



PRI REPORTING FRAMEWORK 2018 Closing Module

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Understanding this document

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

Top bar

Key information about each indicator is highlighted in the top bar, including the indicator status (mandatory or voluntary), 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 TO REPORT VOLUNTARY TO DISCLOSE VOLUNTARY

Mandatory indicators reflect core practices. These responses will be made public and must be completed to submit the framework.

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 indicators reflect alternative or advanced practices. These indicators are voluntary to report and disclose.

Purpose

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Gateway	2	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 xxx 01.2	This provides guidance on how to interpret the sub-indicators, including examples of what could be reported.
LOGIC	
ххх 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

CM 01: Indicate what data verification processes, if any, your report has undergone

CM 02: To what extent has the Reporting Framework captured your implementation of the Principles

CM 03: Suggestions or comments on the Reporting and Assessment process

CM 04: Reporting & Assessment contact

CM 05: Final review before submission

CM 06: Submit your responses



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

2017 Indicator	Update summary
CM 01 - 04	Sub-indicators have been amended, removed and/or renumbered, and selection options have been added

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



Assurance

	Indicator status	Purpose	Principle
CM 01	MANDARTORY	ADDITIONALLY ASSESSED	GENERAL

CM 01	INDICATOR
CM 01.1	Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:
	□ Independent assurance by a third party over selected responses from this year's PRI Transparency Report □ Independent assurance by a third party over data points from other sources that have subsequently been used in your PRI responses this year □ Third party assurance or audit of the implementation of RI processes (that have been reported to the PRI this year) □ Internal audit conducted by internal auditors of the implementation of RI processes and/or RI data (that have been reported to the PRI this year) □ Internal verification and/or audit 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	We plan to assure this year's PRI Transparency report O Whole PRI Transparency Report will be assured O Selected data will be assured O We do not plan to assure this year's PRI Transparency report

	We undertook third party assurance on last year's PRI Transparency Report
CM 01.3	O Whole PRI Transparency Report was assured last year
	O Selected data was assured in last year's PRI Transparency Report
	O We did not assure last year's PRI Transparency report
CM 01.4	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

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 CM 01.5 that have subsequently been used in your PRI responses this year Level of Link to Who has What data has been Link to original conducted the Assurance standard used auditor's data source (if ☐ ISAE/ ASEA 3000 ☐ ISAE 3402 ☐ Financial and organisational data ☐ ISO standard. [Checkbox of specify____ ■ Data related to RI modules] activities □ AAF01/06 ☐ RI Policies ☐ AA1000AS Organisationa O Limited or **I** Overview equivalent ☐ RI Processes (e.g. ☐ IFC performance engagement ■ Module 2 standards **O**Reasonable process) or equivalent ☐ ASAE 3410 Assurance ☐ Module 3 ■ ESG operational Engagements on etc data of the portfolio Greenhouse Gas Statements. Other, specify ■ National standard, specify____ Other, specify 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 CM 01.6 related processes (that have been reported to the PRI this year) Who has Level of the process Assurance standard

	 □ 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 □ Manager monitoring process for externally managed □ Third party property manager SAM process □ Third party infrastructure operator SAM process □ ESG incorporation in selection process for private education process for privat	ed assets assets quity investments				of Internal ISAE 3- ISO, sp AAF 01 SSE18 AT 101 financial d	for the hal Practice Auditing 402 ecify/06 (excluding	O Limited or equivalent O Reasonable or equivalent
CM 01.7	Indicate who has reviewed/verified internally the whole data was reviewed.	- or selected data c	of the - PRI Transp	parency Repor	t and if this applies	s to selected	data please s	pecify what
	Who has conducted the verification	What data has b	een verified	Relevant m	odules		Correspone number	ding Indicator
	□CEO or other Chief-Level staff □ Sign-off	Each row has the options:	following	Each row sh completed:	nows checkboxes	of modules		

