




The image shows two overlapping forms from the PRI LEA (Leadership Engagement) toolkit. The top form is LEA 02, titled 'Discretionary', and the bottom form is LEA 03, titled 'Mandatory'. Both forms are designed for recording engagement activities with companies. LEA 02 includes a section for 'Reason for interaction' with checkboxes for various purposes such as 'To support investment decision-making', 'To enhance corporate transparency', and 'To support investment decision-making in a company's ESG issues'. LEA 03 includes a section for 'Type of engagement' with checkboxes for 'Individual/ internal staff engagements', 'Collaborative engagements', and 'Service provider engagements'.

RI TRANSPARENCY REPORT

2014/15

ACTIAM



UNEP Finance Initiative
Changing finance, financing change



United Nations Global Compact

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

About this report

The PRI Reporting Framework is a key step in the journey towards building a common language and industry standard for reporting responsible investment (RI) activities. This RI Transparency Report is one of the key outputs of this Framework. Its primary objective is to enable signatory transparency on RI activities and facilitate dialogue between investors and their clients, beneficiaries and other stakeholders. A copy of this report will be publicly disclosed for all reporting signatories on the [PRI website](#), ensuring accountability of the PRI Initiative and its signatories.

This report is an export of the individual Signatory organisation's response to the PRI during the 2014-15 reporting cycle. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information. As a result, the reports can be extensive. However, to help easily locate information, there is a **Principles index** which highlights where the information can be found and summarises the indicators that signatories complete and disclose.

Understanding the Principles Index

The Principles Index summarises the response status for the individual indicators and modules and shows how these relate to the six [Principles for Responsible Investment](#). It can be used by stakeholders as an 'at-a-glance' summary of reported information and to identify particular themes or areas of interest.

Indicators can refer to one or more Principles. Some indicators are not specific to any Principle. These are highlighted in the 'General' column. When multiple Principles are covered across numerous indicators, in order to avoid repetition, only the main Principle covered is highlighted.

All indicators within a module are presented below. The status of indicators is shown with the following symbols:

Symbol	Status
✓	The signatory has completed all mandatory parts of this indicator
☑	The signatory has completed some parts of this indicator
🔒	This indicator was not relevant for this signatory
-	The signatory did not complete any part of this indicator
🔍	The signatory has flagged this indicator for internal review

Within the table, indicators marked in blue are mandatory to complete. Indicators marked in grey are voluntary to complete.

Principles Index

Organisational Overview				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
OO 01	Signatory category and services	✓	Public							✓
OO 02	Headquarters and operational countries	✓	Public							✓
OO 03	Subsidiaries that are separate PRI signatories	✓	Public							✓
OO 04	Reporting year and AUM	✓	Public							✓
OO 05	Breakdown of AUM by asset class	✓	Asset mix disclosed in OO 06							✓
OO 06	How would you like to disclose your asset class mix	✓	Public							✓
OO 07	Segregated mandates or pooled funds	✓	Public							✓
OO 08	Breakdown of AUM by market	✓	Public							✓
OO 09	Additional information about organisation	✓	Public							✓
OO 10	RI activities for listed equities	✓	Public							✓
OO 11	RI activities in other asset classes	✓	Public							✓
OO 12	Modules and sections required to complete	✓	Public							✓

Overarching Approach				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
OA 01	RI policy and other guidance documents	✓	Public							✓
OA 02	Publicly available policies / documents	✓	Public						✓	
OA 03	Policy components and coverage	✓	Public	✓	✓					
OA 04	Conflicts of interest	✓	Public							✓
OA 05	RI goals and objectives	✓	Public							✓
OA 06	Main goals/objectives this year	✓	Public							✓
OA 07	Governance, management structures and RI processes	✓	Public							✓
OA 08	RI roles and responsibilities	✓	Public							✓
OA 09	RI in performance management, reward and/or personal development	✓	Public							✓
OA 10	Collaborative organisations / initiatives	✓	Public				✓	✓		
OA 11	Promoting RI independently	✓	Public				✓			
OA 12	Dialogue with public policy makers or standard setters	✓	Public				✓	✓	✓	
OA 13	ESG issues in strategic asset allocation	✓	Public	✓						
OA 14	Allocation of assets to environmental and social themed areas	✓	Public	✓						
OA 15	ESG issues for internally managed assets not reported in framework	✓	Public							✓
OA 16	ESG issues for externally managed assets not reported in framework	🔒	n/a							✓
OA 17	RI/ESG in execution and/or advisory services	🔒	n/a	✓	✓					
OA 18	Innovative features of approach to RI	✓	Public							✓
OA 19	Internal and external review and assurance of responses	✓	Public							✓

Indirect – Manager Selection, Appointment and Monitoring				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
SAM 01	Description of RI considerations	✓	Public	✓					✓	
SAM 02	Role of investment consultants	✓	Public				✓			
SAM 03	RI factors in selection, appointment and monitoring across asset classes	✓	Public							✓
SAM 04	Breakdown of passive, active quant and active fundamental	✓	Public							✓
SAM 05	ESG incorporation strategies	✓	Public	✓	✓					
SAM 06	Selection processes (listed assets)	✓	Public	✓					✓	
SAM 07	Appointment considerations (listed assets)	✓	Public				✓			
SAM 08	Monitoring processes (listed assets)	✓	Public	✓						
SAM 09	Percentage of (proxy) votes cast	✓	Public		✓					
SAM 10	Selection processes (non-listed assets)	✓	Public	✓					✓	
SAM 11	Appointment considerations (non-listed assets)	✓	Public				✓			
SAM 12	Monitoring processes (non-listed assets)	✓	Public	✓					✓	
SAM 13	Description of RI considerations in 'other' asset classes	✓	Public	✓					✓	
SAM 14	Percentage of externally managed assets managed by PRI signatories	✓	Public	✓					✓	
SAM 15	Examples of ESG issues in selection, appointment and monitoring processes	✓	Public		✓					
SAM 16	Disclosure of RI considerations	✓	Public						✓	

Direct - Listed Equity Incorporation				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
LEI 01	Breakdown by passive, quantitative, fundamental and other active strategies	✓	Public	✓						
LEI 02	Description of ESG incorporation	✓	Public	✓						
LEI 03	Percentage of each incorporation strategy	✓	Public	✓						
LEI 04	Type of ESG information used in investment decision	✓	Public	✓						
LEI 05	Information from engagement and/or voting used in investment decision-making	✓	Public	✓						
LEI 06	Types of screening applied	✓	Public	✓						
LEI 07	Processes to ensure screening is based on robust analysis	✓	Public	✓						
LEI 08	Processes to ensure fund criteria are not breached	✓	Public	✓						
LEI 09	Types of sustainability thematic funds/mandates	✓	Public	✓						
LEI 10	Description of ESG integration	✓	Public	✓						
LEI 11	Review ESG issues while researching companies/sectors	✓	Public	✓						
LEI 12	Processes to ensure integration is based on robust analysis	✓	Public	✓						
LEI 13	Aspects of analysis ESG information is integrated into	✓	Public	✓						
LEI 14	ESG issues in index construction	✓	Public	✓						
LEI 15	How ESG incorporation has influenced portfolio composition	✓	Public	✓						
LEI 16	Incorporation of ESG issues has improved financial/ESG performance and reduced risk	✓	Public	✓						
LEI 17	Examples of ESG issues that affected your investment view / performance	✓	Public	✓						
LEI 18	Disclosure of approach to ESG incorporation	✓	Public		✓				✓	

Direct - Listed Equity Active Ownership				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
LEA 01	Description of approach to engagement	✓	Public		✓					
LEA 02	Reasoning for interaction on ESG issues	✓	Public	✓	✓	✓				
LEA 03	Process for identifying and prioritising engagement activities	✓	Public		✓					
LEA 04	Objectives for engagement activities	✓	Public		✓					
LEA 05	Process for identifying and prioritising engagement activities	✓	Public		✓					
LEA 06	Objectives for engagement activities	✓	Public		✓					
LEA 07	Role in engagement process	⚡	n/a		✓		✓			
LEA 08	Monitor / discuss service provider information	⚡	n/a		✓				✓	
LEA 09	Share insights from engagements with internal/external managers	✓	Public	✓	✓					
LEA 10	Tracking number of engagements	✓	Public		✓					
LEA 11	Number of companies engaged with, intensity of engagement and effort	✓	Public		✓					
LEA 12	Engagements on E, S and/or G issues	✓	Public		✓					
LEA 13	Companies changing practices / behaviour following engagement	✓	Public		✓					
LEA 14	Examples of ESG engagements	✓	Public		✓					
LEA 15	Disclosure of approach to ESG engagements	✓	Public		✓				✓	
LEA 16	Description of approach to (proxy) voting	✓	Public		✓					
LEA 17	Typical approach to (proxy) voting decisions	✓	Public		✓					
LEA 18	Percentage of voting recommendations reviewed	✓	Public		✓					
LEA 19	Confirmation of votes	✓	Public		✓					
LEA 20	Securities lending programme	✓	Public		✓					
LEA 21	Informing companies of the rationale of abstaining/voting against management	✓	Public		✓					
LEA 22	Percentage of (proxy) votes cast	✓	Public		✓					
LEA 23	Proportion of ballot items that were for/against/abstentions	✓	Public		✓					
LEA 24	Shareholder resolutions	✓	Public		✓					
LEA 25	Examples of (proxy) voting activities	✓	Public		✓					
LEA 26	Disclosing voting activities	✓	Public		✓				✓	

Direct - Fixed Income				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
FI 01	Breakdown by passive, quantitative, fundamental and other active strategies	✓	Public	✓						
FI 02	Breakdown of investments by credit quality	✓	Public							✓
FI 03	Description of ESG incorporation	✓	Public	✓						
FI 04	Percentage of each incorporation strategy	✓	Public	✓						
FI 05	Type of ESG information used in investment decision	✓	Public	✓						
FI 06	Types of screening applied	✓	Public	✓						
FI 07	Processes to ensure screening is based on robust analysis	✓	Public	✓						
FI 08	Processes to ensure fund criteria are not breached	✓	Public	✓						
FI 09	Types of sustainability thematic funds/mandates	-	n/a	✓						
FI 10	Description of ESG integration	✓	Public	✓						
FI 11	Review of ESG issues while researching companies/sectors	✓	Public	✓						
FI 12	Processes to ensure integration is based on robust analysis	✓	Public	✓						
FI 13	Incorporation of ESG issues into analysis and decision making	✓	Public	✓						
FI 14	ESG issues in index construction	✓	Public	✓						
FI 15	How ESG incorporation has influenced portfolio composition	✓	Public	✓						
FI 16	Incorporation of ESG issues has improved financial/ESG performance and reduced risk	✓	Public	✓						
FI 17	Examples of ESG issues that affected your investment view / performance	✓	Public	✓						
FI 18	Disclosure of approach to ESG incorporation	✓	Public		✓				✓	
FI 19	Engagement with corporate issuers	✓	Public		✓					
FI 20	Engagement with government issuers	✓	Public		✓					

Direct - Inclusive Finance				Principle							General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	7	
IFD 01	Mission and investment objective	✓	Public								✓
IFD 02	Governance, management structures and processes	✓	Public								✓
IFD 03	Social targets	✓	Public								✓
IFD 04	Percentage in equity, debt and guarantees	✓	Public								✓
IFD 05	Percentage in microfinance and/or SME finance	✓	Public								✓
IFD 06	Geographical spread of microfinance investments	✓	Public								✓
IFD 07	Tracking microfinance investees portfolio	✓	Public	✓							
IFD 08	Support financial services beyond credit, compulsory savings and/or compulsory insurance	✓	Public	✓							
IFD 09	Support the introduction of services tailored to the 'poor', 'very poor' and 'low income'	✓	Public	✓							
IFD 10	Technical assistance to investees	✓	Public	✓							
IFD 11	Public endorsement of the Client Protection Principles	✓	Public		✓						
IFD 12	Provide training and assistance for investees implementing the Client Protection Principles	✓	Public		✓						
IFD 13	Include the Client Protection Principles in investment policies	✓	Public		✓						
IFD 14	Investment in local currency	✓	Public			✓					
IFD 15	Average maturity of debt investments	✓	Public			✓					
IFD 16	Average holding period of equity investments	🔒	n/a			✓					
IFD 17	Terms and conditions	✓	Public			✓					
IFD 18	Tools for social performance reporting	✓	Public				✓				
IFD 19	Retail institutions have independent financial/social rating and/or social audit	✓	Public				✓				
IFD 20	Due diligence on and monitoring and reporting of corporate governance among investees	✓	Public				✓				
IFD 21	Training or assistance for investees on corporate governance	✓	Public				✓				
IFD 22	Percentage of investees where board seats are held	🔒	n/a				✓				
IFD 23	Procedure to integrate environmental issues in investment decision processes	✓	Public				✓				
IFD 24	Anti-corruption and whistle-blowing policies	✓	Public				✓				
IFD 25	How mission and investment objectives are communicated to stakeholders	✓	Public					✓			
IFD 26	Investors and/or the public provided with information aligned with industry standards	✓	Public					✓			
IFD 27	Transparency of pricing, terms and conditions among investees	✓	Public					✓			
IFD 28	How social performance of investees affects decision making and portfolio	✓	Public						✓		

	management												
IFD 29	Staff incentives linked to social performance measures	✓	Public							✓			
IFD 30	Collecting data regarding social outcomes of investees work	✓	Public							✓			
IFD 31	Incentivise investees to track social performance	✓	Public							✓			
IFD 32	Collaborative initiatives your organisation has supported or participated in	✓	Public								✓		
IFD 33	Encouraging investees to participate in collaborative initiatives	✓	Public								✓		
IFD 34	Encouraging your investees to participate in initiatives which contribute to the development of industry benchmarks	✓	Public								✓		

ACTIAM

Reported Information

Public version

Organisational Overview

PRI disclaimer

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Basic Information

OO 01	Mandatory	Gateway/Peering	General
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OO 01.1 Select the services you offer.

