

PRI REPORTING FRAMEWORK 2018 – SERVICE PROVIDERS Strategy and Governance (SG)

2018

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Understanding this document

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

Top bar

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

xxx 01	Indicator status MANDATORY	Purpose GATEWAY
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Indicator status

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

Purpose

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

Underneath the indicator

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

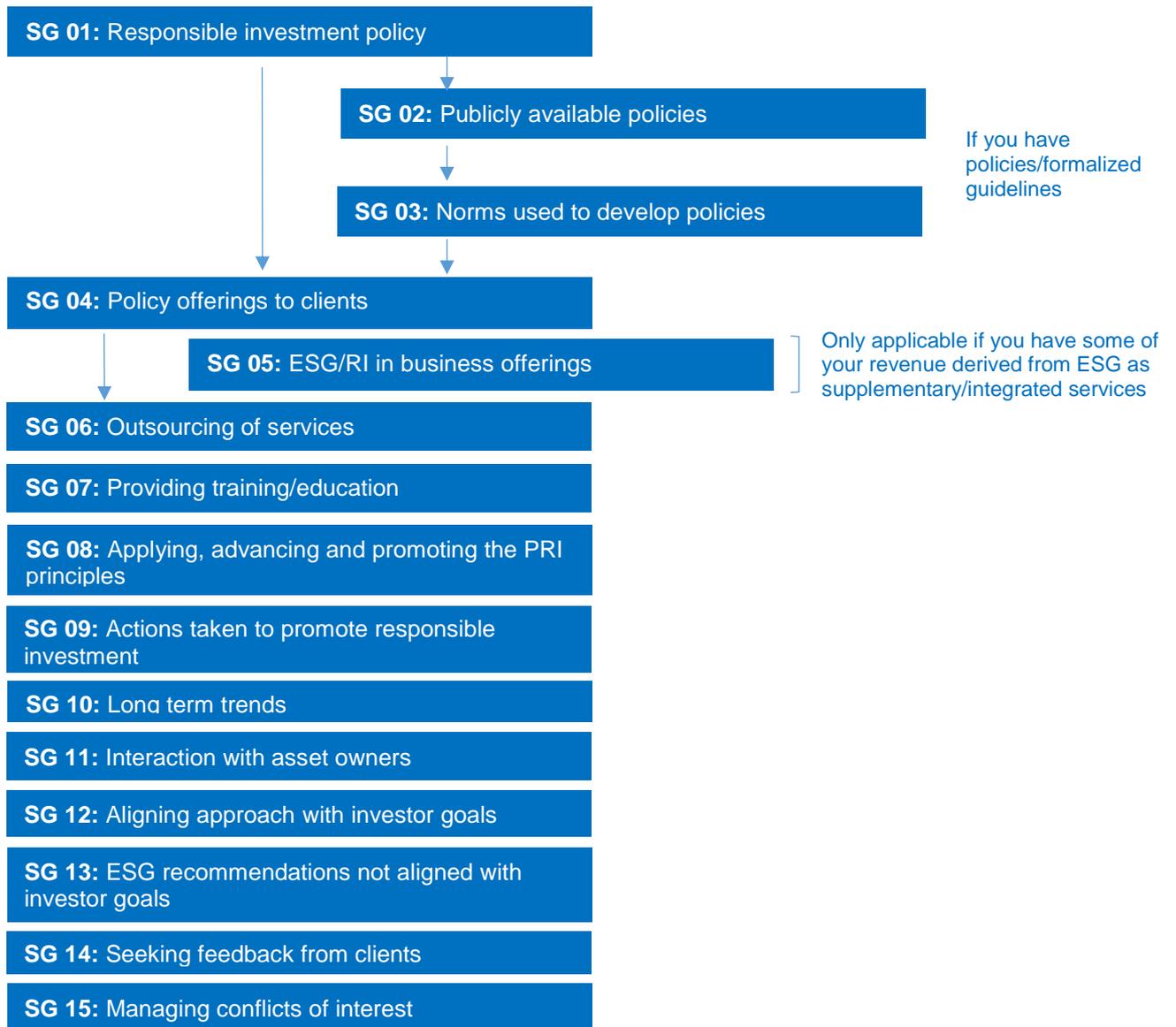
xxx 01	EXPLANATORY NOTES
xxx 01.1	This provides guidance on how to interpret the sub-indicators, including examples of what could be reported.
xxx 01.2	
LOGIC	
xxx 01	This explains when this indicator is applicable and/or if it has an impact on subsequent indicators. If there is no logic box, the indicator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

