍ >80%
IFD 15.2	Indicate whether you have a set limit regarding the maximum fixed income investment exposure of the investees in which you invest. [OPTIONAL]	
	❍ Yes	❍ No
IFD 15.3	Additional information [OPTIONAL]	

IFD 15	**EXPLANATORY NOTES**
IFD 15	This indicator is only applicable if you have direct debt investments.
IFD 15.2	This refers to the maximum percentage of the investee's total debt that is provided by the respondent in any one investment.
LOGIC	
IFD 15	This indicator will be applicable if you reported ≥20% of your organisation's inclusive finance investments are in debt in [04].

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Possible action

Provide financing in an appropriate currency and tenor

Actively support the building of a diversified funding base

IFD 16	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PIIF 3

IFD 16	INDICATOR	
IFD 16.1	In relation to your direct portfolio in equity (as reported in IFD 04), indicate the average holding period of an equity investment. ❑ 12 months or fewer ❑ 13 to 24 months ❑ 25 to 60 months ❑ More than 60 months	
IFD 16.2	Indicate whether you have specific policies or procedures in relation to responsible approaches to exit.	
	❍ Yes	❍ No
IFD 16.3	Indicate whether you publish policies or procedures in relation to responsible approaches to exit. Provide a URL. [OPTIONAL]	
IFD 16.4	Indicate whether you have specific policies or procedures on Return on Equity (ROE) targets or caps in relation to your equity investments.	
	❍ Yes	❍ No
IFD 16.5	Indicate if you publish policies or procedures on Return on Equity (ROE) targets or caps in relation to your equity investments. Provide a URL. [OPTIONAL]	
IFD 16.6	Indicate your Return on Equity (ROE) targets; specifying different targets for different funds if applicable. [OPTIONAL]	
IFD 16.7	Indicate whether you have a set limit regarding the maximum equity investment exposure of the investees in which you invest.	
	❍ Yes	❍ No
IFD 16.8	Additional information [OPTIONAL]	

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IFD 16	EXPLANATORY NOTES
IFD 16	This indicator is only applicable if you have direct equity investments.
IFD 16.4 and 16.6	This refers to targets or caps at the fund level, i.e., to your organisation as opposed to the individual investment. For mixed funds, this indicator would apply if the fund has >50% in equity.
IFD 16.7	This refers to the maximum percentage of the investee's total equity capital provided by the respondent in any one investment.
LOGIC	
IFD 16	This indicator will be applicable if you reported ≥20% of your organisation's inclusive finance investments are in equity in [04]. Within this indicator, [16.3] will be applicable if you report 'Yes' to [16.2], and [16.5] will be applicable if you report 'Yes' to [16.4].
ASSESSMENT	
IFD 16	Maximum score: Three ★ The assessment of this indicator is based on your responses to [16.2] and [16.4].

Indicator scoring methodology

Selected response	Level score	Further Details
Do not have specific policies or procedures on exits or (ROE) targets	○	
Have specific policies or procedures on either exits **OR** (ROE) targets	★	
Have specific policies or procedures on **both** exits **and** (ROE) targets	★★	
Have specific policies or procedures on **both** exits **and** (ROE) targets and **publish** at least one of them	★★★	

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Possible action

Negotiate terms and conditions that are transparent, fair and reasonable, including fair break-up clauses.

IFD 17	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PIIF 3

IFD 17	INDICATOR			
IFD 17.1	Indicate whether you adopt the following practices.			
	❑ For fixed income investments: Use the Lenders' Guidelines for Setting Covenants in Support of Responsible Microfinance as an example or reference document.		**Indicate whether these practices are formalised in written policies and procedures**.	
			❍ Yes	❍ No
	❑ Ensure that the investee understands the terms, covenants and their implications prior to signing loan/shareholder documentation.	**Describe your process**.	**Indicate whether these practices are formalised in written policies and procedures.**	
			❍ Yes	❍ No
	❑ Foster trust and proactive dialogue with investees through straightforward discussions of issues such as a covenant breach.	**Describe your process**.	**Indicate whether these practices are formalised in written policies and procedures.**	
			❍ Yes	❍ No
	❑ In the case of material covenant breach, create/participate in a voluntary workout group when applicable, with the goal to help the investee remain a going concern whenever possible.		**Indicate whether these practices are formalised in written policies and procedures.**	
			❍ Yes	❍ No
	❑ For fixed income investments: Train your staff on effective monitoring and covenant waiver negotiations to manage deteriorating conditions, and transition a non-performing loan from loan origination staff to specialised workout staff.		**Indicate whether these practices are formalised in written policies and procedures.**	
			❍ Yes	❍ No
			Indicate whether these practices are formalised in written policies and procedures.	

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	❑ Encourage investee skills-building on financial projections, scenario planning and stress-testing for management, and financial expertise and governance for directors.	❍ Yes	❍ No
	❑ Other; explain _____	**Indicate whether these practices are formalised in written policies and procedures.**	
		❍ Yes	❍ No
	❑ None of the above		
IFD 17.2	Additional information [OPTIONAL]		

IFD 17	**EXPLANATORY NOTES**
IFD 17	The Lenders' Guidelines for Setting Covenants in Support of Responsible Microfinance provide guidance of specific reasonable covenants for fixed income investors, i.e., covenants that can contribute to ensuring that MFI investees adopt a "responsible financing" behaviour that can ensure that their end clients are not harmed.
IFD 17.1	Options 'Use the Lenders' Guidelines for Setting Covenants in Support of Responsible Microfinance as an example or reference document' and 'Train your staff on effective monitoring and covenant waiver negotiations to manage deteriorating conditions, and transition a non-performing loan from loan origination staff to specialised workout staff' will only applicable if you have direct debt investments.
LOGIC	
IFD 17	The following options are applicable if you reported ≥20% of your organisation's inclusive finance investments are in debt in [04]. • For fixed income investments: Use the Lenders' Guidelines for Setting Covenants in Support of Responsible Microfinance as an example or reference document. • For fixed income investments: Train your staff on effective monitoring and covenant waiver negotiations to manage deteriorating conditions, and transition a non-performing loan from loan origination staff to specialised workout staff.
ASSESSMENT	
IFD 17	Maximum score: Three ★ The assessment of this indicator is based on your responses to [17.1].

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	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	'None of the above'	⭘	
	One 'yes' selection	★	
	Two 'yes' selection	★★	
	Three or more options selected	★★★	

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SECTION

PIIF Principle 4: Responsible Investment

Possible action

Use the Social Performance Task Force standards and tools to measure and report on social performance.

IFD 18	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle PIIF 4

IFD 18	INDICATOR		
IFD 18.1	Indicate whether you use the following tools for social performance reporting.		
	Externally developed tools		
	During due diligence		
	❍ Yes	❍ No	❍ We don't track social performance.
	For monitoring and reporting purposes		
	❍ Yes	❍ No	❍ We don't track social performance.
	Describe the approaches used and frequency of use. [OPTIONAL]		
	In-house tools based on externally developed tools		
	During due diligence		
	❍ Yes	❍ No	❍ We don't track social performance.
	For monitoring and reporting purposes		
	❍ Yes	❍ No	❍ We don't track social performance.
	Describe the approaches used and frequency of use. [OPTIONAL]		
	Tools developed solely in-house		
	During due diligence		
	❍ Yes	❍ No	❍ We don't track social performance.
	For monitoring and reporting purposes		
	❍ Yes	❍ No	❍ We don't track social performance.

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	Describe the approaches used and frequency of use. [OPTIONAL]
IFD 18.2	Additional information [OPTIONAL]

IFD 18	**EXPLANATORY NOTES**
IFD 18	Social performance is the effective translation of an institution's mission into practice in line with accepted social values (SPTF definition). It is about making an organisation's social mission a reality. It may include serving larger numbers of poor and excluded people; improving the quality and appropriateness of financial services; creating benefits for clients; and improving social responsibility of an MFI. Externally developed tools: See the Universal Standards for Social Performance Management, a set of management standards that apply to all microfinance institutions pursing a double bottom line.
LOGIC	
IFD 18	Indicators [28-31] will be applicable if you report using any tools in this indicator (in house and/or externally developed).

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IFD 19	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle PIIF 4

IFD 19	INDICATOR	
IFD 19.1	Indicate whether you require the retail institutions in which you invest to have an independent financial rating.	
	❍ Always ❍ In a majority of cases ❍ In a minority of cases ❍ No	
IFD 19.2	Indicate whether you require the retail institutions in which you invest to have an independent social rating.	
	❍ Always ❍ In a majority of cases ❍ In a minority of cases ❍ No	
IFD 19.3	Indicate whether you require the retail institutions in which you invest to have an independent social audit.	
	❍ Yes	❍ No
IFD 19.4	Additional information [OPTIONAL]	

IFD 19	EXPLANATORY NOTES
IFD 19	Use of independent audits and ratings is in addition to financial accounting. *Financial ratings* Financial performance ratings not only measure the MFI´s creditworthiness, but also its trustworthiness and excellence in microfinance. They incorporate features of a credit rating but also include a deeper level of analysis to evaluate the institution´s effectiveness in reaching micro entrepreneurs with high quality loans. A financial performance rating is typically an integral assessment of the MFI´s global performance (strengths and weaknesses). The performance is awarded a rating or grade according to the evaluator´s own scale. The Microfinance Institutional Rating (MIR) is provided by all four specialist microfinance rating agencies and incorporates client protection indicators. For more information about ratings and providers, see www.ratinginitiative.org. *Social audits/ratings* Social audits/ratings are an independent assessment of an MFI´s social performance. Social audits/ratings assess both social risk (the risk of not achieving its social mission) and social performance (the likelihood of contributing social value). The main difference between an audit and a rating is that in the latter, the performance is awarded a rating or grade according to the evaluator´s own scale.

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PRI Principles for Responsible Investment

Possible action:

Assist in developing appropriate references for corporate governance issues.

IFD 20	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PIIF 4

IFD 20	INDICATOR		
IFD 20.1	In relation to your due diligence on and monitoring and reporting of corporate governance among investees, indicate whether you assess the following.		
	Compensation of the board of directors and executive directors (i.e., its transparency, the use of benchmarking)		
	Pre-investment		
	❍ Yes	❍ No	❍ Not for all of our investments in inclusive finance
	Post-investment		
	❍ Yes	❍ No	❍ Not for all of our investments in inclusive finance
	Describe what you look at and, if post-investment, the frequency of assessment. [OPTIONAL]		
	Composition of the board (i.e., breadth and depth of experience, effective client representation, diversity)		
	Pre-investment		
	❍ Yes	❍ No	❍ Not for all of our investments in inclusive finance
	Post-investment		
	❍ Yes	❍ No	❍ Not for all of our investments in inclusive finance
	Describe what you look at and, if post-investment, the frequency of assessment. [OPTIONAL]		
	Whether the board receives social performance management-related information from the management team that is analysed and contributes to board decision-making.		
	Pre-investment		
	❍ Yes	❍ No	❍ Not for all of our investments in inclusive finance

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	Post-investment		
	❍ Yes	❍ No	❍ Not for all of our investments in inclusive finance
	Describe what you look at and, if post-investment, the frequency of assessment. [OPTIONAL]		
IFD 20.2	Additional information [OPTIONAL]		

IFD 20	**EXPLANATORY NOTES**
IFD 20	Not for all of our investments in inclusive finance: Some of these processes may look different for different entities beyond microfinance in which you may invest, such as banks and holding companies. If so, please indicate that this is the case in IFD 20.2.
ASSESSMENT	
IFD 20	Maximum score: Three ★ The assessment of this indicator is based on your responses to [20.1].

	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	All 'No'	⭘	
	Less than three 'Yes's' in either pre/post-investment **OR** Less than five 'Not for all investments' in either pre/post-investment	★	
	Three to four 'Yes's' in either pre/post-investment **OR** More than four 'Not for all investments' in either pre/post-investment	★★	
	More than four 'Yes's' in either pre/post-investment	★★★	

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PRI Principles for Responsible Investment

Possible action

Assist in developing appropriate references for corporate governance issues.

IFD 21	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle PIIF 4

IFD 21	INDICATOR	
IFD 21.1	Indicate whether you provide training or assistance for your investees on corporate governance.	
	❍ Yes	❍ No
IFD 21.2	Additional information [OPTIONAL]	

IFD 21	**EXPLANATORY NOTES**
IFD 21.1	IFD 21.1 relates to support provided over and above taking a board position and/or participating in governance structures. Training or assistance can be provided direct or via a third party.
IFD 21.2	IFD 21.2: Training or assistance can be provided direct or via partners. Quantifying could involve the number and duration of training days provided and to what number of people during the reporting period. If you have provided training or assistance during the reporting period, please quantify when possible and if and how your policy differs for debt and equity investments.

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Possible action

Assist in developing appropriate references for corporate governance issues.

IFD 22	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle PIIF 4

IFD 22	INDICATOR
IFD 22.1	In relation to your direct portfolio in equity (as reported in IFD 04), indicate what percentage of investees you either have board seats with, or with which you have selected a board member. ❍ <20, ❍ 20-40, ❍ 41-60, ❍ 61-80, ❍ >80% ❑ We do not track this information.
IFD 22.2	Indicate how frequently you participate in meetings. ❍ Monthly or more ❍ Quarterly ❍ Semi-annually ❍ Annually ❍ Every two years or less ❍ Ad hoc ❍ We do not track this information.
IFD 22.3	For those equity investments in which you do not hold board seats, indicate how you attain or maintain influence.
IFD 22.4	Additional information [OPTIONAL]

IFD 22	**EXPLANATORY NOTES**
IFD 22.1	This indicator is only applicable if you have direct equity investments.
LOGIC	
IFD 22	This indicator will be applicable if you reported ≥20% of your organisation's inclusive finance investments are in equity in [04]. Within this indicator, [22.2] is applicable if you report ≥20% in [22.1].

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Possible action

Assist in developing appropriate references for environmental issues.

IFD 23	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PIIF 4

IFD 23	INDICATOR
IFD 23.1	Indicate whether you have a procedure to integrate the consideration of environmental issues in your investment decision processes. ❍ Yes ❍ for all inclusive finance investments ❍ for a majority of inclusive finance investments ❍ for a minority of inclusive finance investments ❍ No
IFD 23.2	Describe how your procedure to integrate the consideration of environmental issues in your investment decisions processes affects decisions pre-investment. [OPTIONAL]
IFD 23.3	Describe how your procedure to integrate the consideration of environmental issues in your investment decisions processes affects decisions post- investment. [OPTIONAL]
IFD 23.4	Indicate whether you ask your investees to comply with an environmental exclusion list. ❍ Yes, for all investees ❍ Yes, for a majority of investees ❍ Yes, for a minority of investees ❍ No
IFD 23.5	Additional information [OPTIONAL]

IFD 23	EXPLANATORY NOTES
IFD 23.1	IFD 23.1 is based on MIV Disclosure Guideline 3.1.3. Common environmental issues associated with inclusive finance investments include pollution (waste, water, air), use of chemicals and pesticides, use of energy and destruction of forest (brick-burning, charcoal production and wood logging). For further information and guidance, FMO has produced MFI and SME Sustainability and Guidance tools, primarily designed for MFIs and SME banks, that explain how to implement E&S evaluations and follow-up processes in alignment.
IFD 23.4	IFD 23.4 is aligned with MIV Disclosure Guideline 3.1.2. An environmental exclusion list refers to a set of minimum environmental standards/practices and/or a list of activities that cannot be financed by the investee because of risks on the environment.