☒ Fund management

% of assets under management (AUM) in ranges

- ☐ <10%
☐ 10-50%
☒ >50%

☒ Fund of funds, manager of managers, sub-advised products

% of assets under management (AUM) in ranges

- ☒ <10%
☐ 10-50%
☐ >50%

☐ Other, specify

☐ Execution and advisory services

OO 02	Mandatory	Peering	General
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OO 02.1 Select the location of your organisation's headquarters.

Netherlands

OO 02.2 Indicate the number of countries in which you have offices (including your headquarters).

- ☒ 1
☐ 2-5
☐ 6-10
☐ >10

OO 02.3 Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).

FTE

133

OO 03	Mandatory	Descriptive	General
-------	-----------	-------------	---------

OO 03.1

Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.

- ☐ Yes
☒ No

OO 04

Mandatory

Gateway/Peering

General

OO 04.1

Indicate the year end date for your reporting year.

31/12/2014

OO 04.2

Indicate your total AUM at the end of your reporting year, excluding subsidiaries you have chosen not to report on, and advisory/execution only assets.

	trillions	billions	millions	thousands	hundreds
Total AUM		51	356	000	000
Currency	EUR				
Assets in USD		67	352	940	816

OO 04.5

Indicate the level of detail you would like to provide about your asset class mix.

- ☐ Approximate percentage breakdown to the nearest 5% (e.g. 45%)
☒ Broad ranges breakdown (i.e. <10%; 10-50%; >50%)

OO 06

Mandatory

Descriptive

General

OO 06.1

To contextualise your responses to the public, indicate how you would like to disclose your asset class mix.

- ☒ Publish our asset class mix as broad ranges

	Internally managed (%)	Externally managed (%)
Listed equity	10-50%	10-50%
Fixed income – corporate	10-50%	<10%
Fixed income – government	>50%	<10%
Fixed income – other	0	<10%
Private debt	0	<10%
Private equity	0	<10%

Property	<10%	<10%
Infrastructure	0	0
Commodities	0	0
Hedge funds	0	0
Forestry	0	0
Farmland	0	0
Inclusive finance	<10%	0
Cash	<10%	0
Other (1), specify	0	0
Other (2), specify	0	0

☐ Publish our asset class mix as per attached file (the following image formats can be uploaded: .jpg, .jpeg, .png, .bmp and .gif)

OO 07	Mandatory to Report Voluntary to Disclose	Peering	General
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OO 07.1	Provide a breakdown of your organisation's externally managed assets between segregated mandates and pooled funds.
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	% of externally managed assets
Segregated mandate(s)	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50 %
Pooled fund(s)	<input type="radio"/> 0% <input type="radio"/> <10% <input checked="" type="radio"/> 10-50% <input type="radio"/> >50 %
<i>Total externally managed assets</i>	<i>100%</i>

OO 08	Mandatory to Report Voluntary to Disclose	Peering	General
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OO 08.1

Indicate the breakdown of your organisation's AUM by market.

Market breakdown	% of AUM
Developed Markets	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50 %
Emerging, Frontier and Other Markets	<input type="radio"/> 0% <input type="radio"/> <10% <input checked="" type="radio"/> 10-50% <input type="radio"/> >50 %

OO 09

Voluntary

Descriptive

General

OO 09.1

Provide any additional information about your organisation, its mission, strategies, activities or investments which are important to contextualise your responsible investment activities.

Who we are

ACTIAM is the responsible investor for institutional clients. Through sustainable performance, service and advice, we help our clients achieve their investment goals.

This means we do much more than just offer products. We proactively think along with our clients and propose customised solutions. Everything we do is done responsibly and in cooperation with our clients.

We constantly seek to exceed our clients' expectations by expanding the services that are tailored to their specific needs. We are responsible for both the management and the administration of our clients' assets. In addition, our fund management services are playing an increasingly prominent role.

Mission & Vision

We are ACTIAM! Our mission is to assist our clients in achieving their investment goals by providing them sustainable performance, service and advice.

To be responsible, innovative and leading in everything we do, whilst working for and with our clients - that is our vision.

Gateway asset class implementation indicators

OO 10

Mandatory

Gateway

General

OO 10.1

Select the responsible investment activities your organisation implemented, directly and/or indirectly, for listed equities in the reporting year.

- ☒ We incorporate ESG issues into investment decisions on our internally managed assets
- ☒ We engage with companies on ESG issues via our staff, collaborations or service providers
- ☒ We cast our (proxy) votes directly or via service providers
- ☒ We address ESG incorporation, engagement and/or (proxy) voting in our external manager selection, appointment and/or monitoring processes
- ☐ None of the above

OO 11	Mandatory	Gateway	General
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OO 11.1	Indicate if in the reporting year you incorporated ESG issues into your investment decisions and/or your active ownership practices in the following internally managed asset classes.
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- ☒ Fixed income – corporate
- ☒ Fixed income – government
- ☒ Property
- ☒ Inclusive finance
- ☒ Cash
- ☐ None of the above

OO 11.2	Indicate if in the reporting year you addressed ESG incorporation and/or active ownership in your external manager selection, appointment and/or monitoring processes in the following externally managed asset classes.
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- ☒ Fixed income – corporate
- ☒ Fixed income – government
- ☒ Fixed Income – other
- ☒ Private debt
- ☒ Private equity
- ☒ Property
- ☐ None of the above

OO 12	Mandatory	Gateway	General
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OO 12.1	The modules and sections that you will be required to complete are listed below.
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This list is based on the percentages provided in your AUM breakdown and your responses to the gateway indicators. You are only required to report on asset classes that represent 10% or more of your AUM. You may report voluntarily on any applicable modules or sections by selecting them from the list. Fixed Income and Infrastructure are voluntary.

Core modules

- ☒ Organisational Overview
- ☒ Overarching Approach (including assets which do not have a separate module)

RI implementation directly or via service providers

	Direct - Listed Equity incorporation
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- ☒ Listed Equity incorporation

Direct - Listed Equity active ownership

- ☒ Engagements
- ☒ (Proxy) voting

Direct - Fixed Income

- ☒ Fixed Income - Corporate
- ☒ Fixed Income - Government

Direct - Other asset classes with dedicated modules

- ☐ Property
- ☒ Inclusive Finance

RI implementation via external managers

Indirect - Selection, Appointment and Monitoring of External Managers

- ☒ Listed Equities
- ☒ Fixed Income - Corporate
- ☒ Fixed Income - Government
- ☒ Fixed Income - Other
- ☒ Private Debt
- ☒ Private Equity
- ☒ Property

Closing module

- ☒ Closing module

ACTIAM

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Overarching Approach

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Responsible investment policy

OA 01	Mandatory	Gateway/Core Assessed	General
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OA 01.1	Indicate if you have a responsible investment policy.
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- ☒ Yes
☐ No

OA 01.2	Indicate if you have other guidance documents or more specific policies related to responsible investment.
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- ☒ Yes
☐ No

OA 01.3	Provide a brief description of the key elements of your responsible investment policy or, if you do not have a policy, of your overall approach to responsible investment. [Optional]
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Responsible asset management is our specialty. It is in our DNA. We believe that financial returns and added value for society readily go hand-in-hand. Underpinning our responsible investment policy are our carefully formulated Fundamental Investment Principles (FIP). These principles are based on international treaties, conventions and 'best practices', such as the UN Global Compact, OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, and the ICGN Corporate Governance principles. The Fundamental Investment Principles are not based on subjective preferences, but on widely supported values in global civil society, which have been internationally laid down in authoritative documents and cover the following areas:

- Human rights
- Fundamental labour rights
- Corruption
- The environment
- Weapons
- Client and product integrity

In executing its policy, ACTIAM decided to focus on the natural resources industry. This covers the following sectors: mining, oil and gas (including nuclear energy), forestry and paper, and food and agriculture. ACTIAM focuses on these sectors because this is where the ESG-impact and ESG-risks are the greatest.

The Fundamental Investment Principles and sector or issue frameworks are all approved by the ACTIAM Selection Committee, reporting to the board of directors. The ACTIAM Selection Committee decides on the eligibility of investments based on the advice of the ESG Research team. This decision and policy-making body comprises at least four and possibly five members: the CEO, performing the role of Chair; the CIO; the Head of the ESG Research team; the Head of Impact Investing, and preferably one independent external member, who is invited by the Chair. The ACTIAM Selection Committee can decide to include or exclude a company, institution or country from its investment universe, or to begin a constructive dialogue with a company. The committee is informed about the progress of the constructive dialogues at every meeting (at least once a quarter).

The ACTIAM Selection Committee is also authorised to request a revision of ESG-related research processes and methodologies or to decide to revise the Fundamental Investment Principles or sector and issue frameworks.

The Fundamental Investment Principles are applicable to all assets managed by ACTIAM itself (95% of AuM). For the remainder of the assets (which are managed externally), ACTIAM expects its external asset managers to use a responsible investment strategy that is in line with that of ACTIAM. To ensure this, ACTIAM has developed a 'third parties framework' and a policy for responsible investment in commodities and private equity. If necessary, an engagement will be set up to improve the SRI performance of external managers. For more details, please revert to the relevant section on manager selection / assets not managed in-house.

The Fundamental Investment Principles and other policies can be found on our website: <http://www.actiam.nl/en/sustainability/position-papers>.

OA 02	Mandatory	Core Assessed	PRI 6
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OA 02.1	Indicate if your responsible investment policy is publicly available.
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☒ Yes

OA 02.2	Provide a URL to your responsible investment policy.
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	URL
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<http://www.actiam.nl/en/sustainability/policy>

☐ No

OA 02.3	Indicate if your other policies or guidance documents related to responsible investment are publicly available.
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☒ Yes

☐ Yes, all

☒ Yes, some

OA 02.4	List these other policies or guidance documents related to responsible investment that are publicly available and their URLs.
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Policy or document name	URL
Investment policy natural resources industries	http://www.actiam.nl/en/sustainability/position-papers
Fundamental Investment Principles	http://www.actiam.nl/en/sustainability/position-papers
Voting Policy	http://www.actiam.nl/en/sustainability/position-papers
Responsible investment third party solutions	http://www.actiam.nl/en/sustainability/position-papers
Our position on landgrabbing	http://www.actiam.nl/en/sustainability/position-papers
Energy transition policy	http://www.actiam.nl/nl/duurzaamheid/position-papers

☐ No

OA 03	Mandatory	Core Assessed	PRI 1,2
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OA 03.1

Indicate the components/types and coverage of your responsible investment policy and guidance documents.

Select all that apply

Policy components/types	Coverage by AUM
<input checked="" type="checkbox"/> Policy setting out your overall approach <input checked="" type="checkbox"/> (Proxy) voting policy <input checked="" type="checkbox"/> Engagement/active ownership policy <input checked="" type="checkbox"/> Specific guidelines on corporate governance <input checked="" type="checkbox"/> Specific guidelines on environmental issues <input checked="" type="checkbox"/> Specific guidelines on social issues <input checked="" type="checkbox"/> Asset class-specific guidelines <input checked="" type="checkbox"/> Screening/exclusion policy <input checked="" type="checkbox"/> Other, specify sector specific policies <input type="checkbox"/> Other, specify	<input checked="" type="radio"/> Applicable policies cover all AUM <input type="radio"/> Applicable policies cover a majority of AUM <input type="radio"/> Applicable policies cover a minority of AUM

OA 04

Mandatory

Core Assessed

General

OA 04.1

Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.

☒ Yes

OA 04.2

Describe your policy on managing potential conflicts of interest in the investment process. [Optional]

There is a companywide policy on conflicts of interest and Chinese Walls. The goal of this policy is to limit the possibility of any potential conflicts of interest and respond properly if a conflict of interest does occur. Compliance to the policy is monitored by the responsible management of a business unit and an independent compliance officer. Besides that an internal audit committee provides an independent assessment on the overall effectiveness of the control measures of all business units. An example of a control measure is the development of so called 'Chinese Walls'.

☐ No

Objectives and strategies

OA 05

Mandatory

Gateway/Core Assessed

General

OA 05.1

Indicate if your organisation sets objectives for its responsible investment activities.

☒ Yes

OA 05.2

Indicate how frequently your organisation sets or revises objectives for responsible investment.

- ☒ At least once per year
☐ Less than once per year

OA 05.3

Indicate how frequently your organisation formally reviews performance against its objectives for responsible investment.

- ☒ Quarterly
☐ Biannually
☐ Annually
☐ Every two years or less
☐ It is not reviewed
☐ No

OA 06	Voluntary	Descriptive	General
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OA 06.1

List your three main responsible investment objectives you had set for the reporting year. For each, indicate any key performance indicators you set to measure your progress and also indicate your progress towards achieving your objectives.

- ☒ Add responsible investment objective 1

Objective 1	ACTIAM as responsible investment leader for its clients.
Key performance indicators	Zwitserleven and REAAL marked 1 and 2 in the VBDO Benchmark for insurers.
Describe the progress achieved	Zwitserleven 1, REAAL 2.

