

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

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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.

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

Fulpose		
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 xxx 01.2	This provides guidance on how to interpret the sub-indicators, including examples of what could be reported.
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.

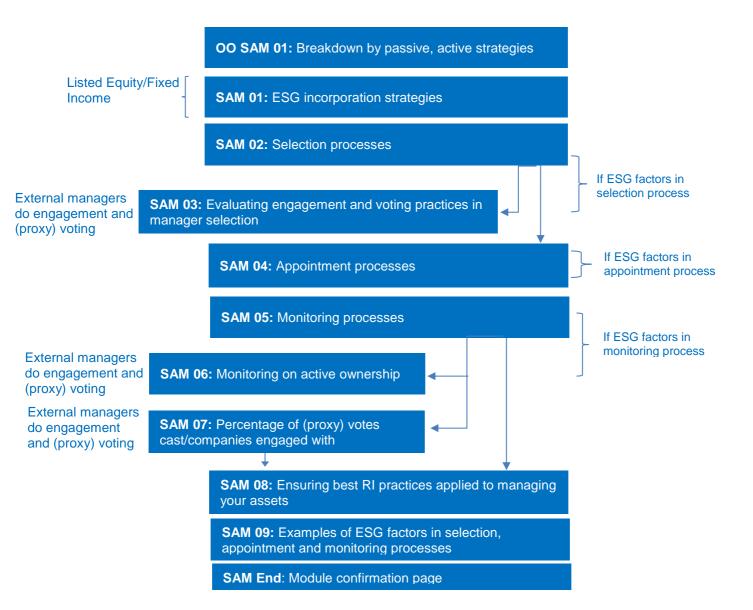


Table of Contents

Understanding this document	2
Pathways through the module	4
Preface	5
Listed equity (LE) and Fixed income (FI)	7
OVERVIEW	7
SELECTION	10
APPOINTMENT	21
MONITORING	26
Outputs and outcomes	35



Pathways through the module





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: <u>link.</u>

*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.



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 04.1 Selection options reworded and removed.	
	SAM 04.3 moved to the OO module.	
SAM 04	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 $\underline{\text{here.}}$

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



SECTION

Listed equity (LE) and Fixed income (FI)

OVERVIEW

SAM 01 Indicator status Purpose Principle 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 investmen	t strategie	s				
	Screening						
	Thematic						
	Integration						
	None of the above						
	Passive investme	nt strateg	ies				
	Screening						
	Thematic						
	Integration						
	None of the above						
SAM 01.2	Additional informat	ion					



SAM 01	EXPLANATORY NOTES
	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.
SAM 01.1	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 <u>asset owner interactive data report</u> available on the Data Portal and the PRI website.
LOGIC	
	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.
SAM 01	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 <u>Global Sustainable Investment Alliance</u>. These are presented below for convenience.

below for convenience	•
	The definitions of the three types of screening in the Reporting Framework are as follows:
Screening of	 negative/exclusionary screening: The exclusion from a fund or portfolio of certain sectors, companies or practices based on specific ESG criteria;
investments	 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:



	defining the investment universe based on investees' performance on international norms related to responsible investment/ESG factors; or	
	 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.





SAM 02 Indicator status 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						٠		
	ESG incorporation requirements								
	ESG reporting requirements								
	Other								
	No RI information covered in the selection documentation								
SAM 02.2	Explain how your organi investment strategy and				ger's ability to	align betw	een your		
		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					٥			



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 cons	truction/ir	vestment val	uation		
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					0
Review and agree ESG objectives (e.g. risk reduction, return seeking, real-world impact)	٥	٥			
Review and agree manager's ESG risk framework		٥			
Review and agree ESG risk limits at the portfolio level (portfolio construction) and other ESG objectives					



