

PRI REPORTING FRAMEWORK 2019 Strategy and Governance

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Changing finance, financing change

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 | | |
| VOLUNTARY TO DISCLOSE VOLUNTARY | indicators may determine which subsequent indicators are applicable or are used for peering, but they may also contain commercially sensitive information. Voluntary indicators reflect alternative or advanced practices. These indicators | |

| Purpose | | |
|---------------------|------------|---|
| Gateway | 9 | 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. |

Underneath the indicator

Descriptive

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.

Open-ended narrative indicators that allow you to describe your activities.

| xxx 01 | EXPLANATORY NOTES | |
|---|--|--|
| xxx 01.1 | This provides guidance on how to interpret the sub-indicators, including examples of | |
| xxx 01.2 | what could be reported. | |
| LOGIC | | |
| 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. |

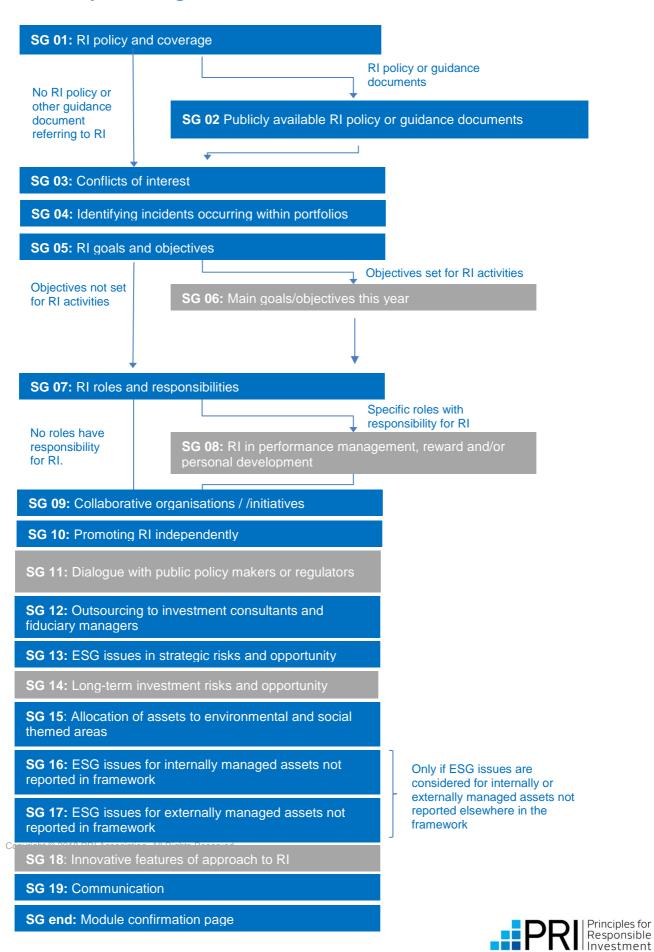


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Pathways through the module



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 <u>here</u>.

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



Investment Policy

| SG 01 | Indicator status MANDATORY | Purpose CORE ASSESSE | :D | Principle GENERAL |
|---------|--|---|---|----------------------|
| SG 01 | INDICATOR | | | |
| SG 01.1 | Indicate if you have an investment policy that covers your responsible investment approach | | | t approach. |
| | O Yes | | 01 | No |
| | Indicate the components/types and cov | erage of your policy | | |
| SG 01.2 | Policy components/types | | Coverage by AUM | Л |
| | □ Policy setting out your overall approa □ Formalised guidelines on environme □ Formalised guidelines on social factor □ Formalised guidelines on corporate of | ntal factors ors | Applicable policAUMApplicable polic | |
| | □ 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) | | majority of AUM Applicable police Minority of AUM | ies cover a |
| SG 01.3 | Indicate if the investment policy covers | any of the following: | | |
| | □ Your organisation's definition of ESG investments □ Your investment objectives that take □ Time horizon of your investment □ Governance structure of organisation □ ESG incorporation approaches □ Active ownership approaches □ Reporting □ Climate change □ Understanding and incorporating clies □ Other RI considerations, specify (1) | ESG factors/real econnal ESG responsibilities | nomy influence into | |



| | ☐ 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] |
| | |
| | Additional information |
| SG 01.6 | [OPTIONAL] |
| | |

| SG 01 | EXPLANATORY NOTES |
|---------|---|
| | The indicators [SG 01.1] & [SG 01.5] are aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations. |
| SG 01 | 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. |
| | '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. |
| SG 01.1 | 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. |
| | Total application to reporting, moldaring level of publicity and mental review processes. |