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 approach to responsible investment and ESG services (i.e. your governance; policies that cover your approach; how you apply, promote, and advance the Principles; and how you take into account long term risks). You can also report on how you interact with clients and incorporate feedback.

Indicator	Update
SG 01	Indicators have been reworded to improve clarity. Indicator 01.3 options have been modified.
SG 02	The options have been modified.
SG 03	New Additional Information indicator has been added.
SG 04	Indicator 04.1 & 04.2 have been reworded to capture new information. New Additional Information indicator has been added.
SG 05	Indicator 05.1 has been reworded to improve clarity. Indicator 05.2 has been amended to capture new information. New indicators 05.3 & 05.4 have been added to capture new information. New Additional Information indicator has been added.
SG 06	Indicator 06.1 has been reworded to improve clarity.
SG 07	Indicator 07.1 options have been modified. Indicator 07.3 has been added to capture new information. New Additional Information indicator has been added.
SG 08	Previous indicator 08 has been deleted. This indicator has been renumbered from SG 09.
SG 09	This indicator has been renumbered from SG 10. Indicator 09.1 has been reworded to capture new information.
SG 10	This indicator has been renumbered from SG 11. New Additional Information indicator has been added.
SG 11	Previous Indicator SG 12 has been deleted. This indicator has been renumbered from SG 13. Previous indicator 13.3 has been deleted. New Additional Information indicator has been added.

SG 12	This indicator has been renumbered from SG 14.
SG 13	This indicator has been renumbered from SG 15.
SG 14	This indicator has been renumbered from SG 16.
SG 15	This indicator has been renumbered from SG 17. New Additional Information indicator has been added.
Prefilling	<p>If you have responded to the Framework before, responses to this module can be prefilled from the previous year, with the following exceptions:</p> <ul style="list-style-type: none"> • SG 01.3: Will not prefill because new selection options have been added • SG 02.1: Will not prefill because new selection options have been added • SG 04.2: Will not prefill because it is a new indicator • SG 05.2-05.4: Will not prefill because they are either new, have been reworded and/or have new selection options • SG 06.1: Will not prefill because it has been reworded • SG 07.1: Will not prefill because new selection options have been added • SG 07.3: Will not prefill because it is a new indicator

SG 01.5	[OPTIONAL]
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SG 01	EXPLANATORY NOTES
SG 01.1	State here your organisational commitment to RI/ ESG and how this influences your business model. You can include a link to a public website or documents that explain further.
SG 01.3	<p>Policy here refers to an overall statement of how you approach responsible investment, or ESG issues, in your activities. Such a policy will normally address a broad range of issues and outline the activities an organisation undertakes to address them. Whether or not you have such an overall policy, you may have guidelines on ESG or responsible investment issues within other policies (e.g. on specific issues such as corporate governance or climate change; on specific activities such as voting).</p> <p>This section does not focus on policies covering office or operational management (e.g., recycling).</p> <p><i>Policy components/types</i></p> <p>The policies listed here may be contained in a single document or multiple separate documents. You may therefore be able to tick multiple boxes.</p>
LOGIC	
SG 01	<p>SG 01.3 – 01.4 will be applicable if you report “Yes” in SG 01.2.</p> <p>SG 02 will be applicable if you report ‘Yes’ in SG 01.2.</p> <p>SG 03 will be applicable if you report ‘Yes’ in SG 01.2.</p>