	Review how ESG materiality is evaluated by the manager				٥		٥	
	Review process for defining and communicating on ESG incidents							
	Review and agree ESG reporting frequency and detail				٥			
	Other, specify							
	None of the above							
SAM 02.3	Indicate the selection process and its ESG/RI components							
	☐ Review ESG/RI respo	□ Review ESG/RI responses to RfP, RfI, DDQ etc.						
	☐ Review responses to I Questionnaire (LP DDQ)	PRI's Limit	ed Partners' R	esponsible I	nvestment Du	e Diligence		
	☐ Review publicly availa	ble informa	ation on ESG/I	RI				
	□ Review assurance pro			d processes				
	□ Review PRI Transpare□ Request and discuss I							
	-		•		SG/RI theme	S		
	☐ Meetings with the potential shortlisted managers covering ESG/RI themes							
	☐ Site visits to potential managers' offices							
	☐ Site visits to potential☐ ☐ Other, specify	managers'	offices					
SAM 02.4	-			anisation set	or use any of	the following	ng:	
SAM 02.4	☐ Other, specify		does your org	et Asse	Asset	the following Asset class	Asset	
SAM 02.4	☐ Other, specify	managers	does your org	et Asse	Asset class	Asset class	Asset	
SAM 02.4	Other, specify When selecting external ESG performance	managers All ass	does your org Asse	et Asse 1 class	Asset class 3	Asset class 4	Asset class 5	
SAM 02.4	Other, specify When selecting external ESG performance development targets	Managers All ass	does your org	t Asse	Asset class 3	Asset class 4	Asset class 5	
SAM 02.4	Other, specify When selecting external ESG performance development targets ESG score	Managers All ass	does your org Assects Class	t Asse	Asset class 3	Asset class 4	Asset class 5	
SAM 02.4	Other, specify When selecting external ESG performance development targets ESG score ESG weight	All ass	does your org	t Asse	Asset class 3	Asset class 4	Asset class 5	
SAM 02.4	□ Other, specify When selecting external ESG performance development targets ESG score ESG weight Real economy targets	Managers All ass	does your org	Assect Assection class	Asset class 3	Asset class 4	Asset class 5	
SAM 02.4 SAM 02.5	□ Other, specify When selecting external ESG performance development targets ESG score ESG weight Real economy targets Other RI considerations	All ass	does your org	Assect Assection Class	Asset class 3	Asset class 4	Asset class 5	
	□ Other, specify When selecting external ESG performance development targets ESG score ESG weight Real economy targets Other RI considerations None of the above Describe how the ESG in	All ass	does your org	Assect Assection Class	Asset class 3	Asset class 4	Asset class 5	



SAM 02	EXPLANATORY NOTES
	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.
SAM 02	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 <u>Aligning Expectations: Guidance for asset owners on incorporating ESG factors into manager selection, appointment and monitoring by the PRI, February 2013.</u>
	To find out more on how your peers have responded on this practice, view our analysis and visualisation in the <u>asset owner interactive data report</u> available on the Data Portal and the PRI website.
	Selection documentation can include RFPs, RFI, DDQ and other questionnaires and selection surveys, Investment and Operational Due Diligence processes.
SAM 02.1	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.
	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.
SAM 02.2	'Assess the ESG definitions to be used' can also include discussions of the scope of what is understood with ESG and what it entails.
SAW 02.2	'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



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 <a href="https://example.com/here-new-manager-

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.

SAM 02.3

'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	**				



Three options or more selected	***				
Core Assessed					
SAM 02.2 – Strategy (a)					
"None of the above" selected	0				
One option selected	*				
Two options selected	**				
Three options or more selected	***				
Additional Assessed					
SAM 02.2 – ESG people/overs	ight (b)				
"None of the above" selected	0				
One option selected	*				
Two options selected	**				
Three options or more selected	***				
Core Assessed					
SAM 02.2 - Process/portfolio	construction/investment valuat	ion (c)			
"None of the above" selected	0				
One or two options selected	*				
Three or four options selected	**				
Five or more options selected	***				
Core Assessed					
SAM 02.3					
One option selected	*	"Other" will be accepted an option which counts towards your assessment			
Two or more options selected	**	"Other" will be accepted an option which counts towards your assessment			
Either "Meetings with the potential shortlisted managers" or "Site visits to potential managers offices" must be selected within the two or more options in total	***	"Other" will be accepted an option which counts towards your assessment			
Additional Assessed					



		SAM 02.4				
		"None of the above"	0			
		Any option selected	***			

DEFINITIONS	3
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.



 SAM 03
 Indicator status
 Purpose
 Principle

 ADDITIONAL ASSESSED
 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			٥	٥	٥	٥		
	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	٥	٥	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		



	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		٥	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 asses	s if the mana	ager's engag	ement appro	ach is effect	ive.	
	☐ Impact on investment ☐ Financial impact on ta ☐ Impact on ESG profile ☐ Evidence of changes ☐ Other, specify ☐ None of the above	rget compar of company n corporate	or the portfo	olio	es and imple	mentation ac	ctivities)
SAM 03.3	Describe how you asses	s if the mana	ager's voting	approach is	effective/app	oropriate	
	 □ 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
	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.
SAM 03	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 inves	PRI's <u>Crafting an investment strategy – a process guidance for asset owners</u> 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 <u>asset owner interactive data report</u> available on the Data Portal and the PRI website.