| | 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 hereby-be-referred to as an 'RI Policy'. For more guidance on how to write a RI policy, click hereby-be-referred to as an 'RI Policy'. For more |
|---------|---|
| | 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. |
| 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. |
| | 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). |
| SG 01.3 | 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 <u>Crafting an Investment Strategy – A Process Guidance</u> <u>for Asset Owners</u> that can provide additional support to asset owners in the development of a clear and explicit investment strategy. |



| | 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. | | | |
| | 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, | | | |
| SG 01.4 | 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. | | | |
| | 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; | | | |
| SG 01.5 | to uphold values or ethical standards or to promote compliance with internationa 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] | | | |
| ASSESSMEN | NT | | | |
| 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 | | | |



| No RI policy | 0 | |
|--|-----|---|
| 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. |

| | Indicator status | Purpose | Principle |
|-------|------------------|---------------|-----------|
| SG 02 | MANDATORY | CORE ASSESSED | PRI 6 |

| SG 02 | MANDATORY CORE | | E ASSESSED | | 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 [C | 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 investme policy documents | ent | | | |
| SG 02.2 Indicate if any of your investment policy components are publicly attachment of the document | | | its are publicly av | /ailable. Provide | a URL and an |
| | Policy components | | URL | Attachment [C | OPTIONAL] |
| | ☐ Your organisation's definition of ESG an responsible investment and its relation to investments | d/or | | | |
| | ☐ Your investment objectives that take ES factors/real economy influence into accoun | | | | |
| | ☐ Time horizon of your investment | | | | |
| | ☐ Governance structure of organisational Eresponsibilities | ESG | | | |
| | ☐ ESG incorporation approaches | | | | |



| | ☐ 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 | | | |
|----------|---|--|--|--|
| | The indicator [SG 02.1] is aligned with the OECD Responsible Business Conduct fo Institutional Investors recommendations. | | | |
| SG 02 | 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. | | | |
| 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]. | | | |
| ASSESSMI | ENT | | | |
| SG 02 | Maximum score: Three ★ | | | |
| 36 02 | 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 ★★★ | | | |



| SG 03 | Indicator status MANDATORY | Purpose CORE ASSESSED | | Principle GENERAL | |
|---------|---|---------------------------|---------|--------------------------------------|--|
| SG 03 | INDICATOR | | | | |
| SG 03.1 | Indicate if your organisat investment process. | ion has a policy on manag | ging po | tential conflicts of interest in the | |
| | O Yes O 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 | | | | |
|----------|---|-------------------------|--|--|--|
| | 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 i perceived to be the same as, that of your own organisation. This may relate to either investment management business or other parts of the business. | | | | |
| SG 03 | 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] | | | | |
| ASSESSME | ENT | | | | |
| 00.00 | Maximum score: Three ★ | | | | |
| SG 03 | The assessment of this indicator is based on your responses to [SG 03.1]. | | | | |
| | Indicator scoring methodology | | | | |
| | Selected response Level score | | | | |
| | 'No' | | | | |
| | 'Yes' | *** | | | |



| | Indicator status | Purpose | Principle |
|-------|------------------|-------------|-----------|
| SG 04 | VOLUNTARY | DESCRIPTIVE | GENERAL |

| SG 04 | INDICATOR | | | |
|---------|---|------|--|--|
| SG 04.1 | Indicate if your organisation has a process for identifying and managing incidents that occur within portfolio companies. | | | |
| | O Yes | O 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. |

Objectives and strategies

| SG 05 | Indicator status MANDATOF | Purpose GATEWAY/CORE ASSESSED | | | Principle GENERAL | |
|---------|------------------------------------|--------------------------------|----------------------------|---------------------------------------|----------------------|--------------------|
| SG 05 | INDICATOR | | | | | |
| | Indicate if and investment ac | | your organisation | n sets and reviews o | bjectives fo | or its responsible |
| SG 05.1 | O Quarterly or more frequently | O Biannually | Annually | O Less frequently than annually | O Ad-ho basis | |
| SG 05.2 | Additional information. [OPTIONAL] | | | | , | |
| | | | | | | |

| SG 05 | EXPLANATORY NOTES | | |
|----------|---|------------------------------|--|
| 00.05 | For examples of possible objectives, please see the guidance notes for indicator [07], which allows you to describe your objectives in more detail. | | |
| SG 05 | 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 review | ed' is selected in [SG 05.1] | |
| ASSESSME | ASSESSMENT | | |
| SG 05 | Maximum score: Three ★ | | |
| 30 03 | 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' | 0 | |
| | 'Ad-hoc basis' or 'Less frequently than annually' | ** | |
| | 'Annually', 'Biannually', or 'Quarterly or more frequently' | *** | |