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

SG 02	Indicator status MANDATORY	Purpose <i>DESCRIPTIVE</i>
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SG 02	INDICATOR		
SG 02.1	Indicate which of your policy documents or statements (if any) are publicly available. Provide the URL and an attachment of the document.		
	Policy or document name	URL	Attachment (optional)
	<input type="checkbox"/> [a] Policy setting out your overall ESG/RI approach		
	<input type="checkbox"/> [b] Formalised guidelines on environmental factors		
	<input type="checkbox"/> [c] Formalised guidelines on social factors		
	<input type="checkbox"/> [d] Formalised guidelines on corporate governance factors		
	<input type="checkbox"/> [e] Formalised guidelines on engagement approach		
	<input type="checkbox"/> [f] Formalised guidelines on (proxy) voting approach		
	<input type="checkbox"/> [g] Other, specify (1) _____		
	<input type="checkbox"/> [h] Other, specify (2) _____		
	<input type="radio"/> We do not publicly disclose our policy documents		
SG 02.2	Additional information. [OPTIONAL]		

SG 02	EXPLANATORY NOTES
SG 02.2	If your policy on your ESG approach to your business and services, other responsible investment-related policies, or guidance documents are not publicly available, you may indicate whether you plan to publish them in the future or why you do not intend to do so.

LOGIC	
SG 02.1	Only the options selected in SG 01.3 will be listed in this indicator.

SG 03	Indicator status MANDATORY	Purpose <i>DESCRIPTIVE</i>
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SG 03	INDICATOR
	Indicate what standards you have used to develop your organisation's policies. Tick all that apply.
SG 03.1	<input type="checkbox"/> UN Principles for Responsible Investment <input type="checkbox"/> UN Global Compact Principles <input type="checkbox"/> UN Guiding Principles on Business and Human Rights <input type="checkbox"/> Universal Declaration of Human Rights <input type="checkbox"/> UN Sustainable Development Goals <input type="checkbox"/> International Bill of Human Rights <input type="checkbox"/> International Labour Organisation Conventions <input type="checkbox"/> IFC Performance Standards <input type="checkbox"/> United Nations Convention Against Corruption <input type="checkbox"/> OECD Principles of Corporate Governance <input type="checkbox"/> OECD Guidelines for Multinational Enterprises <input type="checkbox"/> Other, specify (1) _____ <input type="checkbox"/> Other, specify (2) _____ <input type="checkbox"/> Other, specify (3) _____ <input type="checkbox"/> Other, specify (4) _____ <input type="checkbox"/> Other, specify (5) _____ <input type="radio"/> None of the above
SG 03.2	Additional information. [OPTIONAL]

SG 03	EXPLANATORY NOTES
SG 03.1	This indicator focuses on the types of international norms that were used to develop your policy.

SG 04	Indicator status MANDATORY	Purpose DESCRIPTIVE
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SG 04			
SG 04.1	Indicate whether you offer standard, off the shelf, policies to clients as part of your product offerings, and/or whether you create tailored versions for individual clients.		
		Off the shelf	Tailored
	Asset class-specific RI guidelines	<input type="checkbox"/>	<input type="checkbox"/>
	Sector-specific RI guidelines	<input type="checkbox"/>	<input type="checkbox"/>
	Screening/exclusions policy	<input type="checkbox"/>	<input type="checkbox"/>
	Engagement policy	<input type="checkbox"/>	<input type="checkbox"/>
	(Proxy) voting policy	<input type="checkbox"/>	<input type="checkbox"/>
	RI guidelines set out within the Investment Policy Statement (IPS)	<input type="checkbox"/>	<input type="checkbox"/>
	RI guidelines set out in a freestanding RI policy	<input type="checkbox"/>	<input type="checkbox"/>
	Multi-year RI implementation project plan	<input type="checkbox"/>	<input type="checkbox"/>
	Conflict of interest management policy	<input type="checkbox"/>	<input type="checkbox"/>
	Stockbroker allocation policy	<input type="checkbox"/>	<input type="checkbox"/>
	Securities lending policy	<input type="checkbox"/>	<input type="checkbox"/>
	Other, please specify (1)_____	<input type="checkbox"/>	<input type="checkbox"/>
	Other, please specify (2)_____	<input type="checkbox"/>	<input type="checkbox"/>
	Other, please specify (3)_____	<input type="checkbox"/>	<input type="checkbox"/>
○ None of the above			
SG 04.2	Provide a brief description of the key elements, any variations, or exceptions applying to these policies.		