	☐ Review of	f all the responses		□ Policies		Organisation	al Overview		
	☐ The Board ☐ Sign-off ☐ Review of ☐ Investment Com ☐ Sign-off	f all the responses mittee f all the responses ction		 □ Policies □ Overarching strategy and processes □ Asset class specific processes, □ Quantitative data related to RI processes, □ Other, specify [text] 		☐ Module 2 ☐ Module 3 etc			
CM 01.8	Provide details re Expected date the assurance will be complete [date]	What data will be assured Financial and organisational data Data related to RI activities RI policies RI processes (e.g. engagement process)	Relev	ox of modules] anisational ew dule 2	for the whole – or s Corresponding Indicator number	Who will conduct the assurance	Assurance standard to ISAE/ ASEA 3000 ISAE 3402 ISO standard, specify AAF01/06 AA1000AS IFC performance stan	be used	Level of assurance sought O Limited or equivalent OReasonable or equivalent

	C	☐ ESG operational data of the portfolio ☐ Other, specify	rolated to the whol	le or colocted data	Engagemer Gas Statem National Other, sp	standard, specify pecify	_
CM 01.9	What data has been assured	Relevant modules	Corresponding Indicator number	Who has conducted the assurance	from last year's PRI Transpar Assurance standard used	Level of assurance sought	Link to auditor'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	O Limited or equivalent OReasonable or equivalent	[URL]

CM 01.10	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]	
	☐ Climate label, specify	[same as above]	
	□ RIAA	[same as above]	
	☐ Other, specify [same as above]		
CM 01.11	Provide a link to the public report (such as a sustainability report that you carry of PRI Transparency Report. Also include a link to the auditor's report.	out third party assurance over and for which you have used extracts of in this year's	
	Link to sustainability/RI/integrated report	Link to auditor's report	
	[url]	[url]	

CM 01.12	Describe the process of external/third party ESG audit of holdings, including which data has been assured.			
	Description of process (including what data has been assured)			
CM 01.13	Additional Information			
	[OPTIONAL]			

CM 01	EXPLANATORY NOTES
CM 01.1	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 <a href="mailto:this:reporting.com/t</td></tr><tr><td></td><td>Please select 'Independent assurance by a third party 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.</td></tr><tr><td></td><td>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</td></tr><tr><td>CM 01.2</td><td>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.</td></tr><tr><td>CM 01.3</td><td>Please select respective answer option if you undertook independent assurance by a third party which was specific to last year's PRI Transparency Report.</td></tr><tr><td>CM 01.4</td><td>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.</td></tr><tr><td></td><td colspan=3>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.</td></tr><tr><td></td><td>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.
CM 01.5	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: such data include assets under management, asset allocation and number of staff
	 ESG operational data of the portfolio: this can be the case for physical assets such as infrastructure, property, farmland, forestry, agriculture and inclusive finance
	 RI data related to RI activities: these relate to 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.

CM 01.18

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

[CM 01.5] will be applicable if 'Independent assurance by a third party over selected responses from this year's PRI Transparency Report' or if 'Independent assurance by a third party over data points from other sources that have subsequently been used in your PRI responses this year.' is reported in [CM 01.1] [01.7] will be applicable if 'Independent process assurance by a third party (specific to assurance of RI processes that have been reported to the PRI this year)' is reported in [01.1]

[CM 01.6] will be applicable if 'Third party assurance or audit of the implementation of RI processes ' or 'Internal process assurance conducted by internal auditors' is reported in [CM 01.1]

[CM 01.7] will be applicable if 'Whole PRI Transparency Report has been internally verified' or if 'Selected data has been internally verified' is reported in [CM 01.1]

[CM 01.8] will be applicable if 'Whole PRI Transparency Report will be assured' or if 'Selected data will be assured' is reported in [CM 01.2]01.13] will be applicable if 'Whole PRI Transparency Report was assured last year' is reported in [01.3]

[CM 01.9] will be applicable if 'Selected data was assured in last year's PRI Transparency Report' or if 'Whole PRI Transparency Report was assured last year' is reported in [CM 01.3]

[CM 01.10] will be applicable if 'We adhere to an RI certification or labelling scheme' is reported in [CM 01.4]

[CM 01.11] will be applicable if 'We carry out independent/third party assurance over a whole public report (such as a sustainability report) e01tracts of which are included in this year's PRI Transparency Report' is reported in [CM 01.4]

[CM 01.12] will be applicable if 'External/third party ESG audit of holdings' is reported in [CM 01.4]

EXAMPLE

Selected data on staff training was assured as part of a CSR report. This data point from the CSR report has been included in the response to the PRI Reporting Framework.