SG 06



| | | ☐ 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 | | |
| | Additional information | ation. | | |
| SG 06.2 | [OPTIONAL] | | | |
| | | | | |

| SG 06 | EXPLANATORY NOTES |
|-------|---|
| | 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 |
| SG 06 | 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 |



Governance and human resources

| | Indicator status | Purpose | Principle |
|-------|------------------|---------------|-----------|
| SG 07 | MANDATORY | CORE ASSESSED | GENERAL |

| SG 07 | INDICATOR | | | | |
|---------|---|--|-------------------------------------|----------------------|--------------------------|
| | 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 | | 0 | | |
| SG 07.1 | | Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee | | | |
| | Internal roles | Other chief-level staff or head of department, specify | | | |
| | | ☐ Portfolio managers | | | |
| | | ☐ Investment analysts | | | |
| | | ☐ Dedicated responsible investment staff | | | |
| | | ☐ Investor relations | | | |
| | | Other role, | | | |
| | | Other role, | 0 | | 0 |
| | | External managers or vice providers | | | |



| 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 |
|-------|--|
| | 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. |
| SG 07 | 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. |



| LOGIC | | | |
|---|--|-------------|--|
| If you report here that individuals within your organisation have oversight/accountability implementation roles in relation to responsible investment, the parts of indicator [07.1] to these roles will be applicable. | | | |
| | The roles you select in SG 07.1 will appear in SG 08.1 | | |
| ASSESSM | ENT | | |
| | Maximum score: Three ★ | | |
| SG 07 | 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 | 0 | |
| | 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). |



| SG 08 | INDICATOR | | | |
|---------|---|--|---|--|
| | Indicate if your organisation's performance management, reward and/or personal development processes have a responsible investment element. | | | |
| SG 08.1 | 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 | ☐ RI KPIs / goals in objectives | | |
| | Officer (CIO), Chief | ☐ RI included in appraisal process | [same as above] | |
| | Operating Officer (COO), Investment | ☐ Variable pay linked to RI performance | | |
| | Committee | ☐ None of the 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. | | and maintain board | |
| 000012 | | | | |
| SG 08.3 | | ermation on your organisation's performance ent processes in relation to responsible inves | | |



| 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 | |
|----------|--|--|
| | 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. | |
| SG 08 | 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 | | |
| | 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 | [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 | |
| ASSESSME | NT | |
| | Maximum score: Six ★ | |
| | This indicator assesses two parts of [08.1] separately. | |
| SG 08 | 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 | |



| | Selected response | Level score | Further Details | |
|--|--|-------------|---|--|
| | Responsible investment included in objectives, appraisal and/or reward (SG 08.1a) | | | |
| | 'None of the above' | 0 | | |
| | 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 | 0 | | |
| | 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 | |

Promoting responsible investment

| SG 09 | Indicator status MANDATORY | Purpose CORE ASS | SESSED | 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. | | | is a member or in |
| | Collaborative Organisation/ Initiative | ative Organisation/ Initiative | | 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 Associa | tion | [same as above] | |
| | ☐ Australian Council of Superannuation | Investors | [same as above] | |
| | □ AFIC—La Commission ESG □ BVCA—Responsible Investment Advisory Board | | [same as above] | |
| | | | [same as above] | |
| | □ CDP Climate Change | | [same as above] | |
| | □ CDP Forest | | [same as above] | |
| | □ CDP Water | | [same as above] | |
| | ☐ CFA Institute Centre for Financial Mar | CFA Institute Centre for Financial Market Integrity | | |
| | ☐ Code for Responsible Investment in S | A (CRISA) | [same as above] | |
| | ☐ Code for Responsible Finance in the 2 | 1st 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] |
|--|-----------------|
| ☐ 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] |