SG 04.3	Additional information [OPTIONAL]

SG 04	EXPLANATORY NOTES
SG 04.2	<p>You may wish to comment on:</p> <ul style="list-style-type: none"> • the typical scope of the policies; • how frequently it is reviewed by the client; • any significant exceptions to the policies; • how the policies are typically implemented by the clients.
LOGIC	
SG 04	SG 04.2 will be applicable if you report on any of the options listed in SG 04.1, except for 'None of the above'.

SG 05	Indicator status MANDATORY	Purpose DESCRIPTIVE
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SG 05	INDICATOR		
SG 05.1	Briefly describe how you include ESG/RI factors as part of your business offerings.		
	Business area	How you incorporate ESG/RI factors	
	[a]Reporting	(Max 250)	
	[b]Stewardship Services		
	[c]Advisory and Consultancy		
	[d]Research and Data Provision		
	[e]Other, specify (1) _____		
	[f]Other, specify (2)_____		
[g]Other, specify (3)_____			
SG 05.2	Indicate the roles in your organisation, and indicate for each whether they have oversight and/or implementation responsibilities for ESG/RI.		
	Roles present in your organisation	Oversight/accountability for RI	Implementation of RI
	Board	<input type="checkbox"/>	<input type="checkbox"/>
	Directors	<input type="checkbox"/>	<input type="checkbox"/>
	Chief Executive Officer (CEO), Chief Financial Officer (CFO)	<input type="checkbox"/>	<input type="checkbox"/>

	Other chief-level staff, specify_____	<input type="checkbox"/>	<input type="checkbox"/>
	Other heads of department, specify_____	<input type="checkbox"/>	<input type="checkbox"/>
	Dedicated ESG/RI staff	<input type="checkbox"/>	<input type="checkbox"/>
	Other role, specify (1)_____	<input type="checkbox"/>	<input type="checkbox"/>
	Other role, specify (2)_____	<input type="checkbox"/>	<input type="checkbox"/>
	Other role, specify (3)_____	<input type="checkbox"/>	<input type="checkbox"/>
SG 05.3	Indicate how you ensure ESG/RI expertise for the roles where there are RI oversight/accountability or implementation responsibilities.		
	<input type="checkbox"/> Staff training on ESG/RI incorporation		
	<input type="checkbox"/> Including ESG/RI knowledge factors in personal development goals		
	<input type="checkbox"/> Having development plans that aim to enhance ESG/RI knowledge of certain departments/teams/individuals		
	<input type="checkbox"/> Including ESG in selection requirements when hiring new employees		
	<input type="checkbox"/> Other, specify (1)_____		
	<input type="checkbox"/> Other, specify (2)_____		
	<input type="checkbox"/> Other, specify (3)_____		
<input type="checkbox"/> Other, specify (4)_____			
SG 05.4	Indicate whether your organisation has any ESG/RI linked incentives for its employees.		
	<input type="radio"/> Yes	<input type="radio"/> Yes	

SG 05.5	Describe the ESG/RI linked incentives.
SG 05.6	Additional information [OPTIONAL]

SG 05	EXPLANATORY NOTES
SG 05.1	Organisations may take a different approach to the inclusion of ESG and RI factors when they are an underlying part of their offerings, as compared to an ESG supplementary product. This indicator allows you to briefly describe the approach of your organisation.
SG 05.2	<p>Oversight and implementation are differentiated as follows.</p> <p>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 RI/ESG performance.</p> <p>Individuals with implementation roles are those charged with implementing specific aspects of the organisation's RI/ESG practices, for example, conducting ESG-related research, incorporating ESG issues into asset allocation advice, voting recommendations and engagement prioritization.</p>
SG 05.4	<p>ESG/RI linked incentives might be monetary, recognition or exposure, and can be applicable for a number of areas, e.g. ensuring policy implementation, compensation linked to investment manager performance and similar.</p> <p>You may wish to specify whether there is a different approach to ESG/RI-linked incentives for employees working with ESG integrated products compared to ESG supplementary products.</p>