- ☒ Add responsible investment objective 2

Objective 2	ACTIAM as responsible investment leader for its clients.
Key performance indicators	ACTIAM as top 10 in UNPRI Report on Progress 2013 / 2015.
Describe the progress achieved	The results have not yet been published.

- ☒ Add responsible investment objective 3

Objective 3	Improve level and number of engagements.
Key performance indicators	Number of milestones achieved as explained in the active ownership module.
Describe the progress achieved	In 2014, we have engaged with ca. 30 companies, of which about a third progressed in level (to different extent, please see chapter LEA).

OA 06.2

List your three main objectives for responsible investment implementation for the next reporting year and indicate any key performance indicators you intend to use to measure your progress.

☒ Add responsible investment objective 1 for the next reporting year

Objective 1 for the next reporting year	ACTIAM as responsible investment leader for its clients.
Key performance indicators	Zwitserleven and REAAL marked 1 and 2 in the VBDO Benchmark for insurers.

☒ Add responsible investment objective 2 for the next reporting year

Objective 2 for the next reporting year	Improve level and number of engagements.
Key performance indicators	Number of milestones achieved as explained in the active ownership module.

☒ Add responsible investment objective 3 for the next reporting year

Objective 3 for the next reporting year	Further development of ESG indicators to support integrated view.
Key performance indicators	Implementation of integrated approach in active fund ranges.

Governance and human resources

OA 07	Voluntary	Descriptive	General
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OA 07.1	Provide a brief description of your organisation's governance, management structures and processes related to responsible investment.
----------------	---

The ultimate decision of ACTIAM's policies, exclusions and engagements lies in the hands of the ACTIAM Selection Committee (please check OA 01.3). The day-to-day business is operated by the ESG Research team. The ESG Research team consists of 8 people, including 2 interns. The head of the ESG Research team reports directly to the CIO of ACTIAM.

☐ I would like to attach an organisation chart (the following image formats can be uploaded: .jpg, .jpeg, .png, .bmp and .gif)

OA 08	Mandatory	Gateway/Core Assessed	General
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OA 08.1	Indicate the roles present in your organisation and for each, indicate whether they have oversight and/or implementation responsibilities for responsible investment.
----------------	---

	Roles present in your organisation
--	---

- ☐ Board members or trustees
- ☒ Chief Executive Officer (CEO), Chief Investment Officer (CIO), Investment Committee
 - ☒ Oversight/accountability for responsible investment
 - ☐ Implementation of responsible investment
 - ☐ No oversight/accountability or implementation responsibility for responsible investment
- ☒ Other Chief-level staff or head of department, specify
CCO and COO

- ☒ Oversight/accountability for responsible investment
- ☐ Implementation of responsible investment
- ☐ No oversight/accountability or implementation responsibility for responsible investment
- ☒ Portfolio managers
 - ☐ Oversight/accountability for responsible investment
 - ☒ Implementation of responsible investment
 - ☐ No oversight/accountability or implementation responsibility for responsible investment
- ☒ Investment analysts
 - ☐ Oversight/accountability for responsible investment
 - ☒ Implementation of responsible investment
 - ☐ No oversight/accountability or implementation responsibility for responsible investment
- ☒ Dedicated responsible investment staff
 - ☐ Oversight/accountability for responsible investment
 - ☒ Implementation of responsible investment
 - ☐ No oversight/accountability or implementation responsibility for responsible investment
- ☒ External managers or service providers
 - ☐ Oversight/accountability for responsible investment
 - ☒ Implementation of responsible investment
 - ☐ No oversight/accountability or implementation responsibility for responsible investment
- ☐ Other role, specify
- ☐ Other role, specify

OA 08.2	Indicate the number of dedicated responsible investment staff your organisation has. [Optional]
----------------	---

	Number
--	--------

8

OA 08.3	Additional information. [Optional]
----------------	------------------------------------

including 2 interns (on average).

CCO = Chief Commercial Officer

COO = Chief Operational Officer

OA 09	Voluntary	Additional Assessed	General
--------------	------------------	----------------------------	----------------

OA 09.1	Indicate if your organisation's performance management, reward and/or personal development processes have a responsible investment element.
----------------	---

Chief Executive Officer (CEO), Chief Investment Officer (CIO), Investment Committee

- ☒ Responsible investment KPIs and/or goals included in objectives
- ☒ Responsible investment included in appraisal process
- ☐ Variable pay linked to responsible investment performance
- ☐ Responsible investment included in personal development and/or training plan
- ☐ None of the above

Other C-level staff or head of department

CCO and COO

- ☒ Responsible investment KPIs and/or goals included in objectives
- ☒ Responsible investment included in appraisal process
- ☐ Variable pay linked to responsible investment performance
- ☐ Responsible investment included in personal development and/or training plan
- ☐ None of the above

Portfolio managers

- ☒ Responsible investment KPIs and/or goals included in objectives
- ☒ Responsible investment included in appraisal process
- ☒ Variable pay linked to responsible investment performance
- ☒ Responsible investment included in personal development and/or training plan
- ☐ None of the above

Investment analysts

- ☒ Responsible investment KPIs and/or goals included in objectives
- ☒ Responsible investment included in appraisal process
- ☒ Variable pay linked to responsible investment performance
- ☒ Responsible investment included in personal development and/or training plan
- ☐ None of the above

Dedicated responsible investment staff

- ☒ Responsible investment KPIs and/or goals included in objectives
- ☒ Responsible investment included in appraisal process
- ☒ Variable pay linked to responsible investment performance
- ☒ Responsible investment included in personal development and/or training plan
- ☐ None of the above

Promoting responsible investment

OA 10	Mandatory	Core Assessed	PRI 4,5
OA 10.1	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 you played.		

Select all that apply

☒ Principles for Responsible Investment

Your organisation's role in the initiative during the reporting period (see definitions)

- ☐ Basic
☐ Moderate
☒ Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.
[Optional]

Steering Committee member and Advisory Group member fixed income Workstream, Founding Signatory Sponsor Principles for Investors in Inclusive Finance (Impact Investing), Steering committee Fracking working group, other engagements through PRI Clearinghouse (Arctic, palm oil, labour standards in the agricultural supply chain).

☒ Asian Corporate Governance Association

Your organisation's role in the initiative during the reporting period (see definitions)

- ☒ Basic
☐ Moderate
☐ Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.
[Optional]

Member

- ☐ Association for Sustainable & Responsible Investment in Asia
☐ Australian Council of Superannuation Investors
☒ CDP Climate Change

Your organisation's role in the initiative during the reporting period (see definitions)

- ☒ Basic
☐ Moderate
☐ Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.
[Optional]

Investor signatory

- ☒ CDP Forests

	Your organisation's role in the initiative during the reporting period (see definitions)
--	--

- ☒ Basic
- ☐ Moderate
- ☐ Advanced

	Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
--	--

Investor signatory

- ☒ CDP Water

	Your organisation's role in the initiative during the reporting period (see definitions)
--	--

- ☒ Basic
- ☐ Moderate
- ☐ Advanced

	Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
--	--

Investor signatory

- ☐ CFA Institute Centre for Financial Market Integrity
- ☐ Council of Institutional Investors (CII)
- ☒ Eumedion

	Your organisation's role in the initiative during the reporting period (see definitions)
--	--

- ☐ Basic
- ☐ Moderate
- ☒ Advanced

	Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
--	--

Member (basic)& Investment committee member (advanced)

- ☒ Extractive Industries Transparency Initiative (EITI)

	Your organisation's role in the initiative during the reporting period (see definitions)
--	--

- ☐ Basic
- ☐ Moderate
- ☒ Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.
[Optional]

Alternate Board Member, Implementation Committee member, Outreach and Candidature committee member, permanent observer to the Governance Committee.

- ☐ Global Investors Governance Network (GIGN)
- ☒ Global Real Estate Sustainability Benchmark (GRESB)

Your organisation's role in the initiative during the reporting period (see definitions)

- ☒ Basic
- ☐ Moderate
- ☐ Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.
[Optional]

Member

- ☐ Institutional Investors Group on Climate Change (IIGCC)
- ☐ Interfaith Center on Corporate Responsibility (ICCR)
- ☐ International Corporate Governance Network (ICGN)
- ☐ Investor Group on Climate Change, Australia/New Zealand (IGCC)
- ☐ Investor Network on Climate Risk (INCR)/CERES
- ☐ Local Authority Pension Fund Forum
- ☒ Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify VBDO (Dutch Sif)

Your organisation's role in the initiative during the reporting period (see definitions)

- ☐ Basic
- ☐ Moderate
- ☒ Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.
[Optional]

- Financial support
- Develop position papers
- Organize workshops/meetings
- Member of steering committee analyst network

- ☐ Shareholder Association for Research and Education (Share)
- ☐ United Nations Environmental Program Finance Initiative (UNEP FI)
- ☒ United Nations Global Compact

	Your organisation's role in the initiative during the reporting period (see definitions)
--	--

- ☒ Basic
- ☐ Moderate
- ☐ Advanced

	Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
--	--

SNS Reaal is a Participant

- ☒ Other collaborative organisation/initiative, specify

Natural Capital Declaration

	Your organisation's role in the initiative during the reporting year (see definitions)
--	--

- ☒ Basic
- ☐ Moderate
- ☐ Advanced

	Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
--	--

Member / signatory

- ☒ Other collaborative organisation/initiative, specify

Green Bond Principles (GBP)

	Your organisation's role in the initiative during the reporting year (see definitions)
--	--

- ☒ Basic
- ☐ Moderate
- ☐ Advanced

	Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
--	--

Member

- ☒ Other collaborative organisation/initiative, specify

Climate Bonds Initiative (CBI)

	Your organisation's role in the initiative during the reporting year (see definitions)
--	--

- ☐ Basic
☐ Moderate
☒ Advanced

	Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
--	--

Co-organisator of investor statement regarding climate bonds. Member as of January 2015.

☒ Other collaborative organisation/initiative, specify

Verbond voor Verzekeraars (VvV)

	Your organisation's role in the initiative during the reporting year (see definitions)
--	--

- ☐ Basic
☐ Moderate
☒ Advanced

	Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
--	--

Member. Also several staff members, including the board of directors, are involved in different committees and consultative bodies at the *Verbond voor Verzekeraars*.

OA 11	Mandatory	Core Assessed	PRI 4
-------	-----------	---------------	-------

OA 11.1	Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.
---------	--

☒ Yes

OA 11.2	Indicate which of the following actions your organisation has taken to promote responsible investment, independently of collaborative initiatives.
---------	--

- ☒ Provided or supported education or training programmes for clients, investment managers, broker/dealers, investment consultants, legal advisers or other investment organisations
- ☒ Provided financial support for academic or industry research on responsible investment
- ☒ Encouraged better transparency and disclosure of responsible investment practices across the investment industry
- ☒ Spoke publicly at events and conferences to promote responsible investment
- ☒ Wrote and published in-house research papers on responsible investment
- ☒ Encouraged the adoption of the PRI
- ☒ Other, specify

Wrote columns (online, IEX.nl) and articles on responsible investment. Also in print, for example VBA Journaal, IPN Magazine, RI Insight.

☐ No

OA 12	Voluntary	Additional Assessed	PRI 4,5,6
-------	-----------	---------------------	-----------

OA 12.1	Indicate if your organisation - individually or in collaboration with others - conducted dialogue with public policy makers or standard-setters in support of responsible investment in the reporting year.
---------	---

☒ Yes

☒ Yes, individually

☒ Yes, in collaboration with others

OA 12.2	Select the methods you have used.
---------	-----------------------------------

☒ Endorsed written submissions to governments, regulators or standard-setters developed by others

☒ Drafted your own written submissions to governments, regulators or standard-setters

☒ Participated in face-to-face meetings with government members or officials to discuss policy

☐ Other, specify

OA 12.3	Where you have made written submissions (individually or collaboratively) to governments and regulatory authorities, indicate if these are publicly available.
---------	--

☒ Yes, publicly available

	provide URL
--	-------------

<http://www.degroenezaak.com/2030declaration.pdf>

	provide URL
--	-------------

<http://www.actiam.nl/nl/duurzaamheid/Documents/Investor-statement-to-IOSCO.pdf>

	provide URL
--	-------------

<http://www.actiam.nl/nl/duurzaamheid/Documents/Investor-statement-on-EU-conflict-minerals-legislation.pdf>

☐ No

☐ No

ESG issues in asset allocation

OA 13	Voluntary	Descriptive	PRI 1
-------	-----------	-------------	-------

OA 13.1	Indicate if your organisation considers ESG issues in strategic asset allocation and/or allocation of assets between geographic markets.
----------------	--

☐ Yes

☒ No

OA 14	Voluntary	Descriptive	PRI 1
--------------	------------------	--------------------	--------------

OA 14.1	Indicate if your organisation allocates assets to, or manages, funds based on specific environmental and social themed areas.
----------------	---

☒ Yes

OA 14.2	Indicate the percentage of your total AUM invested in environmental and social themed areas.
----------------	--

	% of total AUM
--	----------------

4

OA 14.3	Please specify which thematic area(s) you invest in and provide a brief description.
----------------	--

	Area
--	------

☒ Clean technology (including renewable energy)

	Asset class invested
--	----------------------

- ☐ Listed equity
- ☐ Fixed income - corporate
- ☐ Fixed income - government
- ☒ Fixed income - other
- ☐ Private debt
- ☐ Private equity
- ☐ Property
- ☐ Inclusive finance
- ☐ Cash

	Brief description of investment
--	---------------------------------

EIB Climate Awareness Bond; FMO Sustainability Bonds; NRW Bank Green Bond; etc.