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

| SG 09 | EXPLANATORY NOTES | | | |
|--|--|-------------|---------------------------|--|
| | The indicator [SG 9.1] is aligned Institutional Investors recomme | | ible Business Conduct for | |
| | The option 'Principles for Responsible Investment' has been prefilled for all signatories. | | | |
| You can also add organisations or initiatives that are not listed. | | | d. | |
| SG 09 | 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 | SSMENT | | | |
| | Maximum score: Three ★ | | | |
| SG 09 | 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 | 0 | | |
| | Basic role in any initiative ★ In addition to PRI | | In addition to PRI | |
| | Moderate role in any initiative ★★ In addition to PRI | | In addition to PRI | |
| | Advanced role in any initiative *** In addition to PRI | | | |



| 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: | |
| 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. | |

| | Indicator status | Purpose | Principle |
|-------|------------------|---------------|-----------|
| SG 10 | MANDATORY | CORE ASSESSED | PRI 4 |

| SG 10 | INDICATOR | | |
|---------|---|--------------------------|--|
| SG 10.1 | Indicate if your organisation promotes responsible investment independently of collaborative initiatives. | | |
| | O Yes | | O No |
| | Indicate the actions your organisation has taken to of collaborative initiatives. Provide a description of yellocted action and the typical frequency of your page 1. | our role in contributing | g to the objectives of the |
| | Action to promote responsible investment | Description | Frequency of contribution |
| SG 10.2 | □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 |



| 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 | | |
|--|--|--------------------------------|--|
| Describe your role in the action taken to promote responsible investment. you spoke at, describe the education and to whom it was provided, provider research funded and published, explain how you encouraged better disclo | | ed, provide information on the | |
| | 'Frequency of contribution' might for instance be how often you advisory committees, e.g. through meetings or through feedbac | | |
| SG 10.3 | The information that you provide here may also include additional actions and initiatives that 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. | | |
| 36 10.3 | You may wish to provide an URL/website link for an overview of initiatives that your organisation has taken part in. | your various actions and | |
| | 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 | LOGIC | | |
| SG 10 | [SG 10.2] will be applicable if 'Yes' is reported in [SG 10.1] | | |
| ASSESSME | ASSESSMENT | | |
| Maximum score: Three ★ | | | |
| SG 10 | 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' | 0 | |
| | 'Yes' and two actions or fewer | ** | |
| | 'Yes' and more than two actions | | |

| | Indicator status | Purpose | Principle |
|-------|------------------|---------------------|-----------|
| SG 11 | VOLUNTARY | ADDITIONAL ASSESSED | 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 co | laboration with other | s |
| | □ No | | |
| | Please explain w | hy not | |
| | Select the methods you have used. | | |
| 20.44.2 | ☐ Endorsed written submissions to governments, regulators or public policy-makers developed by others | | |
| SG 11.2 | ☐ 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 | | URL(s) |
| | | | |
| | O Yes | O No | |
| | | | |
| SG 11.4 | Provide a brief description of the main topics your organisation has engaged with public policy-makers or regulators on. | | pics your organisation has engaged with public policy- |
| | | | |

| SG 11 | EXPLANATORY NOTES |
|---------|--|
| | The indicator [SG 11.1] is aligned with the ICGN Global Stewardship Principles. |
| SG 11 | 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 |



| | 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 | Г | | | | |
| | Maximum score: Three ★ | | | | |
| SG 11 | 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' | 0 | | | |
| | 'Yes' | *** | To get three ★ signatories must also respond to at least one part of 11.2, 11.3 or 11.4 | | |

Outsourcing to fiduciary managers and investment consultants

| SG 12 | Indicator status | | Purpose | Purpose | | | Principle | | | |
|---------|--|--------------------------|--------------------------|--------------------------------------|---|----------------------------|---------------------------|-------------------------|------------------|---------------------------|
| | MANDATORY | | | CORE AS | CORE ASSESSED | | PRI 4 | 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. | ٥ | | | ٥ | ٥ | | ٥ | | |
| | ☐ We use investment consultants in our monitoring of external managers. | | | | 0 | | | ٥ | | |
| | O We do not use investment consultants for selection, appointment and monitoring of external managers. | | | | | | | | | |



| 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 | | | | | |
| | O 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) | | | | | |
| | O 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 | | | | | |





| | □ 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 |
| | O 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] |
| | |



| 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. | | | |
| | 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. | | | |
| SG 12.2 | 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 <u>asset owner interactive data report</u> 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 processe 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 05.2 | | | |
| ASSESSMENT | | | | |



| | 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) | | | | | |
| SG 12 | 'We do not consider responsible investment in the selection, appointment and/or review processes for investment consultants in SG 12.3 | 0 | | | | |
| | 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. | 0 | | | | |
| | '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. |