LOGIC							
SAM 03	[SAM 03] is applicable if you report requiring external managers to engage or vote in [OO 10.1]						
	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 appl						
SAM 03.1	The Fixed Income (SSA) column of table SAM 03.1 v Income (SSA)	vill apply if the abov	e apples to Fixed				
3AW 03.1	(and so on for the other Fixed Income types)						
	The voting section of this indicator is applicable if in the it was reported that for Listed Equity - voting row: "We behalf".						
SAM 03.2	This indicator is applicable if in the Organisational Ove either Listed Equity or Fixed Income: 'We require our e						
SAM 03.3	This indicator is applicable if in the Organisational Ove for Listed Equity - voting row: "We require our external						
ASSESSMI	ENT						
SAM 03	Maximum of twelve ★ per asset class (maximum of nii	ne ★ for Fixed Inco	me)				
Scored sub- indicator	SAM 03.1 – Indicate how your organisation typically practices in the majority of the manager selection proc						
	Indicator scoring methodology						
	Selected response	Level score	Further Details				
	Engagement						
	"None of the above" selected	0					
	One option selected	*					
	Two options selected	**					
	Three options or more selected	***					
	Proxy voting (not applicable for Fixed income – Striked income – corporate (non-financial) and Fixed	SA, Fixed income d income – securit	 corporate (financial), ised.) 				
	"None of the above" selected	0					
	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	s engagement appro	pach is effective				



	Indicator scoring methodology					
	Selected response	Level score	Further Details			
	"None of the above" selected	0				
	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	0				
	One option selected	*				
	Two options selected	**				
	Three options or more selected	***				

APPOINTMENT

SAM 04 Indicator status Purpose CORE ASSESSED/ADDITIONAL ASSESSED	Principle PRI 1
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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 ES	SG benchmarks				
	☐ Defines ESG objectives and/or E	SG related exclusions/rest	rictions			
	☐ Sets incentives and controls link	ed to the ESG objectives				
	☐ Requires reporting on ESG object	ctives				
	☐ Requires the investment manager to adhere to ESG guidelines, regulations, principles or standards					
	☐ Other, specify (1)					
	☐ Other, specify (2)					
	O 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 Reporting controls requirements					
	• All	☐ Standard benchmark		☐ Fee based	O Monthly	
	Applicable from SAM 03	☐ ESG benchmark, specify	incentive	O Quarterly		



	[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	O Bi-annually O Annually O 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 you	r 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 releve	ant to your organisation's a	ppointment processes of external manager	S.	

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.
	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.
SAM 04.2	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 <u>asset owner interactive data report</u> 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'.

LOGIC							
	The asset classes presented in SAM 04.2 will	be influenced by w	hich 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	[SAM 04.2] is triggered by SAM 04.1 if you seguidelines, regulations, principles or standards		ions (excluding "Other, specify" and/or Requires the investment manager to adhere to ESG				
ASSESSM	ENT						
	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	0					
	One option selected	*	'Other' will be accepted as an option which counts towards your assessment.				
	Two options selected	**					
	Three or four options selected	***					
	SAM 04.2						
	No example provided	0					
	Example provided	***					
	Additional Assessed		1				

SAM 04.3		
"None of the above" selected	0	
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		



SAM 05 Indicator status 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								
		AII 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	٥							
	How ESG materiality has been evaluated by the manager in the monitored period								
	Information on any ESG incidents					٥			
	Metrics on the real economy influence of the investments								
	PRI Transparency Reports					٥			
	PRI Assessment Reports								
	RI-promotion and engagement with the industry to enhance RI implementation								
	Changes to the oversight and								



	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 externation compliance/progress:	al managers,	does your o	rganisation set	any of the	following to	measure
	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 inform managers.	nation relevar	nt to your org	ganisation's mo	onitoring pro	cesses of e	xternal
	[OPTIONAL]						