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LOGIC			
IFD 23	[23.2] and [23.3] will be applicable if 'Yes' is reported in [23.1].		
ASSESSMENT			
IFD 23	Maximum score: Three ★ The assessment of this indicator is based on your responses to [23.1].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	'No'	⭘	
	'Yes, for a minority of inclusive finance investments'	★	
	'Yes, for a majority of inclusive finance investments'	★★	
	'Yes, for all inclusive finance investments'	★★★	

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Possible action

Promote implementation of anti-corruption practices.

IFD 24	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PIIF 4

IFD 24	INDICATOR	
IFD 24.1	Indicate whether you have anti-corruption policies. ❍ Yes, published ❍ Yes, but not published ❍ No	
IFD 24.2	Indicate whether you have internal whistle-blowing policies. ❍ Yes, published ❍ Yes, but not published ❍ No	
IFD 24.3	Indicate whether you review whether your investees have anti-corruption policies as part of your due diligence process.	
	❍ Yes	❍ No
IFD 24.4	Indicate whether you review whether your investees have internal whistle-blowing policies as part of your due diligence process.	
	❍ Yes	❍ No
IFD 24.5	Additional information [OPTIONAL]	

IFD 24	EXPLANATORY NOTES		
IFD 24.5	For example, if you do promote the implementation of anti-corruption policies, please describe how.		
ASSESSMENT			
IFD 24	Maximum score: Three ★ The assessment of this indicator is based on your responses to [24.1 & 24.2].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	Do not have anti-corruption policies OR internal whistle-blowing policies	⭘	
	Have either anti-corruption policy OR internal whistle-blowing policy	★	

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	Have both anti-corruption policies and internal whistle-blowing policies	★★	
	Have anti-corruption policies and internal whistle-blowing policies and both are published	★★★	

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SECTION

PIIF Principle 5: Transparency

Possible action

Fully disclose policies, criteria and related conditions of products and services to investees and other relevant stakeholders.

IFD 25	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PIIF 5

IFD 25	INDICATOR
IFD 25.1	Indicate how your mission and investment objectives are communicated to stakeholders (e.g., investees, investors). ❍ Publicly, Provide a URL:_____ ❍ Selected stakeholders only ❍ On request only
IFD 25.2	Additional information [OPTIONAL]

IFD 25	**EXPLANATORY NOTES**		
ASSESSMENT			
IFD 25	Maximum score: Three ★ The assessment of this indicator is based on your responses to [25.1].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	No response	⭘	
	Mission and objectives provided on request only	★	
	Mission and objectives provided to selected stakeholders only	★★	
	Mission and objectives communicated publicly	★★★	

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PRI Principles for Responsible Investment

Possible action

Fully disclose policies, criteria and related conditions of products and services to investees and other relevant stakeholders.

IFD 26	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PIIF 5

IFD 26	INDICATOR	
IFD 26.1	Other than the PRI/PIIF, indicate whether you provide your investors and/or the public with information aligned with industry standards.	
	❍ Yes	❍ No
IFD 26.2	Do you provide information aligned with:	
	❑ The MIV Disclosure Guidelines. ❍ Yes, to our investors only ❍ Yes, to the public ❑ The Impact Reporting & Investment Standards (IRIS). ❍ Yes, to our investors only ❍ Yes, to the public ❑ Other; specify_____ ❍ Yes, to our investors only ❍ Yes, to the public	
IFD 26.3	Additional information [OPTIONAL]	

IFD 26	EXPLANATORY NOTES
IFD 26.1	The MIV Disclosure Guidelines provide a set of standardised indicators against which microfinance investment institutions/vehicles (see Appendix 1 for definitions and guidance) can disclose. Disclosure includes information on MIVs' profiles, including legal information, investment strategy, selected indicators to assess financial performance and ESG policies. For the full set of MIV Disclosure Guidelines, see http://www.cgap.org/research/publication/microfinance-investment-vehicles-disclosure-guidelines Impact Reporting & Investment Standards (IRIS) is a common language for describing the social and environmental performance of an organisation. IRIS provides an independent and credible set of metrics for organisations to use when reporting their impact. IRIS indicators span an array of performance objectives and include specialised metrics for a range of sectors, including financial services: http://iris.thegiin.org/.
IFD 26.3	For example, if applicable, please explain whether you prioritise any industry standards and/or indicators in particular and the percentage of your assets that such reporting covers.
LOGIC	
IFD 26.2	[IFD 26.2] will be applicable if you report 'Yes' in [IFD 26.1]
ASSESSMENT	

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IFD 26	Maximum score: Three ★ The assessment of this indicator is based on your responses to [26.1 & 26.2].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	'No'	⭘	
	'Yes, to investors only'	★★	Aligned with at least one standard or guideline
	'Yes, to public'	★★★	Aligned with at least one standard or guideline

Possible action

Ensure that investees adequately disclose the pricing, terms and conditions of financial products and services offered and that the pricing, terms and conditions are understood by clients.

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IFD 27	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PIIF 5

IFD 27	INDICATOR	
IFD 27.1	Indicate whether you encourage the retail institutions in which you invest to ensure that the following are transparent and fully explained to their clients (i.e., those seeking financial services from them) in a form they can understand.	
	Pricing	
	❍ Yes	❍ No
	Other terms and conditions	
	❍ Yes	❍ No
IFD 27.2	Indicate how you ensure this for pricing and provide examples.	
IFD 27.3	Indicate how you ensure this for other terms/conditions and provide examples.	
IFD 27.4	Additional information [OPTIONAL]	

IFD 27	EXPLANATORY NOTES		
IFD 27.1	For example, encouraging transparent pricing could include encouraging the use by investees of declining balance rates on loans; and/or encouraging the disclosure of investees' interest rates (APR and effective interest rates) and all additional fees on the institutions' website and in loan documentation.		
LOGIC			
IFD 27	[IFD 27.2] will be applicable if you report 'Yes' for 'pricing' in [IFD 27.1] [IFD 27.3] will be applicable if you report 'Yes' for 'other terms and conditions' in [IFD 27.1]		
ASSESSMENT			
IFD 27	Maximum score: Three ★ The assessment of this indicator is based on your responses to [27.2 & 27.3].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	Both 'No'	⭘	
	Either 'Yes'	★★	
	Both 'Yes'	★★★	

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PRI Principles for Responsible Investment

SECTION

PIIF Principle 6: Balanced returns

Possible action

Strive for a balanced long-term social and financial risk-adjusted return that recognises the interests of clients, retail providers and investors.

IFD 28	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PIIF 6

IFD 28	INDICATOR	
IFD 28.1	Indicate whether the social performance of investees affects the following.	
	Investment decision-making	
	❍ Yes	❍ No
	Portfolio management	
	❍ Yes	❍ No
IFD 28.2	Explain how social performance of investees affects investment decision-making.	
IFD 28.3	Explain how social performance of investees affects portfolio management.	
IFD 28.4	Additional information [OPTIONAL]	

IFD 28	EXPLANATORY NOTES
LOGIC	
IFD 28	This indicator will be applicable if you report using any tools for social performance reporting (in house and/or externally developed) in [18.1]. Within this indicator: [28.2] will be applicable if you report 'Yes' to investment decision-making in [28.1]; and [28.3] will be applicable if you report 'Yes' to portfolio management in [28.1].
ASSESSMENT	
IFD 28	Maximum score: Three ★ The assessment of this indicator is based on your responses to [28.2 & 28.3].

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	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	Both 'No'	⭘	
	Either 'Yes'	★★	
	Both 'Yes'	★★★	

Possible action

Strive for a balanced long-term social and financial risk-adjusted return that recognises the interests of clients, retail providers and investors.

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IFD 29	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PIIF 6

IFD 29	INDICATOR	
IFD 29.1	Indicate whether your staff have monetary incentives or performance objectives related to responsible investment in inclusive finance.	
	❍ Yes	❍ No
IFD 29.2	Additional information	

IFD 29	EXPLANATORY NOTES		
LOGIC			
IFD 29	This indicator will be applicable if you report using any tools for social performance reporting (in house and/or externally developed) in [18.1].		
ASSESSMENT			
IFD 29	Maximum score: Three ★ The assessment of this indicator is based on your responses to [29.1].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	'No'	⭘	
	'Yes'	★★★	

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PRI Principles for Responsible Investment

Possible action

Strive for a balanced long-term social and financial risk-adjusted return that recognises the interests of clients, retail providers and investors.

IFD 30	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PIIF 6

IFD 30	INDICATOR	
IFD 30.1	Indicate whether you collect data regarding the social outcomes of your investees' work.	
	❍ Yes	❍ No
IFD 30.2	Additional information [OPTIONAL]	

IFD 30	**EXPLANATORY NOTES**		
IFD 30.1	Outcomes refer to the intended result, effect or consequence that will occur from investees' programmes or activities, as distinct from the programmes or activities themselves and their outputs, for example, the collection of client income surveys for outcome studies, or the use of the Progress out of Poverty index (PPI) to monitor poverty alleviation. Data collection and analysis could be direct or via a third party.		
IFD 30.2	For example, elaborate on the type of social outcomes data you collect.		
LOGIC			
IFD 30	This indicator will be applicable if you report using any tools for social performance reporting (in-house and/or externally developed) in [18.1].		
ASSESSMENT			
IFD 30	Maximum score: Three ★ The assessment of this indicator is based on your responses to [30.1].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	'No'	⭘	
	'Yes'	★★★	

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Possible action

Strive for a balanced long-term social and financial risk-adjusted return that recognises the interests of clients, retail providers and investors.

IFD 31	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PIIF 6

IFD 31	INDICATOR	
IFD 31.1	Indicate whether you incentivise investees to track social performance.	
	❍ Yes	❍ No
IFD 31.2	Explain how you incentivise investees to track social performance.	
IFD 31.3	Additional information [OPTIONAL]	

IFD 31	**EXPLANATORY NOTES**		
IFD 31.2	For example, for fixed income investors, is there a discount on the interest rate available when environmental, social or governance performance is positive?		
LOGIC			
IFD 31	This indicator will be applicable if you report using any tools for social performance reporting (in-house and/or externally developed) in [18.1]. [31.2] will be applicable if 'Yes' is reported in [31.1].		
ASSESSMENT			
IFD 31	Maximum score: Three ★ The assessment of this indicator is based on your responses to [31.1].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	'No'	⭘	
	'Yes'	★★★	

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SECTION

PIIF Principle 7: Standards

Possible action

Participate in networks to share tools, information and resources.

IFD 32	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PIIF 7

IFD 32	INDICATOR
IFD 32.1	Select which of the following collaborative initiatives your organisation has supported or participated in and the role you played.
	The Principles for Investors in Inclusive Finance
	❍ Yes ❍ Basic ❍ Moderate ❍ Advanced ❍ No
	The Smart Campaign
	❍ Yes ❍ Basic ❍ Moderate ❍ Advanced ❍ No
	Social Performance Task Force
	❍ Yes ❍ Basic ❍ Moderate ❍ Advanced ❍ No
	Financial Inclusion Equity Council (formerly CMEF)
	❍ Yes ❍ Basic ❍ Moderate ❍ Advanced ❍ No

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	European Microfinance Platform (eMFP)
	❍ Yes ❍ Basic ❍ Moderate ❍ Advanced ❍ No
	Global Impact Investors Network (GIIN)
	❍ Yes ❍ Basic ❍ Moderate ❍ Advanced ❍ No
	Other network, association memberships and/or specific collaboration related to the promotion of inclusive finance; specify_____
	❍ Yes ❍ Basic ❍ Moderate ❍ Advanced ❍ No
IFD 32.2	If you have indicated that your organisation was involved in any of the above, please provide a brief commentary. [OPTIONAL]
IFD 32.3	Additional information [OPTIONAL]

IFD 32	**EXPLANATORY NOTES**		
ASSESSMENT			
IFD 32	Maximum score: Three ★ The assessment of this indicator is based on your responses to [32.1]. This indicator assesses signatories' involvement in collaborative initiatives. A higher level of involvement will receive higher credit than being involved in many organisations/initiatives.		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	All 'No'	⭘	
	'Basic' role in any initiative	★	
	'Moderate' role in any initiative	★★	

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	‘Advanced’ role in any initiative	★★★	

IFD 32	DEFINITIONS
Basic role	Select this category if at least one of these activities applies to your organisation: • joined or signed up to an initiative; • attended conferences as a participant; and/or • attended one or two meetings arranged by the initiative to be informed of its progress.
Moderate role	Select this category if at least one of these activities applies to your organisation: • acted ad hoc as a public spokesperson for the initiative; • participated to some degree in advancing the initiative by preparing position papers and joint statements; and/or • contributed to the organisation or content of events organised by the initiative.
Advanced role	Select this category if at least one of these activities applies to your organisation: • played a leading role in the initiative by preparing position papers and joint statements; • regularly acted as a public spokesperson for the initiative and actively promoted it; and/or • provided significant operational, content development and/or financial support to the initiative beyond basic membership requirements.

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Possible action

Participate in networks to share tools, information and resources.

IFD 33	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PIIF 7

IFD 33	INDICATOR	
IFD 33.1	Indicate whether you encourage your investees to be a member of/endorse the following.	
	Social Performance Task Force	
	❍ Yes	❍ No
	Describe how you have supported them in implementation (direct or via a third party) during the reporting year.	
	Indicate what percentage of investees, as a percentage of your direct inclusive finance portfolio, is a member of/has endorsed this.	
	❍ <20, ❍ 20-40, ❍ 41-60, ❍ 61-80, ❍ >80% ❑ We do not track this information.	
	The Smart Campaign	
	❍ Yes	❍ No
	Describe how you have supported them in implementation (direct or via a third party) during the reporting year.	
	Indicate what percentage of investees, as a percentage of your direct inclusive finance portfolio, is a member of/has endorsed this.	
	❍ <20, ❍ 20-40, ❍ 41-60, ❍ 61-80, ❍ >80% ❑ We do not track this information.	
	Other network and association memberships and/or specific collaboration related to the promotion of inclusive finance; specify _____	
	❍ Yes	❍ No
	Describe how you have supported them in implementation (direct or via a third party) during the reporting year.	
	Indicate what percentage of investees, as a percentage of your direct inclusive finance portfolio, is a member of/has endorsed this.	
	❍ <20, ❍ 20-40, ❍ 41-60, ❍ 61-80, ❍ >80% ❑ We do not track this information.	
IFD 33.2	Additional information [OPTIONAL]	

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IFD 33	EXPLANATORY NOTES
IFD 33	For a map of responsible investment initiatives in microfinance, see http://www.unpri.org/wp-content/uploads/RIinitiativesinmicrofinance.pdf. An accompanying description can be found at http://www.unpri.org/wp-content/uploads/2012-11Reponsibleinvestmentinitiativesaccompanyingbriefing.pdf.