☒ Green buildings

	Asset class invested
--	----------------------

- ☐ Listed equity
- ☐ Fixed income - corporate
- ☒ Fixed income - government
- ☒ Fixed income - other
- ☐ Private debt
- ☐ Private equity
- ☐ Property
- ☐ Inclusive finance
- ☐ Cash

	Brief description of investment
--	---------------------------------

Île-de-France green& sustainability bond, etc.

- ☒ Sustainable forestry

	Asset class invested
--	----------------------

- ☐ Listed equity
- ☐ Fixed income - corporate
- ☐ Fixed income - government
- ☒ Fixed income - other
- ☐ Private debt
- ☐ Private equity
- ☐ Property
- ☐ Inclusive finance
- ☐ Cash
- ☐ Sustainable agriculture
- ☒ Microfinance

	Asset class invested
--	----------------------

- ☐ Listed equity
- ☐ Fixed income - corporate
- ☐ Fixed income - government
- ☐ Fixed income - other
- ☐ Private debt
- ☐ Private equity
- ☐ Property
- ☒ Inclusive finance
- ☐ Cash

	Brief description of investment
--	---------------------------------

please check inclusive finance module

☒ SME financing

	Asset class invested
--	----------------------

- ☐ Listed equity
- ☐ Fixed income - corporate
- ☐ Fixed income - government
- ☐ Fixed income - other
- ☐ Private debt
- ☐ Private equity
- ☐ Property
- ☒ Inclusive finance
- ☐ Cash

	Brief description of investment
--	---------------------------------

please check inclusive finance module

☒ Social enterprise / community investing

	Asset class invested
--	----------------------

- ☐ Listed equity
- ☐ Fixed income - corporate
- ☐ Fixed income - government
- ☒ Fixed income - other
- ☐ Private debt
- ☐ Private equity
- ☐ Property
- ☐ Inclusive finance
- ☐ Cash

	Brief description of investment
--	---------------------------------

Council of Europe (social) bond

☒ Affordable housing

Asset class invested

- ☐ Listed equity
- ☐ Fixed income - corporate
- ☐ Fixed income - government
- ☒ Fixed income - other
- ☐ Private debt
- ☐ Private equity
- ☐ Property
- ☐ Inclusive finance
- ☐ Cash

Brief description of investment

Münchener Hypothekenbank bond.

- ☐ Education
- ☐ Global health
- ☒ Water

Asset class invested

- ☐ Listed equity
- ☐ Fixed income - corporate
- ☐ Fixed income - government
- ☒ Fixed income - other
- ☐ Private debt
- ☐ Private equity
- ☐ Property
- ☐ Inclusive finance
- ☐ Cash

Brief description of investment

NWB Bank green bond.

- ☐ Other area, specify

☐ No

Asset class implementation not reported in other modules

OA 15	Voluntary	Descriptive	General
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OA 15.1	Describe how you address ESG issues for internally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.
----------------	--

Asset Class	Describe what processes are in place and the outputs or outcomes achieved
Property	We make use of an external data provider as well as our in-house ESG Research team. For our policies, see http://www.actiam.nl/en/sustainability/position-papers and question OA 01.3.
Cash	We make use of an external data provider as well as our in-house ESG Research team. For our policies, see http://www.actiam.nl/en/sustainability/position-papers and question OA 01.3.

Innovation

OA 18	Voluntary	Descriptive	General
--------------	------------------	--------------------	----------------

OA 18.1	Indicate whether any specific features of your approach to responsible investment are particularly innovative.
----------------	--

☒ Yes

OA 18.2	Describe any specific features of your approach to responsible investment that you believe are particularly innovative.
----------------	---

In 2014, ACTIAM worked on developing a model that further integrates ESG in investment decisions. This innovative model will be (further) rolled out in 2015. Successful implementation of this model is one of the main KPIs set by the managing board.

☐ No

Assurance of responses

OA 19	Voluntary	Additional Assessed	General
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OA 19.1	Indicate whether your reported information has been reviewed, validated and/or assured by internal and/or external parties.
----------------	---

☒ Yes

OA 19.2	Indicate who has reviewed, validated and/or assured your reported information.
----------------	--

- ☒ Reviewed by Board, CEO, CIO or Investment Committee
- ☐ Validated by internal audit or compliance function
- ☐ Assured by an external independent provider, specify name

OA 19.3

Describe the steps you have taken to review, validate and/or assure the content of your reported information.

The Board (CEO, CIO, CCO, COO) reviews and approves the content of the reported information.

☐ No

ACTIAM

Reported Information

Public version

Indirect – Manager Selection, Appointment and Monitoring

PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

Overview

SAM 01	Voluntary	Descriptive	PRI 1-6
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SAM 01.1

Provide a brief description of how your organisation includes responsible investment considerations in your investment manager selection, appointment and monitoring processes.

ACTIAM holds responsible investing in high regard. This also applies to external manager selection, appointment and monitoring.

To fully appreciate ACTIAM's approach in responsible investing with regard to external managers, it is important to realize that ACTIAM has multiple clients and invests in a broad array of asset classes through external managers.

In general, we strive to get a thorough understanding of an external manager's responsible investment policy at the earliest stage in a search for an external manager. We are no proponents of declaring one best way of incorporating responsible investing, but we do encourage external managers to have a strong responsible investment strategy which they back with conviction, and which can be explained in detail to us. Managers are required to adhere to the Dutch law prohibiting investing in cluster munition.

When we seek to appoint an external manager to invest, it is a prerequisite that the manager is a PRI signatory. The rankings within the PRI reports can be a further differentiator. In the rare case where we decide against selecting a PRI signatory, our governance structure requires us to formally get clearance by going through the investment thesis thoroughly and convincing our client that other investment considerations outweigh the lack of PRI membership in this case, and that there is no alternative PRI signatory manager who we judge to be at least equally qualified.

Should we, for other reasons related to our fiduciary duties, be forced to opt for a manager with a less laudable RI profile, we choose to engage with that party. We will enter into a dialogue aimed at understanding the manager's motivations to not have high RI ambitions, and we will render our views and expectations clear, indicating what changes we would expect. In 2014 we engaged with one of the world's largest asset managers in this way, in close cooperation with one fellow asset manager out of our informal ESG network. Following our pressure, the asset manager decided to become a PRI signatory.

ACTIAM has a company-wide exclusion list. All internal investment teams will strictly refrain from investing in names on this list. We enforce or encourage external managers to adhere to this exclusion list as well. If the external investment is structured as a segregated mandate, we enforce adherence to our exclusion list. If the investment vehicle is a mutual fund, we are bound by the broader investment guidelines set for the fund. We will still point out the importance of avoiding investment in the names on our exclusion list, but enforcement in this case is legally impossible.

We feel active ownership is an integral part of being a responsible investment manager. Hence, we require external managers to vote proxies and to engage on our behalf. For segregated accounts, we vote the stocks in managers' portfolios ourselves (supported by a service provider) directly, according to our in-house ESG voting policy. On a regular basis, we evaluate the outcome of the voting process and the current strategy and results of engagement activities.

Responsible investing is fully integrated in our monitoring process. Our policy is to have a minimum of four contact moments every year with every external manager in our portfolio, preferably at least two of which are face-to-face meetings. In practice, the frequency of interaction is typically exceeding the minimum requirement. ESG / responsible investing is a topic at every monitoring meeting.

We have chosen to restrict investment in commodities due to responsible investment considerations. Rising prices of basic commodities can have serious consequences for poor people depending on these commodities. As research cannot fully take away doubts about investors' alleged contributions to such price rises, ACTIAM chooses to abstain from derivatives exposure to commodities.

For further detail on our external manager responsible investing policy please check our website: <http://www.actiam.nl/en/sustainability/position-papers>.

SAM 02	Mandatory	Core Assessed	PRI 4
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SAM 02.1

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

☐ Yes

☒ No

SAM 03**Mandatory****Gateway****General****SAM 03.1**

Indicate for which of the following externally managed asset classes your organisation, and/or your investment consultants, consider responsible investment factors in investment manager: (a) Selection, (b) Appointment (investment management agreements/contracts), and (c) Monitoring

Select all that apply

Asset classes	(a) Selection	(b) Appointment	(c) Monitoring
Listed equity	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Fixed income - corporate	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Fixed income - government	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Fixed income - other	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Private equity	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Private debt	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Property	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Listed equity (LE), fixed income corporate (FIC) and fixed income government (FIG)
Overview**SAM 04****Mandatory to Report Voluntary to Disclose****Gateway/Peering****General****SAM 04.1**

Provide a breakdown of your externally managed listed equities, corporate fixed income and government fixed income by passive, active quant, active fundamental and other active strategies.

Listed equity (LE)

Type of strategy	As % of externally managed listed equity
Passive	<input type="radio"/> 0% <input type="radio"/> <10% <input checked="" type="radio"/> 10-50% <input type="radio"/> >50%
Active - quantitative (quant)	<input type="radio"/> 0% <input checked="" type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
Active - fundamental and other active	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50%

Fixed income - corporate (FIC)

Type of strategy	As % of externally managed corporatefixed income
Passive	<input checked="" type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
Active - quantitative (quant)	<input checked="" type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
Active - fundamental and other active	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50%

Fixed income - government (FIG)

Type of strategy	As % of externally managed government fixed income
Passive	<input checked="" type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
Active - quantitative (quant)	<input checked="" type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
Active - fundamental and other active	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50%

SAM 05	Mandatory	Gateway	PRI 1,2
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SAM 05.1	Indicate which of the following ESG incorporation strategies you encourage or require your external manager(s) to implement on your behalf:
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	Active investment strategies
--	------------------------------

Active investment strategies	LE	FIC	FIG
Screening	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Thematic	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Integration	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Passive investment strategies
--	-------------------------------

Passive investment strategies	LE		
Screening	<input checked="" type="checkbox"/>		
Thematic	<input type="checkbox"/>		
Integration	<input type="checkbox"/>		
None of the above	<input type="checkbox"/>		

SAM 05.2

Indicate if - on your externally managed assets - you engage directly, via service providers, or via your external manager.

	LE	FIC
We engage directly or via service providers on our externally managed assets	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We require our external managers to engage on our behalf	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>

SAM 05.3

Indicate if - on your externally managed listed equities - you cast your (proxy) votes directly, via service providers, or via your external manager.

	LE
We cast our (proxy) votes directly or via service providers on our externally managed assets	<input checked="" type="checkbox"/>
We require our external managers to cast our (proxy) votes on our behalf	<input checked="" type="checkbox"/>
None of the above	<input type="checkbox"/>

Selection
SAM 06
Mandatory
Core Assessed
PRI 1-6
SAM 06.1

Indicate whether your organisation, and/or your investment consultant, in the manager selection process for listed assets, typically do any of the following:

General

	LE	FIC	FIG
Review the manager's responsible investment policies	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Discuss managers' governance and management of responsible investment activities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Meet staff with responsible investment responsibilities to assess their skills and competence	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Discuss minimum responsible investment expectations that managers must meet	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Discuss the role managers have played in collaborative initiatives	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Ask whether the organisation is a signatory to the PRI and/or other relevant organisations	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Review the manager's responsible investment reporting to clients and/or the public, including PRI reporting	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Discuss the type of ESG reporting you expect	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Assign specific weighting to ESG factors in your manager evaluation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other general aspects in your selection process, specify	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ESG incorporation

	LE	FIC	FIG
Evaluate the quality and coverage of ESG research used by managers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Assess how the manager incentivises brokers to provide ESG research	<input checked="" type="checkbox"/>	n/a	n/a
Assess managers' ESG incorporation strategies and ability to identify and manage ESG issues	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Discuss with managers how ESG issues have impacted specific investment decisions and, where relevant, stock or portfolio performance	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Evaluate index providers' ESG incorporation when designing the index	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other ESG incorporation issues in your selection process, specify	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Engagements

	LE	FIC
Discuss the managers' engagement processes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Discuss the role managers have played in influencing companies' ESG practices and performance	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Discuss how information gained through engagement is incorporated into investment decision-making	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other engagement issues in your selection process, specify	<input type="checkbox"/>	<input type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>

(Proxy) voting

	LE
Discuss the managers' voting processes	<input checked="" type="checkbox"/>
Discuss how information gained through research for (proxy) voting is used in investment-decision making	<input checked="" type="checkbox"/>
Other (proxy) voting issues in your selection process, specify	<input type="checkbox"/>
None of the above	<input type="checkbox"/>

Appointment

SAM 07	Voluntary	Additional Assessed	PRI 4
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SAM 07.1	When appointing managers, indicate which of the following responsible investment considerations your organisation typically includes in investment management agreements/contracts for your listed assets:
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	General
--	---------

	LE	FIC	FIG
Acting in accordance with your organisation's overall investment beliefs or policy on responsible investment and ESG issues	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other general RI considerations in investment management agreements, specify	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	ESG incorporation
--	-------------------

	LE	FIC	FIG
Specific requirements relating to the incorporation of ESG issues into investment decision-making	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other RI considerations relating to ESG incorporation in investment management agreements, specify	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Engagement

	LE	FIC
Specific requirements relating to engagement	<input type="checkbox"/>	<input type="checkbox"/>
Other RI considerations relating to engagement in investment management agreements, specify	<input type="checkbox"/>	<input type="checkbox"/>
None of the above	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(Proxy) voting