SAM 05	EXPLANATORY NOTES					
	The indicator [SAM 5.2] is aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations.					
	or complying with minimum star	ndards. ESG we	ve; this could also be assurance requirements ight could for example capture the ESG trigger points for action when monitoring your			
	reasons for these variations (e.g. do class or the types of investment b	pes it reflect their contents in the second made?). ES of Conduct, your o	rting provided by your managers and on the contractual obligations? Is it a function of asset iG objectives linked to investment strategy - rganisation's investment strategy, investment y / governance documents.			
SAM 05	Investment restrictions and any con investment manager has invested of		ment decisions – this could mean checking if a non-consensus view.			
	what are their respective ESG scor	es and how has t	viewing what companies are in the portfolio, he ESG composition of the portfolio changed ude reviewing examples of turnover for the			
	Information on any ESG incidents – being sold due to ESG factors.	this could also inc	clude any examples of previously bought stock			
	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 manage	ers to undertake c	arbon 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 <u>asset owner interactive data report</u> 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.					
	You are encouraged to describe an	y varieties in your	monitoring methods here.			
SAM 05.3	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 11.2.	report 'Monitoring	for the relevant external asset class in OO			
ASSESSMEN	NT					
SAM 05	Indicator scoring methodology					
	Selected response	Level score	Further Details			
	Core Assessed					
	Core Assessed					



"None of the above" selected	0			
One or two options selected	*	If both "PRI Transparency Reports" and		
Three or four options selected	**	"PRI Assessment Reports" are selected, they will be counted as one selection (not		
Five or more options selected	***	two).		
Additional Assessed				
SAM 05.2				
"None of the above" selected	0			
One or more options selected	***			





SAM 06

(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]				



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) **SAM 06.1** (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** Maximum of six ★ per asset class **SAM 06** Indicator scoring methodology Selected response Level score **Further Details Engagement** "None of the above" selected 0 One option selected Two options selected ** $\star\star\star$ Three options selected Proxy voting (not applicable for Fixed income - SSA, Fixed income - corporate (financial), Fixed income – corporate (non-financial) and Fixed income – securitised.) 0 "None of the above" selected One option selected Two options selected



Three options selected

	Indicator status	Purpose	Principle
SAM 07	MANDATORY	CORE ASSESSED	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.			
			O Of the total number of ballot items on which they could have issued instructions			
	%			the total number could have voted	of company meetings at which	
				O Of the total value of your listed equity holdings on which they could have voted		
	☐ We do not collect this informa	ition.				
SAM 07.2	Indicator status	Purpose			Principle	
	VOLUNTARY	DESCF	RIPTIVE		PRI 2	
		ne listed equities for which you have given your external managers a mandate to engage on pehalf, indicate the approximate percentage (+/- 5%) of companies that were engaged with g the reporting year.				
	Number of companies engaged					
	Proportion (to the nearest 5%)			%		
SAM 07.3	Additional information [OPTIONAL]					
	[OI HOWAL]					



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.					
	Variations in reporting					
	You may wish to comment on variations in the and on the reasons for these variations.	reporting provide	ed by your investment managers			
	You may wish to comment on a variety of reasons why managers choose not to vote					
	strategic decision not to vote on certain	types of assets	or funds;			
	operational or timing constraints;					
SAM 07.3	share-blocking;					
	conflicts of interest;					
	administrative impediments (e.g. power)	r of attorney requ	irements);			
	voting fees;					
	geographical restrictions (non-home m	arket);				
	 insufficient information; and/or 					
	overall cost effectiveness.					
LOGIC						
	[SAM 07] is applicable if you selected "Report oundertaken" in [SAM 06]	n voting undertal	cen" or "Report on engagements			
SAM 07	[SAM 07.1] is triggered if, in [SAM 06.1] you sele and examples)"	cted "Report on v	oting undertaken (with outcomes			
	[SAM 07.2] is triggered if, in [SAM 06.1] you selected 'Report on engagements undertaken (summary with metrics, themes, issues, sectors or similar)'					
ASSESSME	ENT					
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% or less reported					
	>10 to 80% reported	*				
	>80 to 95% reported	**				
	>95% reported	***				



SECTION

Outputs and outcomes

SAM 08	Indicator status MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	Purpose DESCRIPTIVE	Principle PRI 1
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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	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 <u>asset owner interactive data report</u> available on the Data Portal and the PRI website.



SAM 09	INDICATOR					
SAM 09.1		oles of how ESG factors I				
	Topic or issue				Outcomes	
		Internal staffInvestment 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 info	rmation.				

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 01.1 and OO 11.2	will be influenced by which asset of	classes you reported in OO SAM		
ASSESSME	ENT				
SAM 09.1	Indicator scoring methodolog	ју			
	Selected response Level score Further Details				
	No example provided •				
	Example provided	***			



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.