ASSESSMENT			
IFD 33	Maximum score: Three ★ The assessment of this indicator is based on your responses to [33.1].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	'No'	⭘	
	'Yes', for any of the above	★★★	

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Possible action

Contribute to advancing benchmarking as an incentive for improvement.

IFD 34	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PIIF 7

IFD 34	INDICATOR	
IFD 34.1	Indicate whether you encourage your investees to participate in initiatives that contribute to the development of industry benchmarks.	
	MIX Market	
	❍ Yes	❍ No
	Describe which actions you have taken and confirm whether you encourage reporting against the MIX Social Performance Indicators.	
	MFTransparency	
	❍ Yes	❍ No
	Describe which actions you have taken.	
	Universal Standards for Social Performance Measurement	
	❍ Yes	❍ No
	Describe which actions you have taken.	
	Other; specify_____	
	❍ Yes	❍ No
	Describe which actions you have taken.	
IFD 34.2	Additional information [OPTIONAL]	

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IFD 34	EXPLANATORY NOTES
IFD 34	The MIX's primary objective is to increase transparency in the microfinance industry through data collection and analysis. To meet this objective, MIX presents a range of data on MFIs, from financial and operational data to data on social performance, products and funding structure. MFIs voluntarily provide data to the MIX and can submit this using the MIX's downloadable data form (available in multiple languages) and sending any reports that may already contain the information required (i.e., ratings, annual reports, donor/investor reports and audits). MFIs can also submit core social performance indicator data. MFTransparency encourages the microfinance industry to be open and transparent regarding the true price of loan products and to provide the information clearly and consistently. It collects and publishes data on loan pricing to help investors and other industry stakeholders make comparisons. Through the Global Transparency Pricing Initiative, microfinance service providers of all types, including NGOs, banks and cooperatives, can participate by submitting their microloan pricing data. It works on a country-by-country basis and does not publish data for any country until it has a large majority of that market represented. As of 2012, MFTransparency had data on the following countries: Azerbaijan, Bolivia, Bosnia and Herzegovina, Cambodia, Colombia, Ecuador, Ethiopia, Ghana, India, Kenya, Malawi, Mozambique, Philippines, Rwanda, Tanzania, Uganda and Zambia. For MFIs in countries not yet covered, MFTransparency can provide an official Pricing Certification following in-depth analysis. Developed through broad industry consultation and launched in 2012, the SPTF Universal Standards for Social Performance Management are a set of management standards that apply to all microfinance institutions pursing a double bottom line. Meeting the standards signifies that an institution has "strong" social performance management (SPM) practices. To achieve this, institutions must: 1. define and monitor social goals; 2. ensure board, management and employee commitment to social goals; 3. treat clients responsibly; 4. design products, services, delivery models and channels that meet clients'' needs and preferences; 5. treat employees responsibly; and 6. balance financial and social performance The standards are voluntary and aspirational, but MFIs (particularly SPTF members) are encouraged to use them to guide their strategies for achieving stronger social performance management and to self-regulate their social performance.

ASSESSMENT

IFD 34	Maximum score: Three ★ The assessment of this indicator is based on your responses to [34.1].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	'No'	○	
	'Yes', any of the above	★★★	

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PRI Principles for Responsible Investment

PRI REPORTING FRAMEWORK 2019
Indirect — Inclusive Finance

November 2018

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UNEP Finance Initiative
Changing finance, financing change

United Nations Global Compact

An investor initiative in partnership with UNEP Finance Initiative and UN Global Compact

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 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), the purpose of the indicator and which PRI Principle it relates to.

	Indicator status	Purpose	Principle
xxx 01	*MANDATORY*	*CORE ASSESSED*	*PRI 2*

Indicator status

MANDATORY	Mandatory indicators reflect core practices. These responses will be made public and must be completed to submit the framework.
MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	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.
VOLUNTARY	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.
Peering	These indicators are used to determine your peer groups for assessment purposes.
Core assessed	These indicators form the core of the assessment and represent the majority of your final assessment score.
Additional assessed	These indicators represent more advanced or alternative practices and contribute to a smaller part of your score.
Descriptive	These are open-ended narrative indicators, allowing you to describe your activities.

Underneath the indicator

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

xxx 01	EXPLANATORY NOTES
xxx 01.1	This provides guidance on how to interpret the sub-indicators, including examples of what could be reported.
xxx 01.2	
LOGIC	
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.
ASSESSMENT	
xxx 01	This provides a brief overview of the pilot assessment approach for this indicator.

xxx 01	DEFINITIONS
xxx 01	Specific terms that are used in the indicator are defined here.

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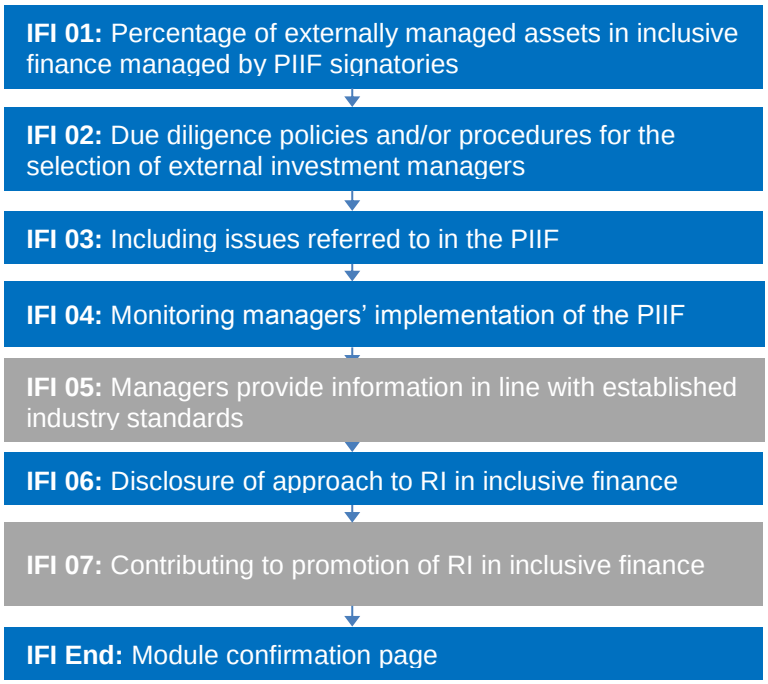
Pathways through the module



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Preface

This module relates to indirect investments in inclusive finance (i.e., in which the investments are managed on your behalf by a third party).

Unless otherwise stated, 'assets' refer exclusively to the percentage of your assets directly invested in inclusive finance. If you invest both directly and indirectly in inclusive finance, please report against the following indicators on the basis of your indirect investments only.

The indicators in this module follow from indicators in the *Indirect—Selection, Appointment and Monitoring of external managers (SAM)* module for indirect investors. Therefore, if you have no specific or distinct policy with regards to your investments in inclusive finance, please indicate this in response to the following indicators whenever applicable to avoid having to repeat your responses.

Summary of updates

There have been no changes to the wording or structure of indicators in this module since 2017.

Prefilling can be enabled for all indicators in this module.

To view a detailed summary of the changes to the module, please click here.

For any word limit in the module, please click here.

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SECTION

Context

IFI 01	Indicator status MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	Purpose DESCRIPTIVE	Principle GENERAL

IFI 01	INDICATOR	
IFI 01.1	Indicate approximately what percentage (+/-10%) of your externally managed assets in inclusive finance is managed by PIIF signatories.	
	❍ All	
	❍ Some	% of your total externally managed assets in inclusive finance
IFI 01.2	Additional information [OPTIONAL]	

IFI 01	EXPLANATORY NOTES
IFI 01.1	These figures are used to reduce the scope for double counting of signatories' AUM for the purposes of PRI public communication. There is no value judgement placed on this percentage, and it will not be used as part of the scoring/assessment methodology.

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SECTION

Selection

IFI 02	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle GENERAL

IFI 02	INDICATOR	
IFI 02.1	Indicate whether you have due diligence policies and/or procedures in place for the selection of external investment managers in inclusive finance that take their approach to the following responsible investment issues (PIIF Principles) into account.	
	Actively supporting retail providers to innovate and expand the range of financial services available to low income people (Principle 1)	❍ Yes ❍ No
	Integration of client protection in investment policies and practices (Principle 2)	❍ Yes ❍ No
	Treating investees fairly with appropriate financing that meets demand, clear and balanced contracts and fair processes for resolving disputes (Principle 3)	❍ Yes ❍ No
	The inclusion of environmental, social and corporate governance (ESG) issues in investment policies and reporting (Principle 4)	❍ Yes ❍ No
	Active promotion of transparency in all aspects (Principle 5)	❍ Yes ❍ No
	Striving for a balanced long-term social and financial risk-adjusted return that recognises the interests of clients, retail providers and investors (Principle 6)	❍ Yes ❍ No
	Collaborating to set harmonised investor standards that support the further development of inclusive finance (Principle 7)	❍ Yes ❍ No
IFI 02.2	Additional information [OPTIONAL]	

IFI 02	EXPLANATORY NOTES
IFI 02	It is recognised that no due diligence may have been undertaken since the PIIF came into existence and/or your organisation's signature to the PIIF. In this instance, this indicator refers to whether you have processes or procedures in place to incorporate any of the above issues into future due diligence.
ASSESSMENT	
IFI 02	Maximum score: Three ★ The assessment of this indicator is based on your responses to [02.1].

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	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	All ‘no’ responses	⭘	
	One/two ‘yes’ responses	★	
	Three/four ‘yes’ responses	★★	
	More than four ‘yes’ responses	★★★	

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SECTION

Contractual agreements and mandate design

IFI 03	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle GENERAL

IFI 03	INDICATOR		
IFI 03.1	When agreeing to contracts and designing mandates with investment managers, in the process, indicate whether you consider including the following issues referred to in the PIIF.		
	Actively supporting retail providers to innovate and expand the range of financial services to low-income people (Principle 1)	❍ Yes	❍ No
		Describe and indicate how.	
	Integration of client protection in investment policies and practices (Principle 2)	❍ Yes	❍ No
		Describe and indicate how.	
	Treating investees fairly with appropriate financing needs that meets demand, clear and balanced contracts and fair processes for resolving disputes (Principle 3)	❍ Yes	❍ No
		Describe and indicate how.	
	The inclusion of ESG issues in investment policies and reporting (Principle 4)	❍ Yes	❍ No
		Describe and indicate how.	
	Active promotion of transparency in all aspects (Principle 5)	❍ Yes	❍ No
		Describe and indicate how.	
	Striving for a balanced long-term social and financial risk-adjusted return that recognises the interests of clients, retail providers and investors (Principle 6)	❍ Yes	❍ No
		Describe and indicate how.	
	Collaborating to set harmonised investor standards that support the further development of inclusive finance (Principle 7)	❍ Yes	❍ No
		Describe and indicate how.	
IFI 03.2	Additional information [OPTIONAL]		

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IFI 03	EXPLANATORY NOTES
IFI 03	It is recognised that existing contracts and mandates may predate the existence of the PIIF and/or your organisation's signature to the PIIF. In this instance, this indicator refers to whether you have processes or procedures in place to incorporate any of the above issues into future contracts and mandates. One way for indirect investor signatories to take the PIIF principles into account is to ensure that investment managers are signatories to the PIIF. There are many other ways to demonstrate commitment to individual principles when selecting investment managers. Below are further examples of possible actions investment managers can take that are aligned with the principles. See the Inclusive Finance Direct (IFD) module of the Reporting Framework for examples of policies and procedures that direct investors may incorporate in relation to the seven principles. You could also refer to any third-party verification of these elements, when appropriate. This could take the form of references, external audits or ratings. **PIIF Principle 1**: Expand range of financial services to low-income people. Possible actions: Encourage retail providers to develop innovative products tailored to the needs of low-income clients and to expand their service offerings to more remote areas and more vulnerable populations. **PIIF Principle 2**: Client protection in investment policies and practices. Possible actions: • incorporate the Client Protection Principles into investment policies, due diligence processes and financing or shareholder agreements when possible; • check progress on implementation of the Client Protection Principles through mandatory reporting and regular monitoring and evaluation; and/or • report on progress made in advancing the Client Protection Principles to investors and other stakeholders. **PIIF Principle 3**: Treating investees fairly. Possible actions: • provide financing in an appropriate currency and with an adequate tenor; and/or • focus on ultimate clients' interests when dealing with defaults, forced exit or restructuring situations. **PIIF Principle 4**: Inclusion of ESG issues in investment policies and reporting. Possible actions: • use the Social Performance Task Force standards and tools, such as the Universal Standards for Social Performance Management, to measure and report on social performance; • assist in developing appropriate references for environmental and corporate governance issues; and/or • promote implementation of anti-corruption practices. **PIIF Principle 5:** Active promotion of transparency. Possible actions: • ensure that investees adequately disclose the pricing, terms and conditions of financial products and services offered, and that the pricing, terms and conditions are understood by clients; • fully disclose investment objectives, both financial and social, to investors; and/or • endorse MF Transparency, a global initiative for fair and transparent pricing in the microfinance industry. **PIIF Principle 6**: Balanced long-term social and financial risk-adjusted return. Possible actions:

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	• exercise voting rights when available; and/or • when investing in equity, engage with investees to achieve a reasonable and fair alignment between the social impact and the financial return requirements of shareholders; i.e., focusing on the long-term. **PIIF Principle 7**: Support the further development of inclusive finance. Possible actions: • Participate in networks to share tools, information and resources; and/or • develop and support appropriate collaborative initiatives.
ASSESSMENT	
IFI 03	Maximum score: Three ★ The assessment of this indicator is based on your responses to [03.1].