Internal process assurance was undertaken in January 2016 on the processes in place for identifying and prioritising engagement activities.

Selections in CM 01.1

- □ Independent assurance by a third party over data points from other sources that have subsequently been used in your PRI responses this year
- □ Internal process assurance conducted by internal auditors (specific to assurance of RI processes that have been reported to the PRI this year)

Relevant sub-indicator CM 01.6:

What data has been assured	Corresponding Indicator number	Who has conducted the assurance	Assurance standard used	Level of assurance sought	Link to original data source	Link to auditor's report
Staff training on RI	SG 07	KMPG	AA1000	Limited	www.x.com	www.y.com



Relevant sub-indicator CM 01.8:

What RI processes have been assured	Corresponding Indicator number	When was the process assurance undertaken (year/month)	Assurance standard used	Describe the outcomes of this process
Process for identifying and prioritising engagements	LEA 03	January 2016	The IIA's International Standards for the Professional Practice of Internal Auditing (Standards)	It was identified that we could have stronger processes in place for monitoring the outcomes of the engagements. In 2016 we will be implementing a new process to capture this information

CM 01	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 Leve		Level score	Further Details
	"None of the above" or "Other" selected in CM 01.1	0	
	One option selected from CM 01.1	**	
	Two options selected from CM 01.1	***	

CM 01	DEFINITIONS
Independent assurance by a third party	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 audit or assurance of the correct implementation of RI processes	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 of the	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).	
Internal audit of the correct implementation of the RI process and/or accuracy of RI data	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 .	
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.	
	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.	
Level of Assurance Sought	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	
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).	



Feedback

CM 02	Indicator status VOLUNTARY TO REPORT	Purpose DESCRIPTIVE	Principle GENERAL
	NOT DISCLOSED		

CM 02	INDICATOR				
CM 02.1	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	O	O	O	O
CM 02.2	Additional information. [OPTIONAL]				

CM 03	Indicator status VOLUNTARY TO REPORT	Purpose DESCRIPTIVE	Principle GENERAL
	NOT DISCLOSED		

CM 03	INDICATOR
CM 03.1	If you have any additional suggestions or comments on the Reporting and Assessment process, share them here. [OPTIONAL]

CM 03	EXPLANATORY NOTES
CM 03	Your response will support efforts to improve the PRI reporting and assessment process.

Contact details

CM 04	Indicator status MANDATORY TO REPORT NOT DISCLOSED	Purpose DESCRIPTIVE	Principle GENERAL
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CM 04	INDICATOR			
CM 04.1	Provide a primary and secondary contact person.			
		First name	Surname	Email address
	Primary contact			
	Secondary contact [OPTIONAL]			
	Data Portal contact 1			
	Data Portal contact 2			

CM 04	EXPLANATORY NOTES	
CM 04	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 04	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(s) have the authority to grant other signatories access to their signatory's full transparency and assessment report organisation. This person should be approved by the senior management team of their organisation.



Final review and submission

CM 05	Indicator status MANDATORY TO REPORT	Purpose DESCRIPTIVE	Principle GENERAL
	NOT DISCLOSED		

CM 05	INDICATOR	
CM 05.1	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 05.2	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 2017).	
	☐ I do not give the PRI permissions to publish it (only applicable if you are in your preparation year).	

CM 05	EXPLANATORY NOTES		
LOGIC			
CM 05.2	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).		
ASSESSMI	ASSESSMENT		
CM 05	Signatories will be able to opt-out of receiving their assessment report. Even when you opt-out of receiving your report, the responses will still be assessed and these scores will still be used in an aggregated, confidential form to enable peer comparison for other signatories who have requested an assessment report.		