ESG issues in asset allocation

| SG 13 | Indicator status MANDATORY | Purpose DESCRIPTIVE | Principle PRI 1 |
|---------|---|------------------------|--------------------|
| SG 13 | INDICATOR | | |
| | Indicate whether your organisation of provide a description of the scenario etc.). | | |
| SG 13.1 | Yes, in order to assess futDescribe [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 |
|---------|---|
| | 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. |
| SG 13.1 | 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. 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. |
|---------|---|
| | |
| | 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. |
| SG 13.2 | 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 <u>asset owner interactive data report</u> 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. |

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

| 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 |



| | | 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 | | elected disclosure on emissions risks, please list any specific climate related disclosure frameworks that you used. |
| | | |
| SC 44 F | Addition | al information. |
| SG 14.5 | [OPTIOI | NAL] |
| | | |

| 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. |
| 332 | To find out more on how your peers have responded on this practice, view our analysis and visualisation in the <u>climate change interactive snapshot report</u> 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 14.2] and [SG 14.3] will be applicable if 'Climate change' is reported in [SG 14.1] |
| SG 14 | [SG 14.4] will be applicable if you report 'Disclosure on emissions risk to clients/trustees/management/beneficiaries' in [SG 14.3]. |
| ASSESSME | ENT |



| 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 | 0 | |
| | 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 |

| SG 15 | Indicator status MANDATORY TO REPORT VOLUNTARY TO DISCLOSE | Purpose DESCRIPTIVE | Principle PRI 1 |
|-------|--|------------------------|--------------------|
| | | | |
| CC 45 | INDICATOR | | |

| SG 15.1 Indicate whether your organisation allocates assets to, or manages, funds based on specific environmental and social themed areas. O Yes O No Indicate the percentage of your total AUM invested in environmental and social themed areas. Second 15.2 Specify which thematic area(s) you invest in, indicate the percentage of your AUM in the particular asset class and provide a brief description. Asset class invested (pre-percentage of AUM per asset class are description. | SG 15 | INDICATOR | | | |
|---|---------|------------------------------|----------------------------------|------------------------------|--------------------------|
| scription Area 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 Specify which thematic area(s) you invest in, indicate the percentage of your AUM in the particular asset class and provide a brief description. Asset class invested (prepopulated from OO 05) Asset class 1 Asset class 1 Asset class 2 Asset class 3 Asset class 3 Asset class 3 Asset class 4 Asset class 4 Asset class 5 Energy efficiency / Asset class 5 | 30 13 | | | | |
| Indicate the percentage of your total AUM invested in environmental and social themed areas. Sec. 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. Asset class invested (prepopulated from OO 05) Asset class 1 Brief description and measures of invested in the area of investment Asset class 2 W of AUM Asset class 2 W of AUM Asset class 3 W of AUM Asset class 4 W of AUM Asset class 5 Asset class 5 W of AUM Asset class 6 W of AUM Asset class 7 W of AUM Asset class 8 W of AUM Asset class 9 W of AUM Asset class 9 | SG 15.1 | | | s to, or manages, funds base | d on specific |
| SG 15.2 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 Area Percentage of AUM per asset class invested (prepopulated from OO 05) Asset class 1 Asset class 1 Asset class 2 Asset class 2 Asset class 3 Asset class 3 Asset class 3 Asset class 4 Asset class 4 Asset class 5 | | O Yes | 3 | O No | |
| Specify which thematic area(s) you invest in, indicate the percentage of your AUM in the particular asset class and provide a brief description. Asset class invested (prepopulated from OO 05) Asset class 1 Asset class 1 Asset class 1 Asset class 1 Asset class 2 Asset class 2 Asset class 3 Asset class 3 Asset class 3 Asset class 4 Asset class 4 Asset class 5 | SG 15.2 | Indicate the percentage of y | our total AUM invested | in environmental and social | themed areas. |
| Area Asset class invested (prepopulated from OO 05) Asset class 1 | | | | % | |
| Area invested (prepopulated from OO 05) Asset class 1 Asset class 2 Asset class 3 Asset class 3 Asset class 3 Energy efficiency / Asset class 5 | SG 15.3 | | | | JM in the |
| Asset class 2 % of AUM Asset class 3 % of AUM Asset class 4 % of AUM Asset class 4 % of AUM Asset class 5 | | Area | invested (pre- populated from | per asset class | description and measures |
| Asset class 3 % of AUM Asset class 4 % of AUM Asset class 5 % of AUM | | | ☐ Asset class 1 | % of AUM | |
| Asset class 4 % of AUM % of AUM % of AUM % of AUM | | | ☐ Asset class 2 | % of AUM | |
| □ Asset class 4 % of AUM □ Energy efficiency / □ Asset class 5 | | | ☐ Asset class 3 | % of AUM | |
| 3 = 110.9) · 110.010.0) / | | | ☐ Asset class 4 | | |
| | | | ☐ Asset class 5 | % of AUM | |
| □ Asset class 6 % of AUM | | Great teermonegy | ☐ Asset class 6 | % of AUM | |
| □ Asset class 7 % of AUM | | | ☐ Asset class 7 | % of AUM | |
| □ Asset class 8 % of AUM | | | ☐ Asset class 8 | | |
| □ Asset class 9 % of AUM | | | ☐ Asset class 9 | % of AUM | |
| □ Asset class 10 % of AUM | | | ☐ Asset class 10 | % of AUM | |
| □ Asset class 11 % of AUM | | | ☐ Asset class 11 | % of AUM | |
| □ Asset class 12 % of AUM | | | ☐ Asset class 12 | | |
| □ Asset class 13 | | | ☐ Asset class 13 | | |
| ☐ Renewable energy | | ☐ Renewable energy | | | |
| ☐ Green buildings | | ☐ Green buildings | | | |
| ☐ Sustainable forestry | | ☐ Sustainable forestry | | | |
| ☐ Sustainable agriculture | | ☐ Sustainable agriculture | | | |