Indicator scoring methodology		
Selected response	**Level score**	**Further Details**
All 'no' responses	○	
One/two 'yes' responses	★	
Three/four 'yes' responses	★★	
More than four 'yes' responses	★★★	

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PRI Principles for Responsible Investment

SECTION

Investment manager monitoring and reporting

IFI 04	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle GENERAL

IFI 04	INDICATOR	
IFI 04.1	Indicate whether you monitor your current investment managers' implementation of the PIIF principles.	
	❍ Yes	❍ No
IFI 04.2	Indicate the frequency of reporting you typically require. ❍ Annually or more frequently ❍ Every two years or less ❍ Ad hoc, specify_____	
IFI 04.3	Additional information [OPTIONAL]	

IFI 04	EXPLANATORY NOTES		
IFI 04.3	If applicable, provide examples of the areas prioritised in monitoring investment managers' implementation.		
LOGIC			
IFI 04	[04.2] will be applicable if 'Yes' is reported in [04.1].		
ASSESSMENT			
IFI 04	Maximum score: Three ★ The assessment of this indicator is based on your responses to [04.1 & 04.2].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	Do not monitor managers implementation of the PIIF principles	⭘	
	Monitor managers implementation of the PIIF principles every two years or less or ad-hoc	★★	
	Monitor managers implementation of the PIIF principles annually or more frequently	★★★	

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SECTION

Disclosure

IFI 05	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle GENERAL

IFI 05	INDICATOR	
IFI 05.1	Indicate whether you require your investment managers to provide you with information in line with established industry standards.	
	❍ Yes	❑ The MIV Disclosure Guidelines ❑ The Impact Reporting & Investment Standards (IRIS) ❑ Principles for Investors in Inclusive Finance (PIIF) ❑ Other; specify_____
	❍ No	
IFI 05.2	Describe the indicators prioritised and the percentage of your assets this applies to.	
IFI 05.3	Additional information [OPTIONAL]	

IFI 05	EXPLANATORY NOTES
IFI 05.1	The MIV Disclosure Guidelines provide a set of standardised indicators against which microfinance investment institutions/vehicles (see Appendix 2 for definitions and guidance) can disclose. Disclosure includes information on MIVs' profiles, including legal information, investment strategy, selected indicators to assess financial performance and ESG policies. For the full set of MIV Disclosure Guidelines, see http://www.cgap.org/research/publication/microfinance-investment-vehicles-disclosure-guidelines Impact Reporting & Investment Standards (IRIS) is a common language for describing the social and environmental performance of an organisation. IRIS provides an independent and credible set of metrics for organisations to use when reporting their impact. IRIS indicators span an array of performance objectives and include specialised metrics for a range of sectors including financial services: http://iris.thegiin.org/.
LOGIC	
IFI 05	Within indicator [05.2] will be applicable if 'Yes' is reported in [05.1].
ASSESSMENT	
IFI 05	Maximum score: Three ★ The assessment of this indicator is based on your responses to [05.1].
	Indicator scoring methodology

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	Selected response	Level score	Further Details
	'No'	⭘	
	'Yes'	★★★	

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IFI 06	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle GENERAL

IFI 06	INDICATOR
IFI 06.1	Indicate whether your organisation proactively discloses any information about your approach to responsible investment in inclusive finance. ❍ Yes, we disclose publicly; provide URL:_____ ❍ Yes, we disclose to clients/beneficiaries only. ❍ No
IFI 06.2	Additional information [OPTIONAL]

IFI 06	EXPLANATORY NOTES
IFI 06	The purpose of this indicator is to allow signatories to demonstrate how widely they make information about their inclusive finance activities available. Information provided to certain groups such as pension fund beneficiaries may in practice be in the public domain. However, deliberate reporting to the public at large is treated here as a separate category of communication. 'Proactively' means beyond the publication of your responses to the PRI Reporting Framework on the PRI website. This can be information on your own website (such as your PRI Reporting Framework responses), annual report, newsletter, etc., which may include the information from the PRI Reporting Framework, in full, a selection or as a link. It may also be information proactively given to clients using any form judged most appropriate.
ASSESSMENT	
IFI 06	Maximum score: Three ★ The assessment of this indicator is based on your responses to [06.1].

Indicator scoring methodology

Selected response	Level score	Further Details
'No'	⭘	
'Yes, we disclose to clients only'	★★	
'Yes, we disclose to the public'	★★★	

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IFI 07	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle GENERAL

IFI 07	INDICATOR	
IFI 07.1	Indicate whether you contributed to the promotion of responsible investment in inclusive finance in the reporting year, beyond investment manager selection, appointment, monitoring and reporting.	
	❍ Yes	❍ No
IFI 07.2	Describe what actions you have taken and whether these are delivered via a separate entity.	
IFI 07.3	Additional information [OPTIONAL]	

IFI 07	EXPLANATORY NOTES
IFI 07.1	Promotion of responsible investment can include support for non-investment activities such as grants, patient capital or non-financial resources to support technical assistance programmes or exploration of financial services other than credit. It could also include promotion of/additional engagement in initiatives such as the PIIF, the Client Protection Principles/the Smart Campaign; MFTransparency; the Social Performance Task Force; or your own specific responsible investment in inclusive finance initiative. Promotion beyond investment manager appointment, monitoring and reporting could include participation in conferences, panels, seminars or industry groups regarding raising awareness about responsible investment in inclusive finance.
IFI 07.2	For example, a foundation or other distinct but connected entity.
LOGIC	
IFI 07	[07.2] will be applicable if 'Yes' is reported in [07.1].

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PRI REPORTING FRAMEWORK 2019

Direct — Hedge Funds

November 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 identify which indicators are relevant to your organisation.

Top bar

Key information about each indicator is highlighted in the top bar, including the indicator status (mandatory or voluntary), the purpose of the indicator and the PRI Principle to which it relates.

	Indicator status	Purpose	Principle
xxx 01	*MANDATORY*	*CORE ASSESSED*	*PRI 2*

Indicator status

MANDATORY	Mandatory indicators reflect core practices. These responses will be made public and must be completed to submit the framework.
MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	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.
VOLUNTARY	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 to your organisation. Please refer to the logic box for more information.
Peering	These indicators are used to determine your peer groups for assessment purposes.
Core assessed	These indicators form the core of the assessment and represent the majority of your final assessment score.
Additional assessed	These indicators represent more advanced or alternative practices and contribute to a smaller part of your score.
Descriptive	These are open-ended narrative indicators, allowing you to describe your activities.

Underneath the indicator

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

xxx 01	EXPLANATORY NOTES
xxx 01.1	This provides guidance on how to interpret the sub-indicators, including examples of what can be reported.
xxx 01.2	
LOGIC	
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	DEFINITIONS
xxx 01	Specific terms that are used in the indicator are defined here.

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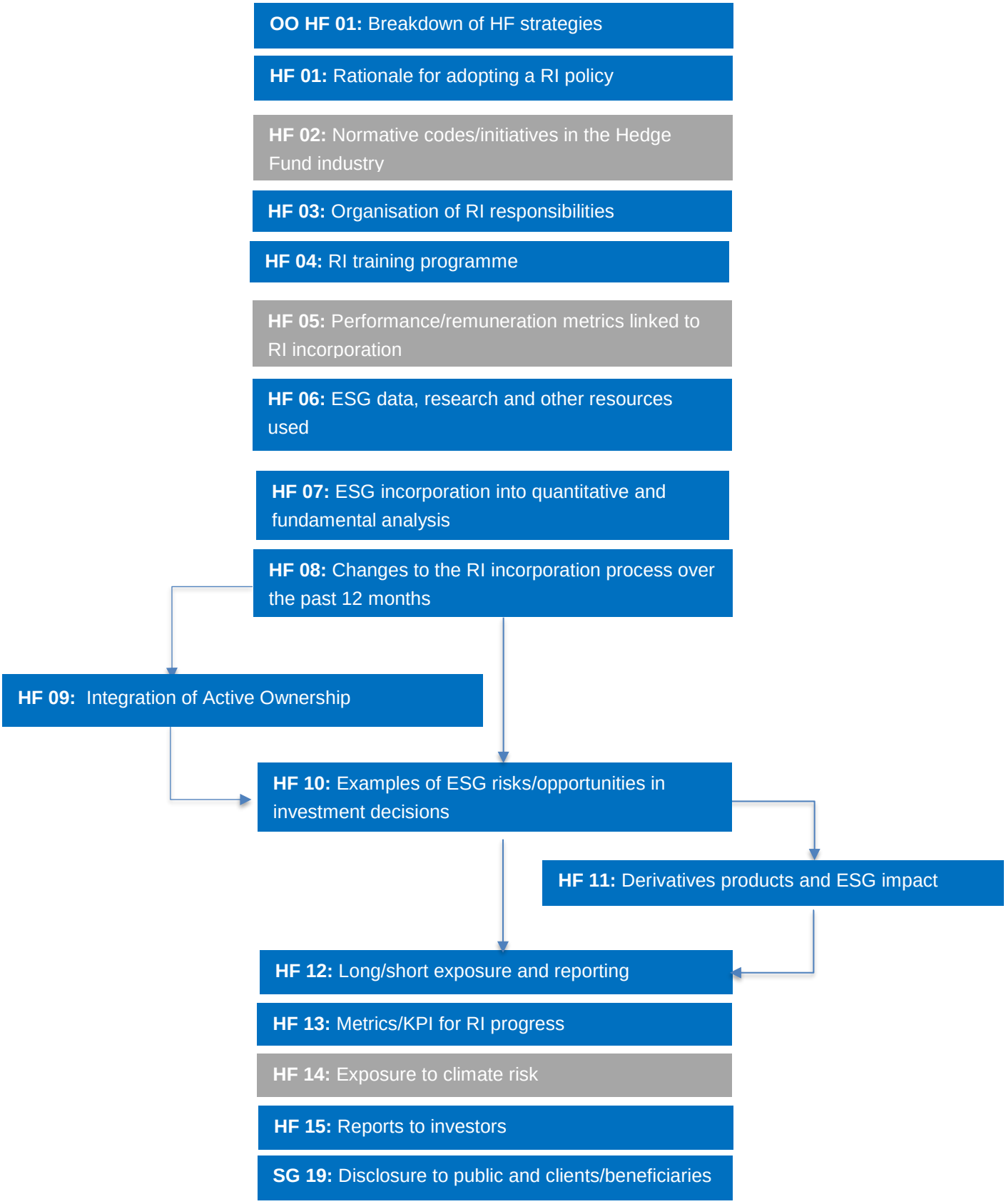
Pathways through the module



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Preface

The information reported in this module will enable your stakeholders to understand your organisation's overall approach to responsible investment (e.g., governance, responsible investment policy, objectives and targets, resources allocated to responsible investment, and your approach to collaborations on responsible investment and public policy-related issues), and the incorporation of ESG issues into asset allocation.

It is mandatory for all PRI signatories to complete this module if more than 10% of their assets under management (AUM) are directly invested in hedge funds. This does not include cash and only concerns investments made directly by your organisation without engaging an external investment manager.

If your hedge fund investments are constrained in any way that limits your ability to apply a RI approach, you should explain this in the relevant free text indicators.

Further details are available in the PRI – HF Responsible Investment Guide that will be available in January 2019.

Contact the PRI if you require further clarification.

Background

The Hedge Funds module has been developed to provide a comprehensive and forward-looking set of indicators. In places, the indicators concern fairly advanced practices, including practices which the PRI expects will become more common as signatories make progress as responsible investors in this investment strategy.

To view a detailed summary of the changes to the module, please click here.

For any word limit in the module, please click here.

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SECTION

Policy

HF 01	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle GENERAL

HF 01	INDICATOR
HF 01.1	What is your rationale for adopting a policy to incorporate RI into the investment decision-making process? Please select all options that apply to your organisation. ❑ To provide a framework and ESG applicability to security selections (the strategy) and decision making in Hedge Funds (e.g., breaking the strategy into different components and focusing on risk/return) ❑ To provide a framework for the fund governance structure ❑ Because ESG incorporation is perceived as a competitive advantage in the industry ❑ Growing momentum of sustainable investing in Hedge Funds in the financial community ❑ Other (specify) ❍ None of the above (**we don't have a policy addressing RI incorporation into Hedge Funds**)
HF 01.2	Additional information [OPTIONAL]

HF 01	EXPLANATORY NOTES
HF 01	This indicator is applicable to all signatories. Adopting a responsible investment policy is covered at a high-level in the module Strategy and Governance within indicator SG 01. This indicator HF 01 refers specifically to your hedge fund investments and the main reasons your organisation considers when addressing RI in hedge funds. For example, a responsible investment policy addressing hedge funds investments may include the following: 1. A statement of the hedge fund managers to **behave with the highest legal, ethical and professional standards**. 2. The managers will act as a **responsible owner** when holdings are made in an investee company. 3. The managers will **not borrow shares with the purpose of voting** those shares 4. The governance structure will be used to provide **appropriate levels of oversight** in the following activities: valuation, audit, risk management and conflict of interests. 5. **Compliance will be supported** at investee companies compliant with applicable local laws in the country invested. 6. We will **track the potential impacts** of our activities on the markets and we will act consequently for the best interests of the community. For further guidance on how to design and implement a responsible investment policy, please refers to the Strategy and Governance module SG 01 guidance.

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PRI Principles for Responsible Investment

HF 01	DEFINITIONS
Responsible Investment policy	A responsible investment policy refers to an overall statement that actualises the approach on how your organisation will achieve its identified mission in incorporating RI or ESG issues, and will build on your investment strategy, outline your investment objectives, and give guidance to investment processes as well as your standards for measuring success/performance.
Fund governance	The fund governance relates to the work conducted by the governing body of an investment fund to ensure that the best interests of the fund and its investors are respected and in line with the regulation applicable in the jurisdiction where the fund is operated. When the fund is operated offshore, a company is generally set up and the governing body is the board of directors. This board of director will have full oversight and responsibility of the management of the fund.
Hedge fund strategy	A hedge fund strategy follows a specific risk/return objective and can be classified in distinct categories. Throughout this module, we will refer to the HFR classification to emphasize a specific strategy. A given strategy includes generally the following elements: - Market conditions: level of interest rates, volatility, etc. - One or several different financial instruments: equity, fixed income, derivatives, etc. - A sector: healthcare, utilities, etc. - One method or more of asset selection: quantitative, fundamental approach, etc. - Diversification approach: risk management, sector or regional diversification, etc.

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HF 02	Indicator status VOLUNTARY	Purpose DESCRPTIVE	Principle 4,5

HF 02	INDICATOR
HF 02.1	To which normative codes and initiatives are you a signatory or voluntary adherent? ❑ AOI Hedge Funds Principles 2014 ❑ Standard Board for Alternative Investments (SBAI) ❑ Alternative Investment Management Association (AIMA) ❑ International Organisation of Securities Commissions (IOSCO) ❑ CFA's Asset Manager Code of Professional Conduct ❑ Other, specify_____ ❍ None of the above
HF 02.2	Additional information

HF 02	EXPLANATORY NOTES
HF 02.1	This question is also covered on the SG module (SG 07) at a high level. For clarity purpose and in order to differentiate hedge funds investments from other categories of investments, HF 02.1 mainly lists on a non-exhaustive basis normative codes and initiatives that mainly pertain to the hedge funds industry but not exclusively.