	LE
Specific requirements relating to (proxy) voting	<input checked="" type="checkbox"/>
Other RI considerations relating to (proxy) voting in investment management agreements, specify	<input type="checkbox"/>
None of the above	<input type="checkbox"/>

Reporting

	LE	FIC	FIG
Reporting on the agreed responsible investment activities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Reporting on the ESG characteristics of the portfolio	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Reporting on the impact of ESG issues on financial performance	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other RI considerations relating to reporting in investment management agreements, specify	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Monitoring			
SAM 08	Mandatory	Core Assessed	PRI 1

SAM 08.1

Indicate whether your organisation, and/or your investment consultant, in the dialogue and monitoring of your external manager typically do any of the following:

General

	LE	FIC	FIG
Include responsible investment as a standard agenda item at performance review meetings	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Highlight examples of good responsible investment practice by other managers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Review the manager's responsible investment reporting, for example PRI-generated responsible investment reports	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Encourage your managers to consider joining responsible investment initiatives/organisations or participate in collaborative projects with other investors	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Include responsible investment criteria as a formal component of overall manager performance evaluation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Request information on whether your manager's approach to ESG issues has impacted financial performance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Request information on whether your manager's approach to ESG issues has impacted risk or volatility	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Request information on whether your manager's approach to ESG issues has impacted ESG performance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other general aspects of your monitoring, specify	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ESG incorporation

	LE	FIC	FIG
Request information on ESG incorporation in specific investment decisions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other ways you monitor ESG incorporation, specify	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Engagements

	LE	FIC
Review the ESG information relevant to the engagements	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Discuss the number of engagements and their comprehensiveness	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Discuss the type of role played (i.e. leading or supporting)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Review the progress of ongoing engagements and/or outcomes of completed engagements	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other ways you monitor engagement activities, specify	<input type="checkbox"/>	<input type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>

(Proxy) voting

	LE
Review the number or percentage of votes cast	<input checked="" type="checkbox"/>
Request an explanation of reasons for votes cast	<input checked="" type="checkbox"/>
Discuss whether companies were informed of the reasons for votes against management recommendations or abstentions/withheld votes	<input checked="" type="checkbox"/>
Review the number of resolutions on ESG issues filed or co-filed	<input checked="" type="checkbox"/>
Discuss the changes in company practice (outcomes) that have been achieved from voting activities	<input checked="" type="checkbox"/>
Other ways you monitor (proxy) voting activities, specify	<input type="checkbox"/>
None of the above	<input type="checkbox"/>

If you select any 'Other' option(s), specify

Evaluate results in PRI (pilot) assessment report.

SAM 09

Mandatory

Core Assessed

PRI 2

SAM 09.1

For the listed equities where you have given your external managers a (proxy) voting mandate, indicate the approximate percentage (+/- 5%) of votes that were cast during the reporting year.

- ☐ We track or collect this information
- ☒ We do not track or collect this information

Private equity (PE), property (PR) and infrastructure (INF) - non-listed assets

Selection

SAM 10**Mandatory****Core Assessed****PRI 1-6****SAM 10.1**

Indicate whether your organisation, and/or your investment consultant, in the dialogue and monitoring of your external manager typically do any of the following:

General

	PE	PR	
Review the manager's/general partner's responsible investment policy	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Discuss the manager's governance and management of responsible investment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Meet staff with responsible investment responsibilities to assess their skills and competence	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Discuss minimum responsible investment expectations that managers must meet	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Discuss the role managers have played in collaborative initiatives	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Ask whether the organisation is a signatory to the PRI and/or other relevant organisations	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Assess the external manager's reporting and how it will help you to monitor that it is acting consistent with the agreed-upon ESG-related policies and practices during the life of the fund	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Review the manager's responsible investment disclosure, including PRI reporting	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Assign specific weighting to ESG factors in your manager evaluation	<input type="checkbox"/>	<input type="checkbox"/>	
Other general aspects in your selection process, specify	<input type="checkbox"/>	<input type="checkbox"/>	
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	

Investment selection (pre-investment) of underlying holding

	PE	PR	
Assess the manager's policies, processes and systems for identifying ESG-related value drivers and managing material ESG-related risks pre-investment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Other pre-investment aspects reviewed in your selection process, specify	<input type="checkbox"/>	<input type="checkbox"/>	
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	

Investment monitoring (post-investment) of underlying holding

	PE	PR	
Understand if and how the manager influences and supports its portfolio companies'/assets' management of ESG-related risks and pursuit of ESG-related opportunities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Discuss examples of how managers have previously identified and addressed ESG issues in their portfolios on an ongoing basis	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Assess the manager's/general partner's approach to managing and disclosing material incidents at the manager / General Partner and underlying holdings	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Other post-investment aspects reviewed in your selection process, specify	<input type="checkbox"/>	<input type="checkbox"/>	
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	

Appointment

SAM 11	Voluntary	Additional Assessed	PRI 4
SAM 11.1	When appointing managers, indicate which of the following responsible investment considerations your organisation typically includes in agreements/fund formation contracts for your non-listed assets:		
	General		

	PE	PR	
Acting in accordance with your organisation's overall investment beliefs or policy on responsible investment and ESG issues	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Other general RI considerations in your agreements, specify	<input type="checkbox"/>	<input type="checkbox"/>	
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	

Investment selection (pre-investment) of underlying holding

	PE	PR	
Specific requirements relating to how ESG issues are identified and managed in investment decision-making	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Other RI considerations relating to investment selection in your agreements, specify	<input type="checkbox"/>	<input type="checkbox"/>	
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	

Investment monitoring (post-investment) of underlying holding

	PE	PR	
Specific requirements relating to the manager supporting or influencing the underlying holdings' management of ESG factors	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Other RI considerations relating to investment monitoring in your agreements, specify	<input type="checkbox"/>	<input type="checkbox"/>	
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	

Reporting

	PE	PR	
Reporting on the agreed ESG implementation activities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Reporting on the ESG characteristics of the portfolio	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Reporting on company incidents relating to ESG issues	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Reporting on the impact of ESG issues on financial performance	<input type="checkbox"/>	<input type="checkbox"/>	
Other RI considerations relating to reporting in your agreements, specify	<input type="checkbox"/>	<input type="checkbox"/>	
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	

Monitoring

SAM 12	Mandatory	Core Assessed	PRI 1-6
SAM 12.1	Indicate whether your organisation, and/or your investment consultant, in the dialogue and monitoring of your external manager, typically do any of the following:		
	General		

	PE	PR	
Include responsible investment as a standard agenda item at performance review meetings	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Highlight examples of good responsible investment practice by other managers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Review manager's responsible investment reporting, for example PRI-generated responsible investment reports	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Encourage your managers to consider joining responsible investment initiatives or organisations or participate in collaborative projects with other investors	<input type="checkbox"/>	<input type="checkbox"/>	
Include responsible investment criteria as a formal component of overall manager performance evaluation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Request information on whether your manager's approach to ESG issues has impacted financial performance	<input type="checkbox"/>	<input type="checkbox"/>	
Request information on whether your manager's approach to ESG issues has impacted ESG performance	<input type="checkbox"/>	<input type="checkbox"/>	
Other general aspects of your monitoring, specify	<input type="checkbox"/>	<input type="checkbox"/>	
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	

Investment selection (pre-investment) of underlying holding

	PE	PR	
Discuss how the analysis of ESG issues affected investment decisions during the reporting period	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Other ways ESG issues are incorporated in the pre-investment process, specify	<input type="checkbox"/>	<input type="checkbox"/>	
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	

Investment monitoring (post-investment) of underlying holding

	PE	PR	
Request reports on the ESG characteristics of the manager's underlying holdings and discuss related developments that may impact holdings in the fund	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Request examples of ESG issues identified within the portfolio and action taken in response	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Request details of how ESG factors were considered when preparing to exit from investments	<input type="checkbox"/>	<input type="checkbox"/>	
Other ways ESG issues are monitored in the post-investment process, specify	<input type="checkbox"/>	<input type="checkbox"/>	
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	

Other asset classes

SAM 13	Voluntary	Descriptive	PRI 1-6
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SAM 13.1	Describe how your organisation, and/or your investment consultants, address responsible investment factors in manager selection, appointment and/or monitoring process for the following asset classes:
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Asset Class	Description
Fixed income - other	Please see question SAM01.1
Private debt	Please see question SAM01.1

Outputs and outcomes

SAM 14	Mandatory to Report Voluntary to Disclose	Descriptive	PRI 1-6
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SAM 14.1	Indicate approximately what percentage (+/- 10%) of your externally managed assets are managed by PRI signatories.
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	%
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95

SAM 14.2	Additional information. [Optional]
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We managed to increase this number to 95% because a major asset manager with whom we engaged last year became a PRI signatory. The remaining 5% (AuM that is not covered by PRI signatories) is managed by alternative managers. These are older investments; with any new investment through external managers it is a prerequisite that the external manager is a PRI signatory.

SAM 15	Voluntary	Descriptive	PRI 2
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SAM 15.1	Provide examples of how ESG issues have been addressed in the manager selection, appointment and/or monitoring process for your organisation during the reporting year.
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☒ Add Example 1

Topic or issue	Engagement with large asset manager to become PRI signatory
Conducted by	<input checked="" type="checkbox"/> Internal staff
Asset class	<input type="checkbox"/> All asset classes <input checked="" type="checkbox"/> Listed Equity <input type="checkbox"/> Fixed income – corporate bonds <input type="checkbox"/> Fixed income – government bonds <input type="checkbox"/> Private equity <input type="checkbox"/> Property <input type="checkbox"/> Fixed income - other <input type="checkbox"/> Private debt
Scope and process	We have engaged with a large asset manager in 2014. Our goal was for the asset manager to become a PRI signatory.
Outcomes	The asset manager became a PRI signatory in 2014.

☒ Add Example 2

Topic or issue	Further ESG integration in external manager selection.
Conducted by	<input checked="" type="checkbox"/> Internal staff
Asset class	<input checked="" type="checkbox"/> All asset classes <input type="checkbox"/> Listed Equity <input type="checkbox"/> Fixed income – corporate bonds <input type="checkbox"/> Fixed income – government bonds <input type="checkbox"/> Private equity <input type="checkbox"/> Property <input type="checkbox"/> Fixed income - other <input type="checkbox"/> Private debt
Scope and process	We have been working on further ESG-integration in the manager selection process.
Outcomes	ESG was further integrated in the manager selection process in 2014. We have selected one new external manager in 2014, and ESG criteria were considered in this process.

☐ Add Example 3

☐ Add Example 4

☐ Add Example 5

Communication

SAM 16	Mandatory	Core Assessed	PRI 6
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SAM 16.1	Indicate if your organisation proactively discloses any information about responsible investment considerations in your indirect investments.
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☒ Yes, we disclose information publicly

provide URL

http://www.actiam.nl/nl/duurzaamheid/Documents/Position_Paper_Third_Parties.pdf

provide URL

<http://www.actiam.nl/nl/producten-en-diensten/fondsbeheer>

SAM 16.2

Indicate if the level of information you disclose to the public is the same as that disclosed to clients and/or beneficiaries.

☒ Yes

SAM 16.3

Indicate what type of information your organisation proactively discloses to the public and clients and/or beneficiaries about your indirect investments.

☒ How responsible investment considerations are included in manager selection, appointment and monitoring processes

☒ Details of the responsible investment activities carried out by managers on your behalf

☐ E, S and/or G impacts and outcomes that have resulted from your managers' investments and active ownership

☐ Other, specify

☐ No

☐ Yes, we disclose information to clients/beneficiaries only

☐ We do not proactively disclose information to the public and/or clients/beneficiaries

ACTIAM

Reported Information

Public version

Direct - Listed Equity Incorporation

PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

Overview

LEI 01	Mandatory to Report Voluntary to Disclose	Gateway/Peering	PRI 1
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LEI 01.1	Provide a breakdown of your internally managed listed equities by passive, quantitative, fundamental and other active strategies. For strategies that account for less than 10% of your internally managed listed equities, indicate if you would still like to report your activities.
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Strategies

☒ Passive

	% of internally managed listed equities
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- ☐ <10%
☒ 10-50%
☐ >50%

☒ Active – quantitative (quant)

	% of internally managed listed equities
--	---

- ☐ <10%
☒ 10-50%
☐ >50%

☒ Active – fundamental and other active strategies

	% of internally managed listed equities
--	---

- ☐ <10%
☒ 10-50%
☐ >50%

LEI 02	Voluntary	Descriptive	PRI 1
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LEI 02.1	Provide a brief overview of how you incorporate ESG issues into listed equity investments.
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At ACTIAM we use several ESG strategies for both actively and passively managed funds. All our funds are screened based on a norms-based screening. The norms we adhere to are laid down in our Fundamental Investment Principles (this will be further explained in module 5 on Listed Equity Active Ownership). The screening is performed by an external data provider and by ACTIAM's own ESG research department. When a company does not comply with the Fundamental Investment Principles, exclusion is probable, but not necessary. Dependent on the character and magnitude of the violation, ACTIAM first enters into a constructive dialogue ('engagement') with the company. As explained in question OA 01.3, the ACTIAM Selection Committee will decide to either exclude a company or start an engagement with a company. ACTIAM, in cooperation with the London-based GES, also makes use of the right to vote on shareholder meetings for all stocks in the funds.