LOGIC	
SG 05.1	The options (business areas) available to you in this table depend on the information you reported in OO 05.1
SG 05.2	Selecting any of the options in SG 05.2, except for 'None of the above', will unlock SG 05.3.
SG 05.4	Selecting 'Yes' will unlock SG 05.5.

SG 06	Indicator status MANDATORY TO REPORT, VOLUNTARY TO DISCLOSE	Purpose DESCRIPTIVE
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SG 06	INDICATOR																		
SG 06.1	<p style="background-color: #E6F2FF;">Indicate whether you outsource some of your services. Report percentage of services outsourced as percentage for that specific business area.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #A9A9A9;"> <th style="text-align: left; padding: 5px;">Business area</th> <th style="text-align: left; padding: 5px;">Percentage of service outsourced</th> </tr> </thead> <tbody> <tr> <td style="padding: 5px;"><input type="checkbox"/> Reporting</td> <td style="padding: 5px;"><input style="width: 50px;" type="text"/> %</td> </tr> <tr> <td style="padding: 5px;"><input type="checkbox"/> Active Ownership Services</td> <td style="padding: 5px;"><input style="width: 50px;" type="text"/> %</td> </tr> <tr> <td style="padding: 5px;"><input type="checkbox"/> Advisory and Consultancy</td> <td style="padding: 5px;"><input style="width: 50px;" type="text"/> %</td> </tr> <tr> <td style="padding: 5px;"><input type="checkbox"/> Research and Data Provision</td> <td style="padding: 5px;"><input style="width: 50px;" type="text"/> %</td> </tr> <tr> <td style="padding: 5px;"><input type="checkbox"/> Other, specify (1) _____</td> <td style="padding: 5px;"><input style="width: 50px;" type="text"/> %</td> </tr> <tr> <td style="padding: 5px;"><input type="checkbox"/> Other, specify (2) _____</td> <td style="padding: 5px;"><input style="width: 50px;" type="text"/> %</td> </tr> <tr> <td style="padding: 5px;"><input type="checkbox"/> Other, specify (3) _____</td> <td style="padding: 5px;"><input style="width: 50px;" type="text"/> %</td> </tr> <tr> <td colspan="2" style="padding: 5px;"><input type="radio"/> None of the above</td> </tr> </tbody> </table>	Business area	Percentage of service outsourced	<input type="checkbox"/> Reporting	<input style="width: 50px;" type="text"/> %	<input type="checkbox"/> Active Ownership Services	<input style="width: 50px;" type="text"/> %	<input type="checkbox"/> Advisory and Consultancy	<input style="width: 50px;" type="text"/> %	<input type="checkbox"/> Research and Data Provision	<input style="width: 50px;" type="text"/> %	<input type="checkbox"/> Other, specify (1) _____	<input style="width: 50px;" type="text"/> %	<input type="checkbox"/> Other, specify (2) _____	<input style="width: 50px;" type="text"/> %	<input type="checkbox"/> Other, specify (3) _____	<input style="width: 50px;" type="text"/> %	<input type="radio"/> None of the above	
Business area	Percentage of service outsourced																		
<input type="checkbox"/> Reporting	<input style="width: 50px;" type="text"/> %																		
<input type="checkbox"/> Active Ownership Services	<input style="width: 50px;" type="text"/> %																		
<input type="checkbox"/> Advisory and Consultancy	<input style="width: 50px;" type="text"/> %																		
<input type="checkbox"/> Research and Data Provision	<input style="width: 50px;" type="text"/> %																		
<input type="checkbox"/> Other, specify (1) _____	<input style="width: 50px;" type="text"/> %																		
<input type="checkbox"/> Other, specify (2) _____	<input style="width: 50px;" type="text"/> %																		
<input type="checkbox"/> Other, specify (3) _____	<input style="width: 50px;" type="text"/> %																		
<input type="radio"/> None of the above																			
SG 06.2	<p style="background-color: #E6F2FF;">For each business area, describe what components you outsource to other organisations.</p> <div style="border: 1px solid #ccc; height: 40px; margin-top: 5px;"></div>																		
SG 06.3	<p style="background-color: #E6F2FF;">For each business area, describe how you ensure the organisation implementing your outsourced services adheres to your beliefs and policies on ESG/RI.</p> <div style="border: 1px solid #ccc; height: 40px; margin-top: 5px;"></div>																		