| | ☐ 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 |
| | Please attach any supporting i | nformation you wish to include. |
| SG 15.4 | [OPTIONAL] | |
| | | |

| SG 15 | EXPLANATORY NOTES |
|-------|--|
| | 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. |
| SG 15 | 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 |

| SG 15 | DEFINITIONS |
|-----------------------------|---|
| Energy effic Clean techn | 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 |



| | 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/commun ity 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 |



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: <a href="https://www.who.acm.no.nih.gov/

Asset class implementation not reported in other modules

| SG 16 | Indicator status MANDATORY | Purpose DESCRIPTIVE | | Principle 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 proc place and the output achieved | | | |
| | Listed equities—ESG incorporatio | n | | |
| | Listed equities—engagement | | | |
| | Listed equities—(proxy) voting | | | |
| | Fixed income—SSA | | | |
| | Fixed income—Corporate (financia | al) | | |
| | Fixed income—Corporate (non-fin | ancial) | | |
| | Fixed income—Securitised | | | |
| | Private equity | | | |
| | Property | | | |
| | Infrastructure Commodities | | | |
| | | | | |
| | Hedge funds | | | whether you have responded to RI Hedge Fund DDQ |
| | Fund of hedge funds | | | whether you have responded to RI Hedge Fund DDQ |
| | Forestry | | | |
| | Farmland | | | |
| | Inclusive finance | | | |
| | Cash | | | |



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

| SG 16 | EXPLANATORY NOTES | | |
|-------------------|--|--|--|
| 00.40 | 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. | | |
| SG 16 | 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] 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: | | |
| SG 16 | 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]. | | |

| SG 17 | INDICATOR | | | |
|---------|---|------------------------------------|--|--|
| SG 17.1 | Describe how you address ESG issues for <u>externally managed</u> 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 | | at processes are in place and the utcomes achieved | |
| | Listed equities—ESG incorpora | tion | | |
| | Listed equities—engagement | | | |
| | Listed equities—(proxy) voting | | | |
| | Fixed income—SSA | | | |
| | Fixed income—Corporate (finar | ncial) | | |
| | Fixed income Corporate (non-fir | nancial) | | |
| | Fixed income—Securitised | | | |
| | Private equity | | | |
| | Property | | | |
| | Infrastructure | | | |
| | Commodities | | | |
| | Hedge funds | ○ Yes | er you use the PRI Hedge Fund DDQ | |
| | Fund of hedge funds | Select whether Hedge Fund Yes No | er you have responded to the PRI DDQ | |
| | Forestry | 3 140 | | |
| | Farmland | | | |
| | Inclusive finance | | | |
| | Cash | | | |
| | Money market instruments | | | |
| | Other (1) [from OO 05] | | | |
| | Other (2) [from OO 05] | | | |
| | l | | | |

| 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] 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: |
| SG 17 | 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]. |