For the Euro Aandelenfonds (one of our flagship Equity products managed internally), ACTIAM also applies a so called best-in-class approach on top of the norms-based screening described above. The in-house ESG analysts determine the top 40% best performing companies per sector weighted at ESG domain (based on several indicators). In this process the in house ESG analysts assess the ACTIAM ESG sector weightings on the basis of relevant sector-specific issues. For example, for the retail sector a responsible supplier policy is of importance; or

compliance with human rights, labour rights and environmental standards in the mining sector. Companies that are not selected as best-in-class but do have a distinct sustainable character can be selected for investment as well. An engagement will be set up with these companies in order to improve their overall E, S and G performance.

ESG incorporation in actively managed listed equities

Implementation processes

LEI 03	Mandatory	Gateway/Core Assessed	PRI 1
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LEI 03.1

Indicate (1) which ESG incorporation strategy and/or combination of strategies you apply to your actively managed listed equities and (2) the breakdown of your actively managed listed equities by strategy or combination of strategies.

ESG incorporation strategy (select all that apply)

- ☐ Screening alone (i.e. not combined with any other strategies)
- ☐ Thematic alone (i.e. not combined with any other strategies)
- ☐ Integration alone (i.e. not combined with any other strategies)
- ☐ Screening + Integration strategies
- ☐ Thematic + integration strategies
- ☐ Screening + thematic strategies
- ☒ All three strategies combined

Percentage of actively managed listed equities to which each strategy or combination of strategies is applied - you may (estimate +/- 10%)	<div> <div></div> <div>%</div> </div> 100
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- ☐ No incorporation strategies applied

Total actively managed listed equities

100%

LEI 03.2

Describe your primary reasons for choosing a particular ESG incorporation strategy.

We have chosen to use a combination of all three strategies because they facilitate the selection of the best performing companies per sector (Best-in-Class). We use a screening strategy to screen our investment universe for companies violating our Fundamental Investment Principles. We subsequently exclude or start engagement with these companies. A combination of integration and thematic strategies enables us to select the best performing companies per sector as well as companies with a distinct sustainable character (thematic) that we engage with to improve their integrated ESG and financial performance.

LEI 03.3

Where assets are managed using a combination of ESG incorporation strategies, briefly describe how these combinations are used. [Optional]

The active fund incorporates two strategies. We first screen the investment universe and exclude any company that does not comply with our Fundamental Investment Principles (please check LEI 02.1 for more info). The remaining companies in the investment universe are allocated a score based on their performance on E, S and G policies, management systems and controversies. Subsequently, for each sector we rank companies within that sector on the basis of the 40% Best in Class principle.

Next to that we select companies who fall out of the top 40% selection but who do have a distinct sustainable profile. This process is called positive selection and consists of four separate steps. To start with, the portfolio managers and ESG Research analysts will combine their forces to find companies that will meet sustainability criteria as well as basic financial criteria. Typically new company ideas emerge from either sector reviews that are performed on a regular basis or from daily news flow and sell-side research. After first screens for sustainable company activities (social or environmental beneficial activities such as wind and solar energy generation), ESG Research will determine the company's level of disclosure, its ESG performance, and its strengths and weaknesses. Similarly, the portfolio managers will do a review of the company's financial situation (focusing on the company's size and liquidity of the stock). If both of the screens result in a positive conclusion, the company will be reviewed in greater detail and subjects for engagement will be identified on both ESG as well as on the financial end. One should bear in mind, however, that since the initial research phase generally shows gaps in the information disclosed by the company, a high(er) level of transparency towards stakeholders can be a typical engagement objective to start from. Depending on the outcomes of such disclosure, a further, more precise definition of objectives may be possible as the dialogue progresses. Finally, after inclusion in the portfolio, the responsible ESG analysts and portfolio managers will jointly start engagement to address the subjects they found earlier and check if and how progress can be made in those areas. Company visits, conference calls or similar can be part of the applied instruments to keep engagement going. Progress will be reported to the ACTIAM Selection Committee as engagement develops.

LEI 04**Voluntary****Additional Assessed****PRI 1****LEI 04.1**

Indicate what ESG information you use in your ESG incorporation strategies and who provides this information.

Type of ESG information

- ☒ Raw ESG company data

Indicate who provides this information

- ☒ ESG research provider
☒ Sell-side
☒ In-house – specialised ESG analyst or team
☐ In-house – analyst or portfolio manager

- ☒ Company-related analysis or ratings

Indicate who provides this information

- ☒ ESG research provider
☒ Sell-side
☒ In-house – specialised ESG analyst or team
☒ In-house – analyst or portfolio manager

- ☒ Sector-related analysis or ratings

Indicate who provides this information

- ☒ ESG research provider
- ☒ Sell-side
- ☒ In-house – specialised ESG analyst or team
- ☐ In-house – analyst or portfolio manager
- ☒ Country-related analysis or ratings

Indicate who provides this information

- ☒ ESG research provider
- ☐ Sell-side
- ☒ In-house – specialised ESG analyst or team
- ☐ In-house – analyst or portfolio manager
- ☒ Screened stock list

Indicate who provides this information

- ☒ ESG research provider
- ☐ Sell-side
- ☒ In-house – specialised ESG analyst or team
- ☐ In-house – analyst or portfolio manager
- ☒ ESG issue-specific analysis or ratings

Indicate who provides this information

- ☒ ESG research provider
- ☒ Sell-side
- ☒ In-house – specialised ESG analyst or team
- ☐ In-house – analyst or portfolio manager
- ☐ Other, specify

LEI 04.2

Provide a brief description of the ESG information used, highlighting any differences of sources of information across your ESG incorporation strategies.

ACTIAM uses a data provider as a supplement to its own in-house research. For both screening and integration we use all the above mentioned sources although one more than the other. The 'screened stock list' for instance is only used for our actively managed best-in-class fund, while the rest of the resources is used in all the actively and passively managed funds.

LEI 04.3

Indicate if you incentivise brokers to provide ESG research.

- ☒ Yes

LEI 04.4	Describe how you incentivise brokers.
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ESG is a component of our broker evaluation process which determines the allocation of commissions to brokers. In 2014 we also determined a set of key ESG issues and suggested them to brokers for research and meetings with companies. Based on the relevance of the research and meetings provided and the overall ESG score of the financial institution, the brokers will receive a score at the end of each year which will impact the overall broker score and the allocation of commissions to brokers.

☐ No

LEI 05	Voluntary	Additional Assessed	PRI 1
---------------	------------------	----------------------------	--------------

LEI 05.1	Indicate if your organisation has a process through which information derived from ESG engagement and/or (proxy) voting activities is made available for use in investment decision-making.
-----------------	---

☒ Engagement

☒ We have a systematic process to ensure the information is made available.

☐ We occasionally make this information available.

☐ We do not make this information available.

☒ (Proxy) voting

☒ We have a systematic process to ensure the information is made available.

☐ We occasionally make this information available.

☐ We do not make this information available.

(A) Implementation: Screening

LEI 06	Mandatory	Descriptive	PRI 1
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LEI 06.1	Indicate and describe the type of screening you apply to your internally managed active listed equities.
-----------------	--

Type of screening

☒ Negative/exclusionary screening

Screened by

☒ Product

☒ Activity

☐ Sector

☐ Country/geographic region

☒ Environmental and social practices and performance

☒ Corporate governance

	Description
--	-------------

Our data provider executes an exclusionary screening every quarter, based on our Fundamental Investment Principles which incorporate Environmental, Social and Governance Issues. In addition, our inhouse ESG research team researches companies on a case-by-case and ongoing basis. We exclude several products and activities, for instance nuclear weapons or *riverine tailings disposal*.

- ☒ Positive/best-in-class screening

Screened by

- ☒ Product
- ☒ Activity
- ☒ Sector
- ☐ Country/geographic region
- ☒ Environmental and social practices and performance
- ☒ Corporate governance

	Description
--	-------------

Please check LEI 02.1 for more information on our Best-in-class fund and screening.

- ☒ Norms-based screening

Screened by

- ☒ UN Global Compact Principles
- ☒ Universal Declaration of Human Rights
- ☒ International Labour Organization Conventions
- ☒ United Nations Convention Against Corruption
- ☒ OECD Guidelines for Multinational Enterprises
- ☒ Other, specify

Please check the list of other international mechanisms we consult as an appendix to our Fundamental Investment Principles on our website: <http://www.actiam.nl/en/sustainability/position-papers>.

	Description
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Our Fundamental Investment Principles are based on international treaties, conventions and best practices.

LEI 06.2

Describe how the screening criteria are established, how often the criteria are reviewed and how you notify clients and/or beneficiaries when changes are made.

Screening criteria (Fundamental Investment Principles) are established by the in-house ESG team in close collaboration with our clients and are reviewed every quarter. The final decision to approve a change in the Fundamental Investment Principles lies in the hands of the ACTIAM Selection Committee. The ACTIAM Selection Committee meets 4 times a year and decides, among other things, on the eligibility of investments and revisions of the Fundamental Investment Principles. This decision and policy-making body comprises four members: the CEO, performing the role of Chair; the CIO; the Head of the ESG Research team; and the Head of Impact Investing. After each ACTIAM Selection Committee meeting clients are informed on the decisions made.

LEI 07**Mandatory****Core Assessed****PRI 1****LEI 07.1**

Indicate which processes your organisation uses to ensure that screening is based on robust analysis.

- ☒ Comprehensive ESG research is undertaken or sourced to determine companies' activities and products.
- ☒ Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- ☒ External research and data used to identify companies to be excluded/included is subject to internal audit by ESG/RI staff, the internal audit function or similar
- ☒ Company ESG information/ratings are updated regularly to ensure that portfolio holdings comply with fund policies
- ☒ A committee or body with representatives independent of the individuals who conduct company research reviews some or all screening decisions
- ☒ A periodic review of the quality of the research undertaken or provided is carried out
- ☐ Other, specify
- ☐ None of the above

LEI 08**Voluntary****Additional Assessed****PRI 1****LEI 08.1**

Indicate which processes your organisation uses to ensure that fund criteria are not breached

- ☒ Checks are performed to ensure that stocks meet the funds' screening criteria. These checks are:
 - ☒ Systematic
 - ☐ Occasional
- ☐ Automated IT systems prevent investment managers from investing in excluded stocks or those that do not meet positive screening criteria.
- ☒ Audits of fund holdings are undertaken regularly by internal audit function
- ☐ Other, specify
- ☐ None of the above

LEI 08.2

If breaches of fund screening criteria are identified - describe the process followed to correct those breaches.

ACTIAM's governance is organised according to the 'three lines of defence'- model. The first line (portfolio management) is the risk owner and responsible for first line risk controls. Mandate restrictions are monitored automatically by the second line on a daily basis. In the event of a breach, the second line risk manager will investigate the cause of the breach as soon as the breach is discovered. In case of a passive breach, portfolio management will realign the portfolio vis-à-vis the benchmark portfolio. In case of an active breach (an excluded security is accidentally purchased), portfolio management must sell the security immediately. The client will be informed about the event and will be compensated according to ACTIAM's compensation policy to the extent any losses have arisen. Any profits remain with the client however..

LEI 08.3

Additional information.

If the security is the outcome of a corporate action, the security will be sold when the corporate action is physically settled.

(B) Implementation: Thematic

LEI 09**Mandatory****Descriptive****PRI 1****LEI 09.1**

Indicate the type of sustainability thematic funds or mandates that your organisation manages.

- ☐ Environmentally themed funds
- ☐ Socially themed funds
- ☒ Combination of themes

LEI 09.2

Describe your organisation's processes for sustainability themed funds. [Optional]

See questions LEI 03.2 and LEI 03.3.

(C) Implementation: Integration of ESG issues

LEI 10**Voluntary****Descriptive****PRI 1****LEI 10.1**

Describe how you integrate ESG factors into investment decision making processes.

ACTIAM has a longstanding history incorporating the ESG considerations into all of its investment processes. As such, in depth specialist sector and theme knowledge and experience is present.

Making optimal use of the existing bodies of knowledge of ESG and portfolio management expertise, we are taking the integration one step further by consistently applying a ESG ranking methodology for all investment classes covered, both portfolios and benchmarks. This methodology, currently being rolled out, has been jointly developed by our ESG specialists and debt and equity portfolio managers as well as manager selection.

Applying this framework will facilitate and assure balanced investment decisions, taking into account both financial and non-financial aspects of any investment. It allows evaluation of the ESG active positions of portfolios relative to the benchmark and can be used in developing client specific ESG strategies with positive ESG biases.

Furthermore, ESG specialists and portfolio managers closely work together in the engagement of companies invested in, formulating sector specific views and reviews of the portfolios managed relative to its benchmark (see, for example, LEI 03.3).

LEI 11	Mandatory	Core Assessed	PRI 1
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LEI 11.1	Indicate if E, S and G issues are reviewed while researching companies and/or sectors in active strategies.
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ESG issues	Coverage/extent of review on these issues
Environmental	<input checked="" type="radio"/> We systematically review the potential significance of environmental issues and investigate them accordingly <input type="radio"/> We occasionally review the potential significance of environmental issues and investigate them accordingly <input type="radio"/> We do not review environmental issues
Social	<input checked="" type="radio"/> We systematically review the potential significance of social issues and investigate them accordingly <input type="radio"/> We occasionally review the potential significance of social issues and investigate them accordingly <input type="radio"/> We do not review social issues
Corporate Governance	<input checked="" type="radio"/> We systematically review the potential significance of corporate governance issues and investigate them accordingly <input type="radio"/> We occasionally review the potential significance of corporate governance issues and investigate them accordingly <input type="radio"/> We do not review corporate governance issues

LEI 12	Voluntary	Additional Assessed	PRI 1
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LEI 12.1	Indicate which processes your organisation uses to ensure that ESG integration is based on a robust analysis.
----------	---

- ☒ Comprehensive ESG research is undertaken or sourced to determine companies' activities and products
- ☒ Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- ☒ Company information and/or ratings on ESG are updated regularly
- ☒ A periodic review of the quality of the research undertaken or provided is carried out
- ☐ Other, specify
- ☐ None of the above

LEI 12.2

Describe how ESG information is held and used by your portfolio managers.