HF 02	DEFINITIONS
AOI	Alignment Of Interests Association (AOI): a non-profit, investor-driven organisation focused on strengthening the alignment between hedge fund industry participants. Its mission is to foster investor collaboration, provide an independent forum for the exchange of ideas and contribute to the sharing of educational resources among investors.
Standards Board for Alternative Investments (SBAI)	Formerly known as the Hedge Fund Standards Board (HFSB), the SBAI is an international standard-setting body for the alternative investment industry, acting as a custodian of the Alternative Investment Standards designed to provide a framework of transparency, integrity and good governance for the hedge fund industry.
Alternative Investment Management Association (AIMA)	A professional association standing for the alternative investment industry with more than 1,900 corporate members in 60 countries. The AIIMA showcases leadership in industry initiatives such as advocacy, policy and regulatory management, educational programmes and sound practice guides. The association is also a co-founder of the Chartered Alternative Investment Analyst designation (CAIA).
International Organisation of Securities Commissions (IOSCO)	An association of organisations that is in charge of regulating almost 95% of the securities and futures markets in the world. Members include securities/futures market regulators such as a stock exchange or the Commodity Future Trading Commission (CFTC).
CFA's Asset Manager Code of Professional Conduct	As stated by the CFA Institute, "by adopting the Code, asset management firms signal their commitment to commonly held ethical principles and allow plan sponsors and other investors to easily identify which asset managers uphold the principles that resolve conflicts of interest in favour of investors." For further guidance and information on other initiatives/codes, please refer to the SG module.

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PRI Principles for Responsible Investment

SECTION

Governance

HF 03	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle GENERAL

HF 03	INDICATOR
HF 03.1	Indicate whether and how your organisation has organised RI implementation and/or oversight responsibilities. ❑ We have dedicated internal staff with RI oversight responsibility for Hedge Funds. Please specify (CEO, CIO, PM, etc.) ❑ We have dedicated internal staff with RI implementation responsibility for Hedge Funds. Please specify (CEO, CIO, PM, etc.) ❑ We use external consultants who have oversight and/or RI implementation responsibilities ❑ Other, specify_____ ❍ We do not have staff dedicated to RI oversight and implementation
HF 03.2	Additional information [OPTIONAL]

HF 03	DEFINITIONS
Oversight responsibility	We refer specifically to roles for which the management or governance responsibility is in place so that the organisation effectively implements its policies and reaches its objectives and targets in relation to responsible investment performance. The role holders are accountable for embedding ESG consideration in investment processes.
Implementation responsibility	This responsibility covers individuals in charge of implementing specific aspects of the organisation's responsible investment practices. The implementation responsibility applies not only to dedicated staff but also to any other roles in the organisation
External consultants	Here we refer to individuals/organisations who have been legally mandated to take any of the two categories of responsibilities above. These external consultants can be used as a substitute to or in conjunction with internal staff. For further guidance, please refer organisational-level notes in SG module (SG 07)

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PRI Principles for Responsible Investment

HF 04	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle GENERAL

HF 04	INDICATOR
HF 04.1	Please indicate whether you implemented any RI training programmes regarding hedge fund investments for your staff during the reporting year. ❑ Yes, we have a formal RI training/educational programme covering hedge funds ❑ Yes, we have a RI training programme to educate staff regarding our hedge fund policies ❑ Yes, we regularly train our staff on code of ethics/compliance manuals covering hedge fund investments ❑ Other, specify_____ ❍ No, we don't have a RI training programme
HF 04.2	If yes, please explain how the RI training programme is conducted?

HF 04	DEFINITIONS
Responsible Investment training program	Educating the organisation staff about Responsible Investment on a regular basis should be perceived as a key target in order to stay abreast with the development in the industry. The format of the training can be either formal or informal. Formal training stands for attendance to courses offered by universities or relevant certifications. Informal training relates to attendance at conferences or mentoring schemes.
Hedge Funds policies	A Hedge Fund policy is generally a written document outlining the purpose of the fund, the division of responsibilities (the composition of the Board, Investment Committee), the strategies followed, the asset allocation, the return objectives, the limitations in place and any other information relevant to the trustees such as potential conflict of interests or restrictions on any particular investments. A Hedge Fund policy is different from a Responsible Investment (RI) policy, the latter specifying how ESG considerations are incorporated in investment decisions. For further information about a RI policy, what it entails and how it should be designed, please refer to the module SG (indicator SG 01) and the PRI website here.
Code of Ethics/Compliance manuals	A bespoke guide of principles designed to help professionals to conduct business honestly and with integrity. It generally includes behavioural rules applicable to the organisation along with sanctions and penalties in case of violations. Because the financial industry involves increasingly tougher regulation, several leading organisations such as the CFA institute or the FCA in the UK developed their own code of ethics widely accepted and recognised as paragons in the industry.

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HF 05	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle 1

HF 05	INDICATOR
HF 05.1	In incorporating RI into Hedge Funds, what are the main consideration(s) influencing your organisation? Please select the options that apply to your organisation. ❑ To achieve a robust governance structure for our Hedge Fund investments ❑ To attain relevant/existing ESG data ❑ To clearly identify/manage the ESG opportunities associated with each strategy ❑ To clearly identify each strategy and the associated financial risks ❑ Other, specify ❍ None of the above
HF 05.2	Do the annual employee(s) performance reviews or remuneration metrics reflect any component of the KPI used for the incorporation of RI into Hedge Funds? ❍ Yes ❍ No If yes, please select and describe the KPIs that are used in your organisation (at least one KPI should be linked to variable pay).
HF 05.3	If you responded "No" in HF 05.2, please explain the reasons.

KPI	Variable pay linked	Explanation
❑ Risk management	❍ Yes ❍ No	
❑ Financial performance	❍ Yes ❍ No	
❑ Other (specify)	❍ Yes ❍ No	

HF 05	EXPLANATORY NOTES
HF 05	**RI considerations** This indicator asks specifically about the most essential reasons your organisation follows to implement responsible investment into hedge funds, set up KPIs and link these KPI to any variable pay. Example of such reasons could be: **Establishing a strong governance structure**: identifying key managers, roles, etc. **Identify strategies and manage ESG opportunities:** each strategy is different in terms of risks/returns and ESG opportunities. Being able to identify the strategies followed could provide a clearer direction towards specific ESG opportunities. **Attain relevant data:** using existing ESG data could be perceived as a strong incentive to integrate RI into Hedge Funds and to foster competition on the market.

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PRI Principles for Responsible Investment

	KPI and variable pay The sub-indicator HF 05.2 is designed to assess whether your organisation incentivises the staff in charge to reach specific responsible investment KPI through a variable pay scheme (bonus, share-option schemes, etc.). **Risk management** Risk management is the process resulting from an investment decision and follows different steps: identification of the risks, analysis, and acceptance or mitigation of these risks. Assessing these risks generally involves defining or following key statistical metrics such as the Tracking-error (hedge funds or ETF) or the Value at Risk to name few but not necessarily. Recent developments in behavioural finance show that investors tend to grant higher attention to metrics other than numerical such as a herd behaviour or anchoring (investing in a specific product perceive to be better). Within the framework of this indicator and the module overall, the PRI do not promote any specific approach of risk management but rather the signatory should be able to identify and report on these risks. **Financial performance** Financial performance, also known as financial return, is the amount lost (negative return) or realised (positive return) on an investment. The simplest measure of the financial performance of an investment is the variation rate (expressed in percentages) across 2 periods. Other measures of this kind include ratios such as the Return on Equity (ROE), Return on Assets (ROA) or the Price-Earnings ratio (P/E ratio). Financial performance can also be expressed in nominal value, in such case it merely reflects all changes in value that occurred over a stated period of time. The NAV (net asset value) of the fund used as a measure of the fund's performance.
LOGIC	
HF 05	Sub-indicator HF 05.2 will be applicable if "Yes" is selected.

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SECTION

Investment process

HF 06	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle GENERAL

HF 06	INDICATOR	
HF 06.1	Please describe the ESG resources and tools used in your investment decision-making process.	
	Category of ESG	**Reason for use**
	❑ ESG data (proprietary, 3rd party, etc.)	
	❑ ESG research (broker, etc.)	
	❑ Consultants	
	❑ Other resources/tools/practices	

HF 06.2	Select and explain how these resources are incorporated into the investment and risk management process?		
	Category of ESG	**Investment/risk management process**	**Additional text** [OPTIONAL]
	ESG data (proprietary, 3rd party, etc.)	❑ Investment origination ❑ Investment analysis ❑ Portfolio construction ❑ Trade management ❑ Risk management	
	ESG research (broker, etc.)	Same as above	
	Consultants	Same as above	
	Other resources/tools/practices	Same as above	

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PRI Principles for Responsible Investment

HF 06	EXPLANATORY NOTES
HF 06.1	**ESG resources** Identifying and relying on key ESG resources is perceived as an important step in any pre-investment process. We identified here 4 broad categories of ESG resources that could be used as an essential source of information to incorporate responsible investment into Hedge Funds.
HF 06.2	**How the resources are used** ESG resources can be used at different levels of the investment process: origination, analysis, portfolio construction, trade management or monitoring risks. Any hedge fund manager should be able to identify one or several steps of the investment process in which ESG factors have been incorporated.
LOGIC	
HF 06.2	The selection options within HF 06.2 are applicable only if they have been selected in HF 06.1.

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HF 07	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle 1,2

HF 07	INDICATOR		
HF 07.1	If your organisation uses **quantitative analysis**, please indicate at which level ESG is incorporated into this analysis.		
	Quantitative modelling	**ESG incorporation**	**Outcomes and assessment/review**
	❑ Multi-factors models ❑ Fractal Market Hypothesis (FMH) modelling ❑ Models Yield ❑ Technical analysis (Fibonacci retracements, Bollinger bands, etc.) ❑ Univariate models (Box-Jenkins) ❑ Monte-Carlo simulations ❑ Multiple regression analysis ❑ Correlation analysis ❑ Other, specify____	❑ Pre-defined ESG parameters are added to our quantitative models. ❑ We conduct scenario analysis to define ESG parameters separately. ❑ Variance/Value at Risk analysis with embedded ESG risks. ❑ Other, specify____	
	❍ **We don't use quantitative analysis**		
HF 07.2	If your organisation uses **fundamental analysis**, please indicate at which level ESG is incorporated into this analysis.		
	Fundamental approach	**ESG incorporation**	**Outcomes and assessment/review**
	❑ Top-down ❑ Bottom-up	❑ At a micro level – ESG factors are integrated into financial models (DCF, multiples, etc.) ❑ Financial ratios with embedded ESG factors. ❑ At a macro level – ESG factors are embedded with economic indicators (GDP, inflation, etc.) ❑ Other, specify ()	
	❍ **We don't use fundamental analysis**		
HF 07.3	Additional information [OPTIONAL]		

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HF 07	EXPLANATORY NOTES
HF 07.1	**Quantitative analysis** Different quantitative approaches can be used alone or in conjunction to incorporate ESG factors. A non-restricted list of such approaches is disclosed below.. ***Multi factor models*** A financial model using multiple factors to explain prices of a security/portfolio of securities. Well-known models include the CAPM and the Fama-French Three Factor Model. ***Fractal Market Hypothesis (FMH)*** FMH-based models explain market prices using the concept of fractals. Prices are viewed as geometric shapes broken down in smaller parts replicating the shape on the whole. Investors using fractal models generally admit that prices are **not log-normally** distributed as in other models such as the multi-factor ones. ***Model yields*** These models are used to determine the yield of a specific security (such as fixed-income or stocks) or a fund. The yield of an investment is positively correlated to the level of its risk but negatively correlated to the price: the higher the risk, the higher the yield and the lower the price. ***Technical analysis*** Originally developed and used by traders, this category of analysis evaluates investments by analysing statistical trends such as price movements or volumes. Prices are assumed not to be randomly distributed and follow indeed specific patterns. A discipline on itself, technical analysis involves many statistical tools such as Bollinger Bands, Fibonacci retracements, Elliott Waves, etc. ***Monte-Carlo simulations*** A probability simulation that project possible prices trajectories by evaluating the associated risks for a given investment. Contrary to other quantitative closed-form solution models (such as those derived from the Black & Scholes model), Monte-Carlo simulations provide a range of possible trajectories. ***Univariate models*** These models are generally used to forecast data such as prices from a specified time series, they involve generally 1 variable. The Box-Jenkins model is one of the most well-known forecasting model using autoregression, moving averages and seasonal differencing. **Value at Risk (VaR)** A statistic measure of the level of financial risk within a firm, portfolio or a position. It determines the potential losses, the probability of occurrence for the amount of loss and a specific time frame.
HF 07.2	**Fundamental analysis** Fundamental analysis is an investment approach of evaluating a security in order to assess its intrinsic value by taking into account quantitative and qualitative factors. This approach is divided into two main and opposite approaches, bottom-up and top-down. ***Bottom-up*** This investment approach focusses on the analysis of individual securities (and to such extent on underlying companies) with lesser importance granted to macroeconomic factors. ***Top-down*** In this approach, the investor prioritises macroeconomic factors over the microeconomic ones.

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PRI Principles for Responsible Investment

HF 08	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle 1,6

HF 08	INDICATOR	
HF 08.1	Please indicate whether there have been any changes to your RI incorporation process over the past 12 months (e.g., additional resources, information sources)?	
	❍ Yes	❍ No
HF 08.2	If yes, please describe them.	
HF 08.3	If not, please explain why.	

HF 08	EXPLANATORY NOTES
HF 08	**RI incorporation process** This indicator measures your progress or changes in the incorporation of ESG factors in your investment process according to the different RI methodologies. Specifically, you can report whether some initial RI decisions have been changed or not and what these changes entail. A couple of typical examples are listed below: You may developed a RI policy but you haven't adopted or implemented You have developed a new product under ESG considerations You might have relied on a specific ESG data provider and decided in the course of the year to change for another one. Your organisation decided to modify how ESG risks are assessed and monitored: for example, setting up new KPI or integrating new constraints. Your investment decisions overall gradually incorporated new approaches: for instance, your organisation might have regularly followed a fundamental approach and decided to supplement/integrate quantitative analysis.
LOGIC	
HF 08	[HF 08.2] and [HF 08.3] are applicable depending on the selection in [HF 08.1].

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PRI Principles for Responsible Investment

HF 09	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle 1,2

HF 09	INDICATOR	
HF 09	Please select and explain how active ownership practices are integrated into investment decisions.	
	❑ (Proxy) Voting	
	❑ Engagement	
	❑ Shareholder resolutions	
	❍ None of the above	
	❍ **Not applicable (N/A)**	

HF 09	EXPLANATORY NOTES
HF 09	**Active Ownership practices** Active ownership is a post investment methodology; and it's a function of the holding period of the security. Asset owners or fiduciaries use their shareholder rights (or other legal or contractual rights) to influence companies (or other invested entities) to improve the ESG-risk management of companies or stimulate more sustainable business practises, products and services. Shareholder rights include voting rights, individual or collaborative engagement and (if necessary) litigation. ESG-issues can be incorporated in voting policies and voting decisions. Engagement can be done individually and /or collaboratively to try to influence companies (and other invest entities) to improve their ESG-performance or sustainability. For some hedge funds strategies, active ownership is not applicable as a result of the holding period of the security. Please refer to the PRI – HF Responsible Investment Guide available in January 2019.