SG 06	EXPLANATORY NOTES
SG 06	<p>Any form of collaboration with external partners where the external partner receives payment from your organisation for the execution of services or advice on behalf of your organisation should be reported here as outsourced services.</p> <p>The outsourced services can be enlisted for additional revenue on an ad-hoc basis, but can also include regular/permanent outsourcing of services that may not necessarily result in an explicit addition to revenue. As an example, a client might request an analysis of a portfolio's carbon footprint, at which point your organisation might outsource this analysis to an emissions analyst for the additional expertise. Your organisation might also have certain aspects such as outsourcing of data from external data providers in order to perform research and analysis themselves.</p> <p>This indicator allows you to describe how you ensure consistency throughout your services in terms of ESG/RI beliefs and adherence to any formalized policies on ESG/RI that you might have.</p>
LOGIC	
SG 06.1	If you report that any percentage >0% of your services are outsourced, SG 06.2 and 06.3 will be applicable to you.

SG 07	Indicator status MANDATORY	Purpose DESCRIPTIVE
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SG	INDICATOR
SG 07.1	<p>Indicate whether you provide training/educational services on ESG/RI. Tick all that apply.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Board/trustee training <input type="checkbox"/> Investment manager training <input type="checkbox"/> Regulatory bodies/authorities or public policy makers <input type="checkbox"/> Corporate executive training <input type="checkbox"/> ESG analyst training <input type="checkbox"/> Other, specify (1)_____ <input type="checkbox"/> Other, specify (2)_____ <input type="checkbox"/> Other, specify (3)_____ <input type="checkbox"/> Other, specify (4)_____ <input type="radio"/> None of the above
SG 07.2	<p>Describe the main components of your training/educational services on ESG/RI and any variations depending on the group you provide training/education to.</p>
SG 07.3	<p>Describe whether these training/educational services include any commercial elements.</p>
SG 07.4	<p>Additional information [OPTIONAL]</p>

SG 07	EXPLANATORY NOTES
SG 07.3	Use this indicator to describe to what extent you include information about your other service offerings as part of the training/educational sessions.
LOGIC	
SG 07.1	SG 07.2 and SG 07.3 will be applicable if you reported that you provide training/educational services to any of the groups listed in SG 07.1, including 'Other, specify'.

SG 08	Indicator status MANDATORY	Purpose DESCRIPTIVE
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SG 08	INDICATOR
SG 08.1	Describe how your organisation applies, advances and promotes the PRI Principles.
SG 08.2	Highlight whether there are any ways that your organisation would like to engage further with the PRI. [OPTIONAL]

SG 08	EXPLANATORY NOTES
SG 08	Use this indicator to describe where you are specifically promoting the PRI Principles through your work and other activities. You may list the specific events, publications, and other actions you undertook during the reporting year to explicitly apply, advance, and promote the PRI Principles. Advancement of general RI and ESG practices can be described in the subsequent indicator.