- ☒ ESG information is held within centralised databases or tools and it is accessible by all relevant staff
- ☒ ESG information or analysis is a standard section or aspect of all company research notes or industry/sector analysis generated by investment staff
- ☒ Systematic records are kept that capture how ESG information and research was incorporated into investment decisions
- ☐ Other, specify
- ☐ None of the above

LEI 13**Mandatory to Report Voluntary to Disclose****Core Assessed****PRI 1****LEI 13.1**

Indicate into which aspects of investment analysis you integrate ESG information.

- ☐ (Macro) economic analysis
- ☒ Industry analysis
 - ☒ Systematically
 - ☐ Occasionally
- ☒ Analysis of company strategy and quality of management
 - ☒ Systematically
 - ☐ Occasionally
- ☒ Idea generation
 - ☐ Systematically
 - ☒ Occasionally
- ☒ Portfolio construction
 - ☒ Systematically
 - ☐ Occasionally
- ☒ Fair value/fundamental analysis
 - ☐ Systematically
 - ☒ Occasionally

LEI 13.2

Indicate which methods are part of your process to integrate ESG information into fair value/fundamental analysis.

- ☐ Adjustments to income forecasts (sales, earnings, cash flows)
- ☐ Adjustments to valuation tools (discount rates, return forecasts, growth rates)
- ☒ Other adjustments to fair value projections, specify
No adjustments to fair values or forecasts.
- ☒ Other, specify
Companies excluded from any kind of investments (exclusions) based on our fundamental ESG principles
 - ☒ Systematically
 - ☐ Occasionally

ESG incorporation in passively managed listed equities

LEI 14	Mandatory to Report Voluntary to Disclose	Descriptive	PRI 1
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LEI 14.1	Indicate if you manage passive listed equity funds that incorporate ESG issues in the index construction methodology.
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☒ Yes

LEI 14.2	Indicate the percentage of your total passive listed equity funds for which ESG issues are incorporated in the index construction methodology.
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	(% of total passive listed equity funds)
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- ☐ <10%
☐ 10-50%
☐ 51-90%
☒ >90%

LEI 14.3	Specify index/fund name, provide a brief description of ESG methodology and indicate which of the following ESG incorporation strategies you apply.
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☒ Index/fund 1

Index/fund name and brief description of ESG methodology	ESG incorporation strategy
ACTIAM Responsible Index Fund Equity Europe (BFGR)	<input checked="" type="checkbox"/> Screening <input type="checkbox"/> Thematic <input type="checkbox"/> Integration of ESG issues <input checked="" type="checkbox"/> Other

☒ Index/fund 2

Index/fund name and brief description of ESG methodology	ESG incorporation strategy
ACTIAM Responsible Index Fund Equity Europe - A (BFGR)	<input checked="" type="checkbox"/> Screening <input type="checkbox"/> Thematic <input type="checkbox"/> Integration of ESG issues <input checked="" type="checkbox"/> Other

☒ Index/fund 3

Index/fund name and brief description of ESG methodology	ESG incorporation strategy
ACTIAM Responsible Index Fund Equity North America - A (BFGR)	<input checked="" type="checkbox"/> Screening <input type="checkbox"/> Thematic <input type="checkbox"/> Integration of ESG issues <input checked="" type="checkbox"/> Other

☒ Index/fund 4

Index/fund name and brief description of ESG methodology	ESG incorporation strategy
ACTIAM Responsible Index Fund Equity North America - B (BFGR)	<input checked="" type="checkbox"/> Screening <input type="checkbox"/> Thematic <input type="checkbox"/> Integration of ESG issues <input checked="" type="checkbox"/> Other

☒ Index/fund 5

Index/fund name and brief description of ESG methodology	ESG incorporation strategy
ACTIAM Responsible Index Fund Equity Pacific (BFGR)	<input checked="" type="checkbox"/> Screening <input type="checkbox"/> Thematic <input type="checkbox"/> Integration of ESG issues <input checked="" type="checkbox"/> Other

☐ No

Outputs and outcomes

LEI 15	Voluntary	Descriptive	PRI 1
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LEI 15.1	Indicate how your ESG incorporation strategies have influenced the composition of your portfolio(s) or investment universe.
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☒ Screening

Describe any reduction in your starting investment universe or other effects.

All the ACTIAM Responsible Index Funds combined, around 3% of the benchmark is excluded.

Specify the percentage reduction

%

3

- ☐ Thematic
- ☐ Integration of ESG issues
- ☐ Index incorporating ESG issues (for passively managed funds)

LEI 16	Voluntary	Additional Assessed	PRI 1
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LEI 16.1	Indicate whether your organisation measures how your approach to ESG issues in Listed Equity investments has affected financial and/or ESG performance.
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- ☒ We measure whether our approach to ESG issues impacts funds' financial performance

Describe the impact on:	Impact	Strategies considered
Funds' financial performance	<input checked="" type="radio"/> Positive <input type="radio"/> Negative <input type="radio"/> No impact	<input checked="" type="checkbox"/> Screening <input checked="" type="checkbox"/> Integration <input type="checkbox"/> Thematic <input checked="" type="checkbox"/> Index construction (passively managed funds)

- ☒ We measure whether our approach to ESG issues impacts funds' risk or volatility

Describe the impact on:	Impact	Strategies considered
Funds' risk or volatility	<input type="radio"/> Reduced risk or volatility <input checked="" type="radio"/> Increased risk or volatility <input type="radio"/> No impact	<input checked="" type="checkbox"/> Screening <input checked="" type="checkbox"/> Integration <input type="checkbox"/> Thematic <input checked="" type="checkbox"/> Index construction (passively managed funds)

- ☐ We measure whether our approach to ESG issues impacts funds' ESG performance
- ☐ None of the above

LEI 17	Voluntary	Descriptive	PRI 1
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LEI 17.1	Provide examples of ESG issues that affected your investment view and/or performance during the reporting year.
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- ☒ ESG issue 1

	ESG issue and explanation
Environment	
	ESG incorporation strategy applied
<input checked="" type="checkbox"/> Screening <input type="checkbox"/> Thematic <input type="checkbox"/> Integration <input type="checkbox"/> Combination of ESG incorporation strategies <input type="checkbox"/> Index incorporating ESG issues	
	Impact on investment decision or performance
<p>We excluded four utility companies from investment because they did not have a credible CO2 reduction programme or the intention to set up such a programme. We have given the companies opportunity to provide us with information that might help us inform our decision, but they did not make use of this opportunity.</p>	

☒ ESG issue 2

	ESG issue and explanation
Weapons	
	ESG incorporation strategy applied
<input checked="" type="checkbox"/> Screening <input type="checkbox"/> Thematic <input type="checkbox"/> Integration <input type="checkbox"/> Combination of ESG incorporation strategies <input type="checkbox"/> Index incorporating ESG issues	
	Impact on investment decision or performance
<p>We have excluded a large retailer for selling firearms to consumers. This contravenes our Fundamental Investment Principles.</p>	

☒ ESG issue 3

	ESG issue and explanation
Environment	
	ESG incorporation strategy applied
<input type="checkbox"/> Screening <input type="checkbox"/> Thematic <input type="checkbox"/> Integration <input checked="" type="checkbox"/> Combination of ESG incorporation strategies <input type="checkbox"/> Index incorporating ESG issues	
	Impact on investment decision or performance
<p>We have started engagement with a packaging company because of its application of 'circular economy' principles.</p> <p>Although not ranked top 40% in our best-in-class fund, the company is selected for investment because of its distinct sustainable character under the precondition that an engagement is started to improve the company's performance on EGS issues. For more information on positive selection please check LEI 03.3</p>	

☒ ESG issue 4

	ESG issue and explanation
Weapons	
	ESG incorporation strategy applied
<input checked="" type="checkbox"/> Screening <input type="checkbox"/> Thematic <input type="checkbox"/> Integration <input type="checkbox"/> Combination of ESG incorporation strategies <input type="checkbox"/> Index incorporating ESG issues	
	Impact on investment decision or performance
<p>Company produces elements of a submarine that will be equipped with controversial weapons. Investment in such companies is prohibited by our Fundamental Investment Principles. The company was therefore excluded from our investment universe.</p>	

☐ ESG issue 5

Communication

LEI 18	Mandatory	Core Assessed	PRI 2,6
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LEI 18.1	Indicate if your organisation proactively discloses information on your approach to ESG incorporation in listed equity.
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- ☒ We disclose it publicly

	Provide URL
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<http://www.actiam.nl/en/sustainability/position-papers>

	Provide URL
--	-------------

<http://www.actiam.nl/nl/duurzaamheid/esg-rapportages>

LEI 18.2	Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.
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- ☒ Yes

LEI 18.3	Indicate the information your organisation proactively discloses to clients/ beneficiaries and the public regarding your approach to ESG incorporation.
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- ☐ Broad approach to ESG incorporation
- ☒ Detailed explanation of ESG incorporation strategy used

LEI 18.4	Indicate how frequently you typically report this information.
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- ☒ Quarterly or more frequently
- ☐ Between quarterly and annually
- ☐ Less frequently than annually
- ☐ Other, specify
- ☐ No
- ☐ We disclose it to clients and/or beneficiaries only
- ☐ We do not proactively disclose it to the public and/or clients/beneficiaries

ACTIAM

Reported Information

Public version

Direct - Listed Equity Active Ownership

PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

Engagement

Overview

LEA 01	Voluntary	Descriptive	PRI 2
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LEA 01.1	Provide a brief overview of your organisation's approach to engagement.
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ACTIAM's range of influence consists largely of the influence it can exert as a shareholder. Voting and engagement activities are, therefore, at the core of our strategy. To optimise research and active shareholder-related activities, ACTIAM has outsourced a number of important, labour-intensive tasks to specialised companies. Thus, on the one hand, ACTIAM has chosen a data provider to deliver research and analysis that is tailored to ACTIAM's specific requirements, and on the other hand a service provider to support ACTIAM with the execution of the voting policy. Engagement activities are executed by ACTIAM's own ESG research team.

Decisions on policy and exclusions are made by the ACTIAM Selection Committee. This committee comprises four members: the CEO, performing in the role of Chair; the CIO; the Head of ESG Research; and the Head of Impact Investing.

Engagement activities

ESG themes that lead to engagement follow from our Fundamental Investment Principles (FIP) and sector position papers. ACTIAM pursues two types of engagement: responsive and proactive:

- **Responsive engagement**

When ACTIAM pursues responsive engagement, the objective - based on the Fundamental Investment Principles - is to prevent the company in question from being excluded from its investment universe due to violations of our principles. ACTIAM enters into a dialogue with a company following a controversy with the aim to remedy it and prevent it from happening in the future. If severe controversies and corrective actions occur frequently and/or the willingness to prevent recurrence are unlikely, exclusion is inevitable. Interpreting the response from a company involved in a controversy is, therefore, an important step in an engagement process.

- **Proactive engagement**

In the case of proactive engagement, ACTIAM enters into a constructive dialogue with companies that are not yet achieving sector best practices in certain areas, so as to mitigate the risk of future controversies. In co-operation with companies, ACTIAM tries to improve the entire industry's standard on one or more subjects. Discussions are often about developing, implementing and disclosing policies.

Accountability

We measure the progress of engagements using milestones (see LEA 04.3 for more information). The engagement progress is evaluated and reported on at least a quarterly basis to clients and the ACTIAM Selection Committee. The quarterly public ESG report, which contains examples of engagement activities of the respective quarter, is also published on ACTIAM's website.

Strategy

When pursuing responsive and proactive engagement, ACTIAM may choose to approach a company individually or together with other investors. In general, we prefer collaborative engagements because that way the dialogue will not only be more efficient - and generally more effective - for the company in question, it can also increase the pressure to change.

To support our engagement activities from a broader perspective, ACTIAM also participates in industry-wide and regulatory engagement initiatives. Overall, we seek to find the optimal balance between addressing company-specific concerns versus those that are better addressed through systemic solutions or change.

LEA 02	Mandatory	Gateway	PRI 1,2,3
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LEA 02.1

Indicate your reasons for interacting with companies on ESG issues and indicate who carries out these interactions.

Type of engagement	Reason for interaction
Individual/Internal staff engagements	<input checked="" type="checkbox"/> To support investment decision-making (e.g. company research) <input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues <input checked="" type="checkbox"/> To encourage improved ESG disclosure <input checked="" type="checkbox"/> Other, specify to fulfil client mandates <input type="checkbox"/> We do not engage via internal staff
Collaborative engagements	<input checked="" type="checkbox"/> To support investment decision-making (e.g. company research) <input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues <input checked="" type="checkbox"/> To encourage improved ESG disclosure <input checked="" type="checkbox"/> Other, specify to fulfil client mandates <input type="checkbox"/> We do not engage via collaborative engagements
Service provider engagements	<input type="checkbox"/> To support investment decision-making (e.g. company research) <input type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues <input type="checkbox"/> To encourage improved ESG disclosure <input type="checkbox"/> Other, specify <input checked="" type="checkbox"/> We do not engage via service providers

Process
Process for engagements run internally
LEA 03
Mandatory
Core Assessed
PRI 2
LEA 03.1

Indicate whether your organisation has a formal process for identifying and prioritising engagement activities carried out by internal staff.

☒ Yes

LEA 03.2

Describe how you identify and prioritise engagements.

As noted in question LEA 01.1, our responsive engagements are a response to controversies that present immediate reputational or material risks to us and our clients. These controversies are flagged during a quarterly screening of our investment universe vis-à-vis our Fundamental Investment Principles and the UN Global Compact. In addition, our inhouse ESG Research team conducts research on a case-by-case basis. Companies flagged in this review or that are researched by the ESG Research team are evaluated based on the seriousness of the controversy (compared to the sector) and the likeliness that engagement will be effective (including a governance structure assessment and whether the violation is part of the company's core business, i.e. weapons). Companies involved in serious controversies and deemed to be open to engagement will be assessed by the ESG Research team as to whether engagement or exclusion are warranted.

Our proactive engagements are identified and prioritised based on our focus on the natural resources sectors, whether the governance structure supports shareholder influence, client priorities, the timeliness and materiality of the issues, and the potential for impact.

☐ No

LEA 04**Mandatory****Core Assessed****PRI 2****LEA 04.1**

Indicate if you define specific objectives for your engagement activities.

☒ Yes

- ☒ Yes, for all engagement activities
- ☐ Yes, for the majority of engagement activities
- ☐ Yes, for a minority of engagement activities

☐ No

LEA 04.2

Indicate if you monitor the actions that companies take following your engagements.

☒ Yes

- ☒ Yes, in all cases
- ☐ Yes, in the majority of cases
- ☐ Yes, in the minority of cases

LEA 04.3

Describe how you monitor and evaluate the progress of your engagement activities.

ACTIAM uses the following milestone scheme to track engagement progress.

- Milestone 0: New engagement / objective.
- Milestone 1: Initial communication sent and receipt acknowledged by company.
- Milestone 2: Objectives discussed with company in more detail.
- Milestone 3: Company responds with relevant engagement information or commits to raising the issues internally.
- Milestone 4: Company develops and discloses (to us or publicly) a credible strategy or sets clear targets to address the issues.
- Milestone 5: Company demonstrates that the strategy is being implemented or that targets have been achieved.
- Engagement "Closed" : Company is monitored for ongoing compliance/progress

The engagement progress is evaluated and reported at least on a quarterly basis to clients and the ACTIAM Selection Committee, as well as following any calls, meetings or key correspondence with a company. At this point, our objectives are assessed in terms of progress, as well as whether they

continue to be relevant or material to the company. Once an engagement has been "closed", the company continues to be monitored for ongoing Global Compact Compliance on a quarterly basis.

☐ No

Process for engagements conducted via collaborations

LEA 05	Mandatory	Core Assessed	PRI 2
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LEA 05.1 Indicate whether your organisation has a formal process for identifying and prioritising collaborative engagements.

☒ Yes

LEA 05.2 Describe how you identify and prioritise collaborative engagements.

Collaborative engagements are prioritized based on the same criteria as our individual engagements (see LEA 03.2 above). Additional factors we consider include the reputation of potential partners and the added value of additional, market-specific governance expertise. The decision whether to participate is made by the ESG Research team and reported on at every Selection Committee meeting.

☐ No

LEA 06	Mandatory	Core Assessed	PRI 2
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LEA 06.1 Indicate if the collaborative engagements in which you are involved have defined objectives.

☒ Yes

- ☒ Yes, for all collaborative engagement activities
- ☐ Yes, for the majority of collaborative engagement activities
- ☐ Yes, for a minority of collaborative engagement activities

☐ No

LEA 06.2 Indicate if you monitor the actions companies take following your collaborative engagements.

☒ Yes

- ☒ Yes, in all cases
- ☐ Yes, in the majority of cases
- ☐ Yes, in the minority of cases

LEA 06.3 Describe how you monitor and evaluate the progress of your collaborative engagement activities.

We evaluate the progress of all companies included in collaborative engagements where we are the lead or an active supporting investor.

☐ No

General processes for all three groups of engagers

LEA 09	Voluntary	Additional Assessed	PRI 1,2
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LEA 09.1 Indicate if the insights gained from your engagements are shared with your internal or external investment managers as input for consideration in investment decisions.

Type of engagement	Insights shared
Individual/Internal staff engagements	<input checked="" type="radio"/> Yes, systematically <input type="radio"/> Yes, occasionally <input type="radio"/> No
Collaborative engagements	<input checked="" type="radio"/> Yes, systematically <input type="radio"/> Yes, occasionally <input type="radio"/> No

LEA 10	Mandatory	Gateway/Core Assessed	PRI 2
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LEA 10.1 Indicate if you track the number of engagements your organisation participates in.

Type of engagement	Tracking engagements
Individual / Internal staff engagements	<input checked="" type="radio"/> Yes, we track the number of our engagements in full <input type="radio"/> Yes, we partially track the number of our engagements <input type="radio"/> No, we do not track our engagements but can provide a reasonable estimate of our engagement numbers <input type="radio"/> No, we do not track and cannot estimate our engagements
Collaborative engagements	<input checked="" type="radio"/> Yes, we track the number of our engagements in full <input type="radio"/> Yes, we partially track the number of our engagements <input type="radio"/> No, we do not track our engagements but can provide a reasonable estimate of our engagement numbers <input type="radio"/> No, we do not track and cannot estimate our engagements

Outputs and outcomes

LEA 11	Mandatory to Report Voluntary to Disclose	Core Assessed	PRI 2
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LEA 11.1 Indicate the number of companies with which your organisation engaged during the reporting year.

	Number of companies engaged (avoid double counting, see explanatory notes)
Individual / Internal staff engagements	99
Collaborative engagements	197

LEA 11.2

Indicate what percentage of your engagements were comprehensive during the reporting year. [Optional]

Type of engagement	% Comprehensive engagements
Individual / Internal staff engagements	<input type="radio"/> > 50% <input checked="" type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> None
Collaborative engagements	<input type="radio"/> >50% <input checked="" type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> None

LEA 11.3

Indicate what percentage of your collaborative engagements you were a leading organisation on during the reporting year. [Optional]

Type of engagement	% Leading role
Collaborative engagements	<input type="radio"/> >50% <input type="radio"/> 10-50% <input checked="" type="radio"/> <10% <input type="radio"/> None

LEA 12
Voluntary
Additional Assessed
PRI 2
LEA 12.1

Indicate if your engagements in the reporting year covered E, S and/or G issues.

Type of engagement	Coverage
Individual / Internal staff engagements	<input checked="" type="checkbox"/> Environmental <input checked="" type="checkbox"/> Social <input checked="" type="checkbox"/> Corporate Governance <input type="checkbox"/> We do not track this information
Collaborative engagements	<input checked="" type="checkbox"/> Environmental <input checked="" type="checkbox"/> Social <input checked="" type="checkbox"/> Corporate Governance <input type="checkbox"/> We do not track this information

LEA 12.2

Provide an estimated breakdown by E, S and/or G issues.

Individual / Internal staff engagements

% Environmental only

1

% Social only

8

% Corporate Governance only

67

% Overlapping ESG issues

24

100%

Collaborative engagements

% Environmental only

25

% Social only

16

% Corporate Governance only

35

83

	% Overlapping ESG issues
--	--------------------------

24

100%

LEA 12.3	Additional information.
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ACTIAM conducts additional engagements that are not tied to specific companies and thus are not reflected here. Examples include (but are not limited to) engagement work related to: Climate Bonds Initiative Industry Working Group; EU 2030 climate& energy declaration; EU conflict mineral legislation; EITI; Investor statement on Green Bonds; Natural Capital Declaration; PRI ESG integration working group; and PRI Fixed Income working group.

Climate Bonds Initiative Industry Working Group: the Industry Working Group consults on structure and content of Climate Bonds Standards and comments on proposed certification and verification processes.

EU 2030: together with a group of multinational companies, ACTIAM sent a statement letter to the EU, requesting more ambitious targets for the reduction of CO2 emission, use of renewable energy and energy efficiency.

EU conflict minerals: ACTIAM participated in an investor statement on EU proposed conflict mineral legislation. Recommendations were made in this letter, as well as the request to align EU legislation more with US law on this issue. This includes a mandatory reporting mechanism.

EITI: ACTIAM is an EITI (alternate) Board Member representing the investor constituency, and a member on two key Board Committees: the Outreach and Candidature Committee and the Implementation Committee. The former oversees the Secretariat's activities for outreach to countries interested in joining the Initiative, and supporting applicant countries during the candidature process. The latter advises the Board on countries' implementation progress.

Investor statement on green bonds: together with the Climate Bonds Initiative, ACTIAM drafted an investor statement on climate bonds, encouraging governments to address climate change, experts to develop clear industry standards, and issuers to ensure transparency. This investor statement was backed by >2 trillion dollars of assets.

Under the category of Governance, ACTIAM raises the following topics with investee companies that were not specified in the PRI definitions document, but fall under "matters of business strategy": regional and market trends, financial performance and strategy, dividend policy, M&A strategy, and risk management.

LEA 13	Voluntary	Descriptive	PRI 2
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LEA 13.1	Indicate whether you have a reliable estimate of the number of cases during the reporting year where a company has changed its practices, or made a commitment to do so, following your organisation's and/or your service provider's engagement activities.
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☒ Yes

LEA 13.2	Indicate the number of companies that changed or committed to change in the reporting year following your organisation's and/or your service provider's engagement activities.
----------	--

	Number of company changes or commitments to change
Individual / Internal staff engagements	5
Collaborative engagements	4

☐ No

LEA 13.3

Additional information.

We evaluate the progress of all individual engagements, and companies included in collaborative engagements where we are the lead or an active supporting investor. The basis for the assessment are our milestones as explained in question LEA 04.3.

LEA 14

Voluntary

Descriptive

PRI 2

LEA 14.1

Provide examples of the engagements that your organisation carried out during the reporting year.

☒ Add Example 1

Topic or ESG issue	Environment (pollution) and social (human rights)
Conducted by	<input checked="" type="checkbox"/> Individual / Internal <input type="checkbox"/> Collaborative
Objectives	Establish robust health and safety policies and ensure effective training and monitoring is in place to reduce health and safety incidents; develop strong and detailed policies on freedom of association and the elimination of discrimination; develop and implement group-wide system to promote best practice in terms of labour standards and environmental impacts in its agricultural supply chain; provide information on any food safety management system to ensure that products remain free of contaminants throughout the production cycle; publicly report GHG emissions and provide information to the CDP Water Disclosure Project and CDP's Forest programme.
Scope and Process	We have been in written correspondence with the company over the past year. This slows down the engagement process, however as it is a big company and we are optimistic about the potential results, we find the engagement worth the effort.
Outcomes	The company has progressed from milestone 1 to milestone 3 in 2014. An explanation of the milestones can be found below (LEA 14.2).

☒ Add Example 2

Topic or ESG issue	Social (indigenous rights)
Conducted by	<input checked="" type="checkbox"/> Individual / Internal <input type="checkbox"/> Collaborative
Objectives	Understand company's human rights policies regarding indigenous people and land rights; ascertain the extent to which policies are implemented effectively; encourage disclosure of key performance indicators.
Scope and Process	We have had a meeting and a call with this company in 2014.
Outcomes	Through their cooperative approach, the company has reassured us of its willingness to engage with shareholders. The company has also become a member of an important sector initiative, meaning they will have to comply with certain policies also reflected in our engagement objectives. The company has progressed from milestone 3 to milestone 4 in 2014. We will continue to meet with and monitor this company in the course of 2015.

☒ Add Example 3

Topic or ESG issue	Social and governance
Conducted by	<input checked="" type="checkbox"/> Individual / Internal <input type="checkbox"/> Collaborative
Objectives	Engagement is intended to address the topics of the company's dividend policy, EHS disclosure and ISO140001 certification.
Scope and Process	We have met with high level representatives (CFO, CEO) of this company several times throughout the year to discuss our objectives.
Outcomes	We are assured that our suggestions were heard and taken into consideration. The company has therefore progressed from milestone 0 to milestone 3.

☒ Add Example 4

Topic or ESG issue	Environment and social
Conducted by	<input checked="" type="checkbox"/> Individual / Internal <input type="checkbox"/> Collaborative
Objectives	Engagement is intended to address the company's sustainability policy, harm reduction policy and policy on mitigating future litigation risk.
Scope and Process	The engagement with this tobacco company has been open and informative.
Outcomes	We were able to discuss all our objectives with the company and find that the company has shown sector leadership by addressing these key issues. The has therefore progressed from mileston 4 to milestone 5 in 2014.

☒ Add Example 5

Topic or ESG issue	Enviornment and governance
Conducted by	<input checked="" type="checkbox"/> Individual / Internal <input type="checkbox"/> Collaborative
Objectives	Disclosure of programmes on hazardous waste / toxic chemicals, programmes on reduction of GHG emissions and carbon intensity, improving supplier management system, open dialogue on strategy topics.
Scope and Process	We have started an engagement with this company (in chemicals sector) in order for it to become 'best in class' in its sector.
Outcomes	The engagement with this company has progressed well and was fruitful. The company has made visible changes, for example by implementing energy targets. We have been in contact with the CEO and other relevant staff. These changes have led to the company becoming 'best in class' based on its ESG score.

☐ Add Example 6

☐ Add Example 7

☐ Add Example 8