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HF 10	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle 1,2

HF 10	INDICATOR					
HF 10.1	Please provide examples of ESG risks and opportunities being incorporated into your investment decisions over the past 12 months.					
	Hedge Fund strategy	**ESG factors**	**ESG risks / opportunities**	**Financial risks**	**Scope and process**	**Outcomes**
	[drop down -several selections] ❑ Global macro ❑ Equity hedge ❑ Event driven ❑ Relative value ❑ Risk parity ❑ Blockchain ❑ Fund of Hedge Funds	*[drop down – 1 selection per example]* ❑ Environmental ❑ Social ❑ Governance				
	[same as above]	[same as above]				
	[same as above]	[same as above]				
	[same as above]	[same as above]				
	[same as above]	[same as above]				
	❍ **We are not able to provide examples**					

HF 10.2	Based on your example(s) provided above, please specify whether the incorporation of ESG factors affected the risk-adjusted returns of your Hedge Funds.
	❍ The incorporation of ESG risks positively affected the risk-adjusted returns of our Hedge Funds ❍ The incorporation of ESG risks negatively affected the risk-adjusted returns of our Hedge Funds ❍ The incorporation of ESG risks had an overall neutral effect on the risk adjusted returns of the hedge funds ❍ No impact or **we do not track this information.**

HF 10	EXPLANATORY NOTES
HF 10.1	**Identification of ESG risks and opportunities** In this sub-indicator, you can report for one 1 or several strategies which E, S or G factor you identified, what were the ESG risks and/or opportunities and the outcomes of your investment decisions. A valid example would have for a given E,S or G factor all columns filled. ***Financial risks*** The risks associated with any investment in a company or security associated to the company. Key risks would include credit risk, liquidity risk, currency risk, equity risks. ***Scope and process*** This section would provide room for the following questions: *What is the chosen investment approach (fundamental, quantitative, etc.) of the managers?* *How the risks are monitored and/or mitigated?* ***Outcomes*** This section would for instance address the following concerns: *What were the results of the investment process, any opportunity or hindrances encountered? How these have been addressed? Have they been communicated to key stakeholders?*
HF 10.2	**Risk-adjusted return** A measure determining an investment's return by assessing the level of risk involved in producing that level of return. Most common measures used in the industry are: **Alpha, Beta, Standard deviation, Treynor ratio.** **Neutral impact (or risk neutral)** Risk neutral defines an investor approach indifferent to the level of potential risk generated by an investment. In such configuration, the risks can be higher than expected but eventually ignored to focus on the potential additional gains. This definition excludes de facto a "no impact" situation in which ESG risks have not affected the risk-adjusted returns of the funds. **"No impact or we do not track this information"** Your organisation can select this choice to indicate one of the following 3 situations: This information is not monitored, This information is known but for particular reason your organisation refuses to reveal it, or This information is known but there isn't any impact.

HF 11	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle GENERAL

HF 11	INDICATOR	
HF 11.1	Do you use derivatives instruments as part of your Hedge Fund strategies and/or Funds of Hedge Funds?	
	❍ Yes	❍ No
HF 11.2	Please select all the applicable categories of derivatives used.	
	Listed/OTC	**Category of derivatives**
	❍ Listed derivatives	❑ Futures ❑ Options (Equity, Index, ETF, FX, IR, etc.) ❑ Other (please specify) ❍ None of the above
	❍ OTC derivatives	❑ Swaps ❑ FRA ❑ Exotic derivatives ❑ CDS ❑ Other (please specify) ❍ None of the above
HF 11.3	Please explain whether and how these derivatives impacted the risk-adjusted returns of your Hedge Fund investments?	
	Impact	**Outcomes**
	❍ Positive impact	
	❍ Negative impact	
	❍ Neutral impact	
	❍ **No impact or we do not track this information**	
HF 11.4	Please indicate whether the use of derivatives triggered ESG risks/opportunities at the fund level?	
	❍ Yes	❍ No, or **undetermined**
HF 11.5	Additional information [OPTIONAL]	

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HF 11	DEFINITIONS
Derivatives	A financial security between two or more parties and whose the value derives from an underlying asset or basket of assets.
Listed derivatives	Also known as exchange traded derivatives, these financial instruments are traded on regulated derivatives exchanges or other exchanges such as CME or Eurex. Most common derivatives products traded on these markets are ***futures*** and ***listed options***. ***Futures*** A financial contract obliging the investor to buy or sell an asset on a future date at a specified price. ***Options*** A financial contract giving the investor the right but not the obligation to buy (a call option) or sell (a put option) an asset.
Over-the-Counter (OTC) derivatives	These financial instruments are directly and privately traded between two parties without going to an exchange. Most common OTC derivatives contracts are ***swaps***, ***Forward Rate Agreements (FRA)*** and ***exotic derivatives.*** ***Swap*** A financial contract to exchange cash on/before a specified future date based on the underlying value of exchange rates, interest rates, equity or other assets. ***Forward Rate Agreements (FRA)*** Similar to futures contract, a forward is a bespoke financial contract between two parties engaged in buying or selling an asset on a future date at a specified price. ***Exotic derivatives*** Contrary to traditional derivatives, these financial products involve much more complexity in calculating the payoff and the price. Typical instruments of this kind would encompass swaptions, exotic options and other specific contracts such as weather derivatives.
Neutral impact	Also defined as "risk neutral", this is an investor approach indifferent to the level of potential risk generated by an investment. In such configuration, the risks can be higher than expected but eventually ignored to focus on the potential additional gains. This definition excludes de facto a "no impact" situation in which ESG risks have not affected the risk-adjusted returns of the funds.
No impact or we do not track this information	Your organisation can select this choice to indicate the following 3 situations: This information is not monitored, This information is known but for particular reason your organisation cannot reveal it, or This information is known but there the impact is null.

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PRI Principles for Responsible Investment

Derivatives and ESG risk/opportunities	Your organisation is provided with the opportunity to report whether derivatives instruments triggered ESG risks and/or ESG opportunities. In other words, would your organisation track the ESG impact of derivatives at the fund level and is able to identify and measure that impact.
No/undetermined	Please select this choice if your organisation: Does not track this information, or Is unable to determine this information
LOGIC	
HF 11	Sub-indicators HF 11.2, 11.3, 11.4 and 11.5 will be available if "**yes**" is selected in HF 11.1.

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SECTION

Monitoring and reporting

HF 12	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle 1,2

HF 12	INDICATOR		
HF 12.1	Please indicate whether you report separately on your funds' long/short/net exposures?		
	❍ Yes	❍ No or **Not applicable**, please explain _____	
HF 12.2	Please explain your reporting process.		
	Exposure	**ESG data/reporting process**	**KPI and assessment**
	❑ Long exposure		
	❑ Short exposure		
	❑ Net exposure		
HF 12.3	Additional information [OPTIONAL]		

HF 12	EXPLANATORY NOTES
HF 12.2	For each category of exposures, your organisation is invited to indicate how the reporting process is conducted, which KPI is set or used and how this approach is assessed overall.
LOGIC	
HF 12	HF 12.2 and HF 12.3 will **not be applicable** if L/S is not used as a strategy, OR if the reporting cannot be differentiated in terms of exposures.

HF 12	DEFINITIONS
Net exposure	A measure expressed in percentage of the difference between long and short exposures. At the fund level, three situations can be identified: Long exposures exceed short exposure: **net long** exposure. Short exposures exceed long exposures: **net short** exposure. Long and short exposures are equals: **market neutral** (net exposure is 0).
Not applicable	Please select this choice if Long or Short exposures are not used in your strategies or you are not conducting any differentiation between the two exposures.

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PRI Principles for Responsible Investment

HF 13	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle 1,2

HF 13	INDICATOR				
HF 13.1	Please describe what metrics/initiatives (internal and/or external) your organisation uses to measure its progress in incorporating RI into the investment process.				
	Hedge Fund strategy	**Metrics/Initiatives**	**Internal/external**	**Metrics/ Initiatives definition**	**Assessment/ outcomes**
	[drop down - one selection] ❑ Global macro ❑ Equity hedge ❑ Event driven ❑ Relative value ❑ Fund of Hedge Funds ❑ Risk parity ❑ Blockchain	*[drop down - several selections]* **Metrics** ❑ RI policy implementation ❑ RI Recommendation changes ❑ ESG Alpha ❑ ESG Beta ❑ GHG emissions **Initiatives** ❑ Transparency ❑ Integration of ESG data ❑ Education ❑ Other (specify)	*[drop down]* ❍ Internal ❍ External		
	[same as above]	[same as above]	[same as above]		
	[same as above]	[same as above]	[same as above]		
	[same as above]	[same as above]	[same as above]		
	[same as above]	[same as above]	[same as above]		
	❍ **We are not able to provide examples.**				
HF 13.2	Additional information [OPTIONAL]				

HF 13	DEFINITIONS
ESG Alpha	This metric refers to excess return of an investment relative to the return of a benchmark index when ESG factors are incorporated into the investment process as a source of return
ESG Beta	This metric refers to the volatility of an asset or portfolio in relation to the overall market when ESG factors are incorporated into the investment process as a source of risk.

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PRI Principles for Responsible Investment

HF 14	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle GENERAL

HF 14	INDICATOR			
HF 14.1	Does your organisation assess its funds' exposure to climate-related risks, and does it measure and monitor the carbon footprint of its investment portfolio?			
	❍ Yes	❍ No		
HF 14.2	If yes, explain the methodology used and the assessment process.			
	Hedge Fund strategy	**KPI**	**Methodology**	**Assessment**
	[drop down -one selection] ❑ Global macro ❑ Equity hedge ❑ Event driven ❑ Relative value ❑ Funds of Hedge Funds ❑ Risk parity ❑ Blockchain	*[drop down - several selections]* ❑ Climate-related targets ❑ Weighted average carbon intensity ❑ Carbon footprint (scope 1 and 2) ❑ Portfolio carbon footprint ❑ Total carbon emissions ❑ Carbon intensity ❑ Exposure to carbon-related assets ❑ Other emissions metrics		
	[same as above]	[same as above]		
	[same as above]	[same as above]		
	[same as above]	[same as above]		
	[same as above]	[same as above]		
HF 14.3	If your answer is "No" in HF 14.1, please explain why.			

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HF 14	EXPLANATORY NOTES
HF 14.1	**Climate risks** Here we refer to all risks resulting from the climate change and affect natural and human systems. Climate change presents both risks and opportunities. This indicator covers how climate change impacts your investment decision making, active ownership practices and if relevant, engagement with fund managers, as well as engagement with governments to encourage a climate-supportive policy environment for investors.
HF 14.2	Your organisation is invited to report whether climate-related risks, when applicable, are taken into account in the hedge fund strategy followed. For each applicable strategy, please identify whether you incorporated one or several KPIs as listed, the methodology followed and the assessment in place. A valid example would include all of the elements above. Activities to measure and reduce your organisation's own carbon footprint should not be captured here, unless they are undertaken for buildings that you occupy and report on as part of a directly managed property portfolio. **Weighted Average Carbon Intensity** Portfolio's exposure to carbon-intensive companies, expressed in tons CO2e / $M revenue. *Metric recommended by the FSB Task Force.* **Carbon Intensity** Volume of carbon emissions per million dollars of revenue (carbon efficiency of a portfolio), expressed in tons CO2e / $M revenue. **Total Carbon Emissions** The absolute greenhouse gas emissions associated with a portfolio, expressed in tons CO2e. **Carbon Footprint** Total carbon emissions for a portfolio normalized by the market value of the portfolio, expressed in tons CO2e / $M invested. Further information and guidance on this topic are available in the SG module (SG 14) and the Climate Change reporting.
LOGIC	
HF 14	If "No" is selected in HF 14.1, HF 14.2 is not applicable.

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HF 15	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle 2, 6

HF 15	INDICATOR				
HF 15.1	How often and in what format (e.g., meetings, written reports) does your organisation report to its investors on ESG risk assessments? Please provide reporting examples.				
	Frequency of reporting	**Format**	**ESG activities**	**Portfolio ESG risk assessment**	**Outcomes**
	[drop down - one selection] ❍ Annually ❍ More frequently than annually ❍ Other	*[drop down - several selections]* ❑ Minutes of meetings ❑ Written reports ❑ Side letters/emails ❑ Other (specify)	*[drop down - several selections]* ❑ Environmental ❑ Social ❑ Governance	*[drop down - several selections]* ❑ Fund governance ❑ Linear constraints ❑ Quadratic constraints ❑ Other (specify)	
	[same as above]	[same as above]	[same as above]	[same as above]	
	[same as above]	[same as above]	[same as above]	[same as above]	
	[same as above]	[same as above]	[same as above]	[same as above]	
	[same as above]	[same as above]	[same as above]	[same as above]	
	❍ **We are not able to provide examples.**				
HF 15.2	Additional information [OPTIONAL]				

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HF 15	EXPLANATORY NOTES
HF 15.1	A sound reporting on ESG risks assessments to investors is not only considered good practice but also demonstrates a resilient governance. A valid reporting example would include at least one element for each column in a given row. **Linear constraints** Assessing the level of ESG risks might be evaluated through a linear optimization: the objective function (e.g. minimising the level of ESG risk) is subject to constraint functions that are **linear**. **Quadratic constraints** Assessing the level of ESG risks could involve quadratic optimization: the objective function (e.g. minimising the level of risk) is subject to constraint functions that are **quadratic.** For further information, please refer to the **PRI – HF Responsible Investment Guide that will be available in January 2019.**
LOGIC	
HF 15	HF 15.2 is applicable irrespective of whether your organisation provides examples in HF 15.1 or not.

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PRI REPORTING FRAMEWORK 2019
Closing Module

November 2018

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UNEP Finance Initiative
Changing finance, financing change

United Nations Global Compact

An investor initiative in partnership with UNEP Finance Initiative and UN Global Compact

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), the purpose of the indicator, and which PRI Principle it relates to.