SG 09	Indicator status MANDATORY	Purpose
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SG 09	INDICATOR
SG 09.1	<p>Indicate which of the following actions your organisation has taken to promote responsible investments during the reporting year, independently of collaborative initiatives.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Provided or supported education or training programmes for clients, investment managers, legal advisers or other investment organisations <input type="checkbox"/> Provided financial support for academic or industry research on responsible investment <input type="checkbox"/> Encouraged better transparency and disclosure of responsible investment practices across the investment industry <input type="checkbox"/> Spoken publicly at events and conferences to promote responsible investment <input type="checkbox"/> Written and published in-house research papers on responsible investment <input type="checkbox"/> Encouraged the adoption of the PRI <input type="checkbox"/> Written and published articles on responsible investment in the media <input type="checkbox"/> Policy engagements and other interactions <input type="checkbox"/> Other, specify _____
SG 09.2	<p>Additional information. [OPTIONAL]</p>

SG 09	EXPLANATORY NOTES
SG 09	Describe any activities that help contribute to the wider understanding of RI or ESG issues, including pro bono work, training or thought leadership activities that your organisation undertakes.

SG 10	Indicator status MANDATORY	Purpose DESCRIPTIVE
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SG 10	INDICATOR
SG 10.1	<p>Indicate which of the following long-term trends are addressed in your product outputs.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Changing demographics <input type="checkbox"/> Climate change <input type="checkbox"/> Resource scarcity <input type="checkbox"/> Technology developments <input type="checkbox"/> Other, specify (1) _____ <input type="checkbox"/> Other, specify (2) _____ <input type="radio"/> None of the above
SG 10.2	<p>Explain how this long-term trend affects your product outputs.</p>
SG 10.3	<p>If none of the above are applicable, please explain why not.</p>
SG 10.4	

SG 10	EXPLANATORY NOTES
SG 10.1	<p>This indicator gives you the opportunity to report on long term ESG trends that your organisation is considering as part of your overall approach to ESG and/or responsible investment. The list of trends is not exhaustive and it is expected that signatories will provide examples of additional trends that are not currently captured. PRI will continue to monitor and update the list in future years.</p>
SG 10.2	<p>The terms used are broad and may impact business and investment processes in a number of different ways. Please provide detail on how these trends will impact your approach in terms of your product outputs.</p>
LOGIC	
SG 10.1	<p>SG 10.2 will be applicable if you report that you address any of the long term trends in your product outputs, this includes 'Other, specify____'.</p> <p>SG 10.3 will be applicable if you report 'None of the above'.</p>

SG 11	Indicator status MANDATORY	Purpose
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SG 11	INDICATOR	
SG 11.1	Indicate whether you interact with asset owner clients.	
	<input type="radio"/> Yes, we do	<input type="radio"/> No, we do not
	Indicate the typical frequency and type of interactions with your asset owner clients.	
	Type of interaction	Frequency
SG 11.2	<input type="checkbox"/> Board of trustee meetings	[DROPDOWN] Daily, Weekly, Monthly, Quarterly, Bi-annually, Annually, Ad-hoc basis, Other, specify (1)____,
	<input type="checkbox"/> Investment committee meetings	[same as above]
	<input type="checkbox"/> Trustee training workshops	
	<input type="checkbox"/> Formal regular meetings outside of committee meetings	
	<input type="checkbox"/> Informal meetings or calls	
	<input type="checkbox"/> Other, specify (1) _____	
	<input type="checkbox"/> Other, specify (2) _____	
	<input type="checkbox"/> Other, specify (3) _____	
	<input type="checkbox"/> Other, specify (4) _____	
SG 11.3	Additional information [OPTIONAL]	

SG 11	EXPLANATORY NOTES
SG 11	<p>This indicator is asking about your typical interactions with asset owner clients, <u>not</u> the investment managers you might be researching for your clients.</p> <p>This indicator will in part help PRI understand the relationship between service providers and their asset owner clients, the intensity of that relationship and they type of interaction they have to ensure clients are well informed of their services.</p> <p>Investor client interactions, frequency and topics may sometimes vary. Please report your typical approach.</p> <p>‘Interaction’ is taken to mean meetings or calls where substantive issues are discussed. It does not mean monitoring items such as reporting.</p>
SG 11.2	The information you report here is understood as the typical approach to a type of interaction and frequency of interaction that. Some level of generalization and aggregation of information may be needed to respond to this indicator.