Innovation

| SG 18 | Indicator status VOLUNTARY | Purpose DESC | RIPTIVE | Principle GENERAL |
|---------|---|------------------------|---------|--------------------|
| SG 18 | INDICATOR | | | |
| SG 18.1 | Indicate whether any specific features of your approach to responsible investment are particularly innovative. | | | |
| | O Yes | | 0 | No |
| SG 18.2 | Describe any specific features of your approach to responsible investment that you believe are particularly innovative. | | | |
| | | | | |

| SG 18 | EXPLANATORY NOTES | |
|-------|---|--|
| | 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; | |
| SG 18 | 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] | |

Communication

| SG 19 | Indicator status MANDATORY | Purpose CORE ASSESSED | Principle 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 | | | | |
| | O We do not disclose to either clients/beneficiaries | s or the public. | | | |
| | O We disclose to clients/beneficiaries only. | | | | |
| | O We disclose to the public | | | | |
| | The information disclosed to clients/beneficiaries is the same O Yes O No | | | | |
| | Disclosure to public and URL | Disclosure to clients/beneficiaries | | | |
| | O Broad approach to RI incorporation | O Broad approach to RI incorporation | | | |
| | O Detailed explanation of RI incorporation strategy used | O Detailed explanation of RI incorporation strategy used | | | |
| | [Dropdown] Quarterly, Biannually, Annually, Less frequently than annually, Ad hoc/when requested [Dropdown] Quarterly, Biannua Less frequently than annually, A requested | | | | |
| | URL | | | | |
| | URL | | | | |
| | Infrastructure | | | | |
| | ○ We do not disclose to either clients/beneficiaries or the public. | | | | |
| | O We disclose to clients/beneficiaries only. | | | | |
| | We disclose to the public | | | | |
| | The information disclosed to clients/beneficiaries is the same O Yes O No | | | | |
| | Disclosure to public and URL | Disclosure to clients/beneficiaries | | | |



| ☐ ESG information on how you select infrastructure investments | ☐ ESG information on how you select infrastructure investments | |
|---|---|--|
| ☐ ESG information on how you monitor and manage infrastructure investments | ☐ ESG information on how you monitor and manage infrastructure investments | |
| ☐ Information on your infrastructure investments' ESG performance | ☐ 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 | | |
| O We do not disclose to either clients/beneficiaries | s or the public. | |
| O We disclose to clients/beneficiaries only. | | |
| • We disclose to the public | | |
| The information disclosed to clients/beneficiaries is the same O Yes O No | | |
| Disclosure to public | Disclosure to clients/beneficiaries | |
| ☐ Details on the overall engagement strategy | ☐ Details on the overall engagement strategy | |
| ☐ Details on the selection of engagement cases and definition of objectives of the selections, priorities and specific goals | ☐ Details on the selection of engagement cases and definition of objectives of the selections, priorities and specific goals | |
| ☐ Number of engagements undertaken | ☐ Number of engagements undertaken | |
| ☐ Breakdown of engagements by type/topic | ☐ Breakdown of engagements by type/topic | |
| ☐ Breakdown of engagements by region | ☐ Breakdown of engagements by region | |
| ☐ An assessment of the current status of the progress achieved and outcomes against defined objectives | ☐ An assessment of the current status of the progress achieved and outcomes against defined objectives | |
| ☐ Examples of engagement cases | ☐ 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 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 | ☐ Details on whether the provided information | |
| ☐ Outcomes that have been achieved from the engagement | has been externally assured ☐ Outcomes that have been achieved from | |
| ☐ Other information | 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 | |



| 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 O Yes O No | | | |
| Disclosure to public | Disclosure to clients/beneficiaries | | |
| O Disclose all voting decisions | O Disclose all voting decisions | | |
| O Disclose some voting decisions | O Disclose some voting decisions | | |
| O Only disclose abstentions and votes against management | 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 | | | |
| O We do not disclose to either clients/beneficiaries | s or the public. | | |
| O We disclose to clients/beneficiaries only. | | | |
| O We disclose to the public | | | |
| The information disclosed to clients/benefici O Yes O No | aries is the same | | |
| Disclosure to public | Disclosure to clients/beneficiaries | | |
| O Broad approach to ESG incorporation | O Broad approach to ESG incorporation | | |
| O Detailed explanation of ESG incorporation strategy used | Detailed explanation of ESG incorporation strategy used | | |
| [Dropdown] | [Dropdown] | | |
| Quarterly, Biannually, Annually, Less frequently than annually, Ad hoc/when requested | Quarterly, Biannually, Annually, Less frequently than annually, Ad hoc/when requested | | |
| URL | | | |
| URL | | | |
| Private equity | | | |
| We do not disclose to either clients/beneficiariesWe disclose to clients/beneficiaries only. | s or the public. | | |