	Indicator status	Purpose	Principle
xxx 01	*MANDATORY*	*CORE ASSESSED*	*PRI 2*

Indicator status

MANDATORY	Mandatory indicators reflect core practices. These responses will be made public and must be completed to submit the framework.
MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	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 may also contain commercially sensitive information.
VOLUNTARY	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.
Peering	These indicators are used to determine your peer groups for assessment purposes.
Core assessed	These indicators form the core of the assessment, and represent the majority of your final assessment score.
Additional assessed	These indicators represent more advanced or alternative practices and contribute to a smaller part of your score.
Descriptive	These are open-ended narrative indicators, allowing 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	**EXPLANATORY NOTES**
xxx 01.1	This provides guidance on how to interpret the sub-indicators, including examples of what could be reported.
xxx 01.2	
LOGIC	
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.
ASSESSMENT	
xxx 01	This provides a brief overview of the pilot assessment approach for this indicator.

xxx 01	**DEFINITIONS**
xxx 01	Definitions of specific terms that are used in the indicator are defined here.

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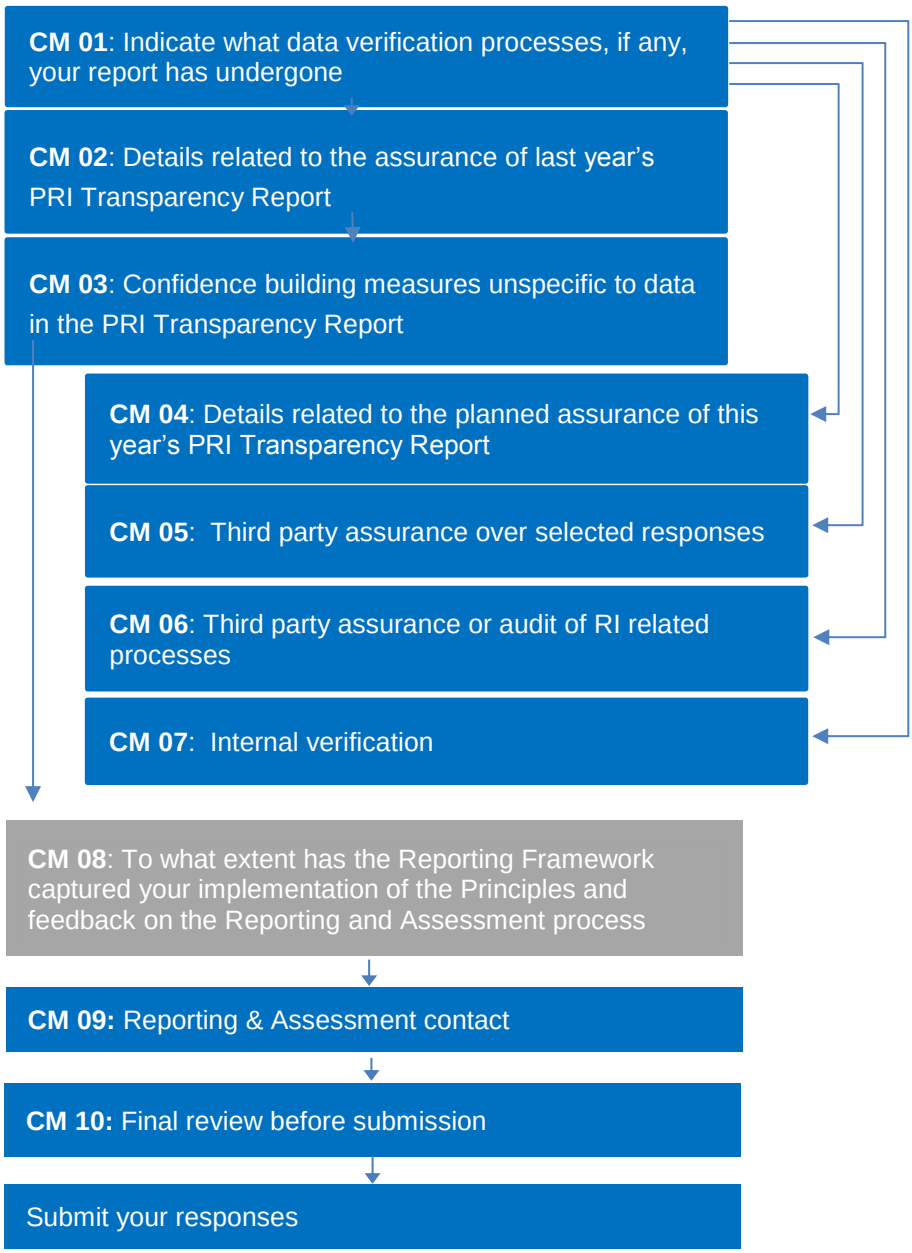
Pathways through the module



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Preface

This module invites you to provide feedback on the PRI reporting framework and gives you the opportunity to review the information you have reported before you submit.

Summary of updates

2018 Indicator	Update summary
CM 01	Previous sub-indicators CM 01.1 – CM 01.13 have been amended and renumbered into separate indicators CM 01 – CM 07. Section has been renamed.
CM 02, 04-05	Renumbered and sub-indicators and/or definitions have been added.
CM 03	Removed.

To view a detailed summary of changes to the module, please click here.

For any word limit in the module, please click here.

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SECTION

Confidence building measures

CM 01	Indicator status MANDARTORY	Purpose ADDITIONALLY ASSESSED	Principle GENERAL

CM 01	INDICATOR
CM 01.1	Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone: ❑ Third party assurance over selected responses from this year's PRI Transparency Report ❑ Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year ❑ Third party assurance or audit of the correct implementation of RI processes (that have been reported to the PRI this year) ❑ Internal audit of the correct implementation of RI processes and/or accuracy of RI data (that have been reported to the PRI this year) ❑ Internal verification of responses before submission to the PRI (e.g. by the CEO or the board) ❍ Whole PRI Transparency Report has been internally verified ❍ Selected data has been internally verified ❑ Other, specify_____ ❑ None of the above
CM 01.2	Additional information [OPTIONAL]

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CM 01	EXPLANATORY NOTES	
CM 01.1	There are several options for signatories to strengthen the confidence of their responses to the Reporting Framework. Read more about it here. The PRI does not favour certain confidence building measures over others in its scoring methodology. Please select respective answer option if respective party reviewed, validated and/or assured your reported information. This is specific to information reported to the PRI and therefore used in PRI Transparency Reports for **this reporting year**. Please select ' Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year.' if you have taken assured data from other sources (for example a CSR report or Integrated Report) and included these data points in your PRI response this year. For more information on the types of assurance options reported by PRI signatories and how these options relate to reported data within PRI Transparency Reports, please see PRIs position paper on PRI signatories and assurance	
CM 01.2	This could include a discussion of the scope; your reasons for choosing the particular assurance/verification measure; feedback you have had from stakeholders on your assurance/verification activities; the benefits of undertaking these activities to your organisation; key findings and recommendations following the assurance/verification activity and how your organisation has implemented or plan to implement these recommendations.	
LOGIC		
CM 01	If you report 'Third party assurance over selected responses from this year's PRI Transparency Report', [CM 05] will unlock for you. This selection option will lock [CM 04] If you report 'Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year', [CM 05] will unlock for you. If you report 'Third party assurance or audit of the correct implementation of RI processes (that have been reported to the PRI this year)' or 'Internal audit of the correct implementation of RI processes and/or accuracy of RI data (that have been reported to the PRI this year)', [CM 06] will unlock for you. If you report 'Internal verification of responses before submission to the PRI (e.g. by the CEO or the board)', [CM 07] will unlock for you.	
ASSESSMENT		
CM 01	The response to indicator CM 01 is assessed as part of your score for the Strategy and Governance module. There is no module score for the Closing Module.	
	Indicator scoring methodology	
	Selected response	**Level score**

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	“None of the above” or “Other” selected in CM 01.1	⭘
	One option selected from CM 01.1	★★
	Two options or more selected from CM 01.1	★★★

CM 01	DEFINITIONS
Third party assurance	Assurance engagements conducted by independent third parties, following an assurance standard and resulting in a public conclusion over the reliability of the data reported.
Internal verification/review	Senior staff, the board, a particular department within the organisation or a working group have reviewed certain/all PRI responses before they are submitted.
Third party assurance or audit of the correct implementation of RI processes	Typically takes two forms: Audits conducted by independent third parties, following an assurance standard which are designed to give management confidence that sufficient controls are in place to ensure responsible investment policies are followed (no statement is made over data quality, and usually no public statement is made). Audits conducted by independent third parties which are designed to give confidence to clients in outsourced services, such as investment management (no statement is made over data quality, and usually no public statement is made).
Internal audit conducted by internal auditors of the correct implementation of the RI process and/or RI data	Assurance conducted by an internal auditor to an appropriate assurance standard (e.g. The International Standards for the internal audit profession from the Global Institute of Internal Auditors). Designed to give independent (in that the auditor is removed from the process) assurance that an organisation's risk management, governance and internal control processes are operating effectively. It is fundamentally concerned with evaluating an organisation’s management of risk. For example, an internal auditor will assess the quality of risk management processes, systems of internal control and corporate governance processes and report to the management/the board. For more information, see www.iia.org.uk.
What PRI does NOT consider relevant	
Third party assistance in the preparation of data	A consultant helped to compile the reporting (audit standards typically preclude the preparer of any report from auditing it, as they are no longer independent).
Receipt of data from a third party	Some or all of the data had been received from a third party (e.g. a voting provider).

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CM 02	Indicator status MANDARTORY	Purpose DESCRIPTIVE	Principle GENERAL

CM 02	INDICATOR
CM 02.1	We undertook third party assurance on last year's PRI Transparency Report
	❍ Whole PRI Transparency Report was assured last year ❍ Selected data was assured in last year's PRI Transparency Report ❍ We did not assure last year's PRI Transparency report ❍ None of the above, we were in our preparation year and did not report last year
CM 02.2	Provide details of the third party assurance related to the whole or selected data from last year's PRI Transparency Report

What data has been assured	Relevant modules	Who has conducted the assurance	Assurance standard used	Level of assurance sought	Link to external assurance provider 's report
❑ Financial and organisational data ❑ Data related to RI activities ❑ RI Policies ❑ RI Processes (e.g. engagement process) ❑ ESG operational data of the portfolio ❑ Other, specify___	[Checkbox of modules] ❑ Organisational Overview ❑ Module 2 ❑ Module 3 etc		❑ ISAE/ ASEA 3000 ❑ ISAE 3402 ❑ ISO standard, specify____ ❑ AAF01/06 ❑ AA1000AS ❑ IFC performance standards ❑ ASAE 3410 Assurance Engagements on Greenhouse Gas Statements. ❑ National standard, specify____ ❑ Other, specify____	❍ Limited or equivalent ❍Reasonable or equivalent	[URL]

CM 02.3	Additional information [OPTIONAL]

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CM 02	EXPLANATORY NOTES
CM 02.1	Please select respective answer option if you undertook independent assurance by a third party which was specific to last year's PRI Transparency Report.
LOGIC	
CM 02.1	[CM 02.2] will be applicable if 'Whole PRI Transparency Report was assured last year' or 'Selected data was assured in last year's PRI Transparency Report' is reported in [CM 02.1]

CM 02	DEFINITIONS
Level of Assurance Sought	There are often two different types of assurance engagement. For example, ISAE3000 uses 'limited assurance' and 'reasonable assurance' and AA1000 uses 'high' and 'moderate' levels of assurance. Reasonable assurance provides higher level of confidence than a limited assurance engagement, and reviews to a degree the processes for gathering the data or of the information itself in the case of RI processes. As per the IFAC definitions, in a reasonable assurance the practitioner expresses the conclusion in the positive form, such as "In our opinion internal control is effective, in all material respects, based on *XYZ criteria*." In a limited assurance, the practitioner expresses the conclusion in a negative form, such as " nothing has come to our attention that causes us to believe that internal control is not effective, in all material respects, based on *XYZ criteria*

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CM 03	Indicator status MANDARTORY	Purpose DESCRIPTIVE	Principle GENERAL

CM 03	INDICATOR	
CM 03.1	We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:	
	❑ We adhere to an RI certification or labelling scheme ❑ We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report ❑ ESG audit of holdings ❑ Other, specify_____ ❑ None of the above	
CM 03.2	We adhere to an RI certification or labelling scheme	
	Which scheme?	**% of total AUM the scheme applies**
	❑ National SRI label based on the EUROSIF Transparency guidelines	❍ < 25% ❍ 25-50 % ❍ 50-70 % ❍ >75 % [radio]
	❑ B-corporation	[same as above]
	❑ UK Stewardship code	[same as above]
	❑ GRESB	[same as above]
	❑ Commodity type label (e.g. BCI), specify____	[same as above]
	❑ Social label, specify____	[same as above]

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	❑ Climate label, specify____	[same as above]
	❑ RIAA	[same as above]
	❑ Other, specify____	[same as above]
CM 03.3	Provide a link to the public report (such as a sustainability report that you carry out third party assurance over and for which you have used extracts of in this year's PRI Transparency Report. Also include a link to the external assurance provider 's report.	
	Link to sustainability/RI/integrated report	**Link to external assurance provider 's report**
	[URL]	[URL]
CM 03.4	Describe the process of external/third party ESG audit of holdings, including which data has been assured.	
CM 03.5	Additional information [OPTIONAL]	

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CM 03	EXPLANATORY NOTES
CM 03.1	Please select respective answer option if you undertake confidence building measures that are unspecific to the data reported to the PRI this year but are nonetheless useful for building stakeholder confidence in your RI activities. For example, if your organisation adheres to a fund certification or labelling scheme, this would have no relevance to assurance and verification of the responses you have provided to the PRI (unless this has been reported to the PRI). However, it does build stakeholder confidence in your RI activities more generally. Similarly, if your organisation has had a **whole public report** assured such as a CSR or Integrated Report and you have included extracts of this report in your PRI Transparency Report - this would seek to build confidence in your RI activities but would not specifically relate to the data within the PRI Transparency Report as it would be unclear which aspects of the public report have been assured.
LOGIC	
CM 03	[CM 03.2] will unlock if you select 'We adhere to an RI certification or labelling scheme' in [CM 03.1] [CM 03.3] will unlock if you select 'We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report' in [CM 03.1] [CM 03.4] will unlock if you select 'ESG audit of holdings' in [CM 03.1]

CM 03	DEFINITIONS
RI Certification or labelling scheme	Organisation or fund level labels or certifications, such as the Luxembourg Fund Labelling Agency (LuxFLAG), or those provided by sustainability initiatives.
Independent/third party assurance over a public report	Evidence of a third party assurance engagement, where a public conclusion was made over the reliability of another form of RI reporting (excluding PRI Transparency Reports), typically a CSR, RI, Sustainability or Integrated Report.
External/third party ESG audit of holdings	Investors that seek to understand the ESG characteristics of the companies they are holding and undertake assurance. Typically, the assurance is over the investors own processes for collecting, calculating and/or presenting data.