SG 11.3	You may wish to describe the subject areas that you address in your interactions with asset owner clients. These may include, but are not limited to: RI-policy incorporation, how ESG affects the investment strategy, ESG integration, how ESG affects valuations, engagement and (proxy) voting, conflicts of interest, ESG risks, research on RI topics, ESG ratings, etc.
LOGIC	
SG 11.1	SG 11.2 will be applicable if you report 'Yes, we do'

SG 12	Indicator status MANDATORY	Purpose DESCRIPTIVE
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SG 12	INDICATOR
SG 12.1	Describe how you align your organisation's philosophy on and approach to ESG/RI with investor goals. <input type="radio"/> This is not relevant for my organisation
SG 12.2	Additional information. [OPTIONAL]

SG 12	EXPLANATORY NOTES
SG 12	<p>This indicator allows you to elaborate on how your organisation adapts its approach and execution of ESG services according to the investment goals or other needs of investor clients.</p> <p>Investor goals may be general such as generating superior, risk-adjusted returns or being an active owner, channelling capital towards positive impact investment opportunities and/or contributing to the sustainability of the financial markets.</p> <p>Actions to align your organisation's philosophy on and approach to ESG with investor goals may include, but are not limited to: compiling an RI/ESG value or belief statement, setting RI outcomes to be achieved over time, setting timelines for RI outcomes, documenting RI outcomes, timelines and guidelines, and RI/ESG training when beliefs and outcomes diverge.</p> <p>If this indicator is not applicable to your organisation, please explain why not by using the 'Additional information' box.</p>

SG 13	Indicator status MANDATORY	Purpose DESCRIPTIVE
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SG 13	INDICATOR
SG 13.1	<p>Describe what steps you take, if any, when your ESG recommendations are not in line with investor goals.</p> <hr/> <p><input type="radio"/> This is not relevant for my organisation</p>
SG 13.2	<p>Additional information. [OPTIONAL]</p>

SG 13	EXPLANATORY NOTES
SG 135	<p>Describe if you take any actions to re-align your ESG recommendations with your client's goals, either by modifying your approach or by providing the investor with further information to assist with decision making.</p> <p>If this indicator is not applicable for your organisation, please explain why not by using the 'Additional information' box.</p>

SG 14	Indicator status MANDATORY	Purpose DESCRIPTIVE
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SG 14	INDICATOR
SG 14.1	Indicate whether you seek feedback from clients on your RI/ESG services and product offerings. <input type="radio"/> Yes <input type="radio"/> No
SG 14.2	Describe how you use this feedback in your RI/ESG services and product offerings.
SG 14.3	If not, please explain why.
SG 14.4	

SG 14	EXPLANATORY NOTES
SG 14	It may be possible to ask clients to comment on the utility of the work carried out for them, in order to understand and potentially make changes to product and service offerings. This might not always be possible or appropriate in the client relationship.
LOGIC	
SG 14.1	SG 14.2 will be applicable if you report 'Yes'. SG 14.3 will be applicable if you report 'No'.

SG 15	Indicator status MANDATORY	Purpose DESCRIPTIVE
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SG 15	INDICATOR
SG 15.1	Indicate whether your organisation has a policy for managing potential conflicts of interest. <div style="display: flex; justify-content: space-around;"> <input type="radio"/> Yes <input type="radio"/> No </div>
SG 15.2	Describe how you manage potential conflicts of interest.
SG 15.3	Describe how you ensure that company employees do not derive any personal gain from the use of information collected during your work process.
SG 15.4	Additional information [OPTIONAL]

SG 15	EXPLANATORY NOTES
SG 15	A conflict of interest may occur where the interest of a client is not the same as, or is not perceived to be the same as, that of your own organisation.
LOGIC	
SG 15.1	SG 15.2 and 15.3 will be applicable if you report 'Yes'.