| | O We disclose to the public | | | |
|--|--|---|--|--|
| | The information disclosed to clients/benefici | | | |
| | Disclosure to public | Disclosure to clients/beneficiaries | | |
| | ☐ ESG information in relationship to our pre- investment activities | ☐ ESG information in relationship to our pre- investment activities | | |
| | ☐ ESG information in relationship to our post-investment monitoring and ownership activities | ESG information in relationship to our post- investment monitoring and ownership activities | | |
| | ☐ Information on our portfolio companies' ESG performance | ☐ Information on our portfolio companies' ESG performance | | |
| | ☐ Other, specify | ☐ 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 | | | |
| | | | | |
| | O We do not disclose to either clients/beneficiaries | s or the public. | | |
| | We disclose to clients/beneficiaries only. We disclose to the public | | | |
| | | | | |
| | The information disclosed to clients/beneficiaries is the same O Yes O No | | | |
| | Disclosure to public | Disclosure to clients/beneficiaries | | |
| | ☐ ESG information on how you select property investments | ☐ ESG information on how you select property investments | | |
| | ☐ ESG information on how you monitor and manage property investments | ☐ ESG information on how you monitor and manage property investments | | |
| | ☐ Information on your property investments' ESG performance | ☐ Information on your property investments' ESG performance | | |
| | ☐ Other; specify | ☐ Other; specify | | |
| | [Dropdown] | [Dropdown] | | |
| | Quarterly, Biannually, Annually, Less frequently than annually, Ad hoc/when requested | Quarterly, Biannually, Annually, Less frequently than annually, Ad hoc/when requested | | |
| | URL URL | | | |
| | | | | |
| | Selection, Appointment and Monitoring (SAM) O We do not disclose to either clients/beneficiaries or the public. O We disclose to clients/beneficiaries only. | | | |
| | | | | |
| | | | | |
| | | | | |



| | O We disclose to the public The information disclosed to clients/beneficiaries is the same O Yes O No | | |
|---------|---|---|--|
| | | | |
| | Disclosure to public | Disclosure to clients/beneficiaries | |
| | ☐ How responsible investment considerations are included in manager selection, appointment and monitoring processes | ☐ 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 | ☐ 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 | ☐ E, S and/or G impacts and outcomes that have resulted from your managers' investments and/or active ownership | |
| | ☐ Other; specify | ☐ 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 | | | |
| | Hedge Funds | | |
| | ○ We do not disclose to either clients/beneficiaries or the public. | | |
| | O We disclose to clients/beneficiaries only. | | |
| | O We disclose to the public | | |
| | The information disclosed to clients/beneficiaries is the same O Yes O No | | |
| | Disclosure to public and URL | Disclosure to clients/beneficiaries | |
| | O Broad approach to RI incorporation for all strategies | O Broad approach to RI incorporation for all strategies | |
| | O Detailed explanation of RI incorporation for each strategy used | O Detailed explanation of RI incorporation for each strategy used | |
| | [Dropdown] | [Dropdown] | |
| | Quarterly, Biannually, Annually, Less frequently than annually, Ad hoc/when requested | Quarterly, Biannually, Annually, Less frequently than annually, Ad hoc/when requested | |
| | URL | | |
| | URL | | |
| SG 19.2 | Additional information. | | |
| | [OPTIONAL] | | |
| | | | |



| 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, mewsletters 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 det |
| 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]. |



| ASSESSMENT | | | |
|--|---|-------------|--|
| | 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 ★ | | |
| SG 19 | 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 | 0 | |
| | 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 | 0 | |
| | 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 | 0 | |
| 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 | | |



| | Four or more items of information disclosed annually or more frequently | *** |
|----------------|---|-------------|
| Listed Equity | Active Ownership - Voting | |
| | Selected response | Level score |
| | 'No' | 0 |
| | 'Yes' and some voting decisions/only abstentions less frequently than annually | * |
| | 'Yes' and all voting decisions less frequently than annually OR | |
| | 'Yes' and some voting decisions/only abstentions more frequently than annually | ** |
| | 'Yes' and all voting decisions more frequently than annually | *** |
| Listed Equity | - Incorporation | <u>'</u> |
| | Selected response | Level score |
| | No | 0 |
| | 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 | 0 |
| | 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 | 0 |
| | 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 | *** |
| | | |



| 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 | 0 |
| | 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 | 0 | |
| One option selected from CM 01.1 ★★ | | ** | |
| | Two options selected from CM 01.1 | *** | |