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CM 04	Indicator status MANDARTORY	Purpose DESCRIPTIVE	Principle GENERAL

CM 04	INDICATOR
CM 04.1	We plan to assure this year's PRI Transparency report ❍ Whole PRI Transparency Report will be assured ❍ Selected data will be assured ❍ We do not plan to assure this year's PRI Transparency report

CM 04.2

Provide details related to the assurance that will be conducted for the whole – or selected data of the - PRI Transparency Report

Expected date the assurance will be complete	What data will be assured	Relevant Modules	Who will conduct the assurance	Assurance standard to be used	Level of assurance sought
[date]	❑ Financial and organisational data ❑ Data related to RI activities ❑ RI policies ❑ RI processes (e.g. engagement process) ❑ ESG operational data of the portfolio ❑ Other, specify___	[Checkbox of modules] ❑ Organisational Overview ❑ Module 2 ❑ Module 3 etc		❑ ISAE/ ASEA 3000 ❑ ISAE 3402 ❑ ISO standard, specify____ ❑ AAF01/06 ❑ AA1000AS ❑ IFC performance standards ❑ ASAE 3410 Assurance Engagements on Greenhouse Gas Statements. ❑ National standard, specify____ ❑ Other, specify____	❍ Limited or equivalent ❍Reasonable or equivalent

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CM 04.3	Additional information [OPTIONAL]

CM 04	EXPLANATORY NOTES
CM 04.1	Please select respective answer option if you plan to undertake independent assurance by a third party which is specific to this year's PRI Transparency Report.
LOGIC	
CM 04	[CM 04] will be applicable if you report any option but 'Third party assurance over selected responses from this year's PRI Transparency Report' in [CM 01.1] [CM 04.2] will be applicable if 'Whole PRI Transparency Report will be assured' or if 'Selected data will be assured' is reported in [CM 04.1]

CM 04	DEFINITIONS
Level of Assurance Sought	There are often two different types of assurance engagement. For example, ISAE3000 uses 'limited assurance' and 'reasonable assurance' and AA1000 uses 'high' and 'moderate' levels of assurance. Reasonable assurance provides higher level of confidence than a limited assurance engagement, and reviews to a degree the processes for gathering the data or of the information itself in the case of RI processes. As per the IFAC definitions, in a reasonable assurance the practitioner expresses the conclusion in the positive form, such as "In our opinion internal control is effective, in all material respects, based on *XYZ criteria*." In a limited assurance, the practitioner expresses the conclusion in a negative form, such as " nothing has come to our attention that causes us to believe that internal control is not effective, in all material respects, based on *XYZ criteria*

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CM 05	Indicator status MANDARTORY	Purpose DESCRIPTIVE	Principle GENERAL

CM 05	INDICATOR						
CM 05.1	Provide details related to the third party assurance over selected responses from this year's PRI Transparency Report and/or over data points from other sources that have subsequently been used in your PRI responses this year						
	What data has been assured	**Relevant modules**	**Who has conducted the assurance**	**Assurance standard used**	**Level of assurance sought**	**Link to external assurance provider's report**	**Link to original data source (if pubic)**
	❑ Financial and organisational data ❑ Data related to RI activities ❑ RI Policies ❑ RI Processes (e.g. engagement process) ❑ ESG operational data of the portfolio ❑ Other, specify___	[Checkbox of modules] ❑ Organisational Overview ❑ Module 2 ❑ Module 3 etc		❑ ISAE/ ASEA 3000 ❑ ISAE 3402 ❑ ISO standard, specify____ ❑ AAF01/06 ❑ AA1000AS ❑ IFC performance standards ❑ ASAE 3410 Assurance Engagements on Greenhouse Gas Statements. ❑ National standard, specify____ ❑ Other, specify____	❍ Limited or equivalent ❍Reasonable or equivalent		

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CM 05.2	Additional information [OPTIONAL]

CM 05	EXPLANATORY NOTES
CM 05.1	If you have done external assurance of both answers to the PRI report and of other data sources that have subsequently been used in your Transparency Report, please provide details of the assurance pertinent to the PRI Transparency Report. Explanation on type of information: • **Financial and operation data:** for example assets under management, asset allocation and number of staff • **ESG operational data of the portfolio:** such data can refer to carbon emissions, environmental impact, water consumption and waste generation which are particularly relevant to physical assets such as infrastructure, property, farmland, forestry, agriculture and inclusive finance • **RI data related to RI activities**: numerical or percentage type data that support RI activities, such as number of votes casted, % of companies engaged with, % of property assets with carbon targets, % of listed assets in active investments where ESG screening is applied • **RI processes**: such as engagement, screening, investment selection and manager selection processes. The assurance of this process is restricted to the existence of those processes within the wider strategy. If your organisations the correct implementation of these processes as described, please provide those details in CM_01.6 that covers the assurance of RI processes. **Standards**: please select the standard(s) used for the purpose of assuring your data.
LOGIC	
CM 05	[CM 05] will be applicable if you report 'Third party assurance over selected responses from this year's PRI Transparency Report' or 'Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year' in [CM 01.1]
EXAMPLE	

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Relevant sub-indicator CM 05.1:

What data has been assured	Relevant module	Who has conducted the assurance	Assurance standard used	Level of assurance sought	Link to original data source	Link to external assurance provider's report
Staff training on RI	Strategy and Governance	KMPG	AA1000	Limited	www.x.com	www.y.com

CM 05	DEFINITIONS
Level of Assurance Sought	There are often two different types of assurance engagement. For example, ISAE3000 uses 'limited assurance' and 'reasonable assurance' and AA1000 uses 'high' and 'moderate' levels of assurance. Reasonable assurance provides higher level of confidence than a limited assurance engagement, and reviews to a degree the processes for gathering the data or of the information itself in the case of RI processes. As per the IFAC definitions, in a reasonable assurance the practitioner expresses the conclusion in the positive form, such as "In our opinion internal control is effective, in all material respects, based on *XYZ criteria*." In a limited assurance, the practitioner expresses the conclusion in a negative form, such as " nothing has come to our attention that causes us to believe that internal control is not effective, in all material respects, based on *XYZ criteria*

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CM 06	Indicator status MANDARTORY	Purpose DESCRIPTIVE	Principle GENERAL

CM 06	INDICATOR				
CM 06.1	Provide details of the third party assurance or audit of RI related processes, and/or details of the internal audit conducted by internal auditors of RI related processes (that have been reported to the PRI this year)				
	What RI processes have been assured	**Who has conducted the assurance**	**When was the process assurance completed (dd/ mm/yy)**	**Assurance standard used**	**Level of assurance sought**
	❑ Data related to RI activities ❑ RI policies, specify [text] ❑ RI related governance ❑ Engagement processes ❑ Proxy voting process ❑ Integration process in listed assets ❑ Screening process in listed assets ❑ Thematic process in listed assets ❑ Investment selection process in non-listed assets ❑ Manager selection process for externally managed assets ❑ Manager appointment process for externally managed assets ❑ Manager monitoring process for externally managed assets ❑ Third party property manager SAM process ❑ Third party infrastructure operator SAM process			❑ IIA's International Standards for the Professional Practice of Internal Auditing ❑ ISAE 3402 ❑ ISO, specify____ ❑ AAF 01/06 ❑ SSE18 ❑ AT 101 (excluding financial data) ❑ Other, specify_____	❍ Limited or equivalent ❍Reasonable or equivalent

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	❑ ESG incorporation in selection process for private equity investments ❑ Post-investment ESG activities for infrastructure and/or property assets ❑ Other, specify___				
CM 06.2	Additional information [OPTIONAL]				

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LOGIC	
CM 06	[CM 06] will be applicable if you report 'Third party assurance or audit of the correct implementation of RI processes (that have been reported to the PRI this year)' or 'Internal audit of the correct implementation of RI processes and/or accuracy of RI data (that have been reported to the PRI this year)' in [CM 01.1] The options in [CM 06.1] is dependent on the RI processes reported in previous modules.
EXAMPLE	

Relevant sub-indicator CM 06.1:

What RI processes have been assured	Who has conducted the assurance	When was the process assurance undertaken (year/month)	Assurance standard used	Level of assurance sought
❑ Engagement processes	PwC	January 2017	❑ IIA's International Standards for the Professional Practice of Internal Auditing	❍ Reasonable or equivalent

CM 06	DEFINITIONS
Level of Assurance Sought	There are often two different types of assurance engagement. For example, ISAE3000 uses 'limited assurance' and 'reasonable assurance' and AA1000 uses 'high' and 'moderate' levels of assurance. Reasonable assurance provides higher level of confidence than a limited assurance engagement, and reviews to a degree the processes for gathering the data or of the information itself in the case of RI processes. As per the IFAC definitions, in a reasonable assurance the practitioner expresses the conclusion in the positive form, such as "In our opinion internal control is effective, in all material respects, based on *XYZ criteria*." In a limited assurance, the practitioner expresses the conclusion in a negative form, such as " nothing has come to our attention that causes us to believe that internal control is not effective, in all material respects, based on *XYZ criteria*

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CM 07	Indicator status MANDARTORY	Purpose DESCRIPTIVE	Principle GENERAL

CM 07	INDICATOR		
CM 07.1	Indicate who has reviewed/verified internally the whole - or selected data of the - PRI Transparency Report and if this applies to selected data please specify what data was reviewed.		
	Who has conducted the verification	**What data has been verified**	**Relevant modules**
	❑CEO or other Chief-Level staff ❑ Sign-off ❑ Review of all the responses	Each row has the following options: ❑ Policies ❑ Overarching strategy and processes ❑ Asset class specific processes, ❑ Quantitative data related to RI processes, ❑ Other, specify [text]	Each row shows checkboxes of modules completed: ❑ Organisational Overview ❑ Module 2 ❑ Module 3 etc
	❑ The Board ❑ Sign-off ❑ Review of all the responses		
	❑ Investment Committee ❑ Sign-off ❑ Review of all the responses		
	❑ Compliance Function		
	❑ RI/ESG Team		
	❑ Investment Teams		
	❑ Legal Department		
	❑ Other (specify)_____		

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CM 07.2	Additional information [OPTIONAL]

LOGIC	
CM 07	[CM 07] will be applicable if you report 'Internal verification of responses before submission to the PRI (e.g. by the CEO or the board)' in [CM 01.1]

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SECTION

Feedback

CM 08	Indicator status VOLUNTARY TO REPORT NOT DISCLOSED	Purpose DESCRIPTIVE	Principle GENERAL

CM 08	INDICATOR				
CM 08.1	Indicate to what extent the PRI reporting framework captures your implementation of the Principles.				
		To a large extent	To a moderate extent	To a small extent	Not at all
	Select the most appropriate	❍	❍	❍	❍
CM 08.2	If you selected 'to a small extent' or 'not at all', please suggest how the PRI Reporting Framework could better capture your implementation of the Principles.				
CM 08.3	Indicate the modules for which you have suggestions for improvements.				
	Module	Please suggest improvements and provide examples of specific indicators where issue(s) were identified.			
	Organisational Overview				
	Strategy & Governance				
	Climate change reporting				
	Listed equity (incorporation)				
	Listed equity (active ownership)				
	Fixed income				
	Private equity				
	Property				
	Infrastructure				
	Inclusive finance - Direct				
	Hedge Funds				
	Manager selection, appointment and monitoring				

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	Inclusive finance - Indirect	
	Closing module	
CM 08.4	If you have any additional suggestions or comments on the Reporting and Assessment process, share them here.	

CM 08	**EXPLANATORY NOTES**
CM 08	Your response will support efforts to improve the PRI reporting and assessment process.
LOGIC	
CM 0**8**.2	[CM 08.2] will be applicable if you selected 'to a small extent' or 'not at all' in [CM 08.1]
CM 0**8**.3	The modules available in [CM 08.3] are based upon your response in [OO 05], [OO 10] and [OO 11].

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SECTION

Contact details

CM 09	Indicator status MANDATORY TO REPORT NOT DISCLOSED	Purpose DESCRIPTIVE	Principle GENERAL

CM 09	INDICATOR			
CM 09.1	Provide primary, secondary and data portal contact person.			
		First name	Surname	Email address
	Primary contact			
	Secondary contact [OPTIONAL]			
	Data Portal contact 1			
	Data Portal contact 2 [OPTIONAL]			

CM 09	EXPLANATORY NOTES
CM 09	Primary and secondary contacts will be contacted in case of any queries around the reported information and will receive all follow up information about the Reporting and Assessment process. Data Portal contacts will be notified when important changes happen to the Data Portal, such as new functionalities, release of the assessment reports and any changes to the Terms and Conditions.

CM 09	DEFINITIONS
Data Portal	The Data Portal is a centralised web-based platform that allows signatories to view their own reports, request access to view other signatories' private transparency and assessment reports and vice-versa give access. It also allows users to export public responses and create lists to easily retrieve reports matching their filters.
Data Portal contact	There are two user types within the Data Portal, General Data Portal users and Data Portal contacts. In addition to all the other functionalities, the Data Portal contact has the authority to grant other signatories access to their signatory's full transparency and assessment report. This person should be approved by the senior management team of their organisation. To be a Data Portal Contact, the nominated person must be a direct employee with an official company email of your organisation. If your organisation has no staff and has a fiduciary manager, that person may act as your Data Portal Contact. However, the email address provided can only be matched to one signatory account.

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PRI Principles for Responsible Investment

SECTION

Final review and submission

CM 10	Indicator status MANDATORY TO REPORT NOT DISCLOSED	Purpose DESCRIPTIVE	Principle GENERAL

CM 10	INDICATOR
CM 10.1	Thank you for completing the PRI reporting framework. Click the link below to review how your reported information will be presented in your RI Transparency Report. The RI Transparency Report will be publicly disclosed. If you have responded incorrectly to any indicators, please return to these indicators in the Online Reporting Tool and adjust accordingly. **[REVIEW YOUR RI TRANSPARENCY REPORT]**
CM 10.2	Indicate whether you give PRI permission to publish any information you have marked as public, as well as the mandatory to disclose indicators. Once your report is submitted, you will not be able to modify your responses and information you have marked as public will automatically be published on the PRI website.
	❑ I give the PRI permission to publish any information I have marked as public (June 2018).
	❑ I do not give the PRI permissions to publish it (only applicable if you are in your preparation year).
CM 10.3	If you are selected, the PRI would like to use your public responses as part of the showcasing leadership work. Please untick if you do not want to be included.
	❑ I would like to be included in the PRI's showcasing leadership work.

CM 10	EXPLANATORY NOTES
CM 10.3	PRI will be using signatories reported information to identify and share good practices as part of the showcasing leadership work. The leadership resource will focus on particular areas or themes that will rotate on an annual basis allowing different types of signatories and different practices to be recognised. PRI will not be publishing a leadership board or a ranking table of signatories. You can read more here.
LOGIC	
CM 10.2	You will see the option not to publish your responses if you are completing the reporting as part of your preparation year (i.e. your first year as PRI signatory).
CM 10.3	Indicator [10.3] is applicable to Asset Owners only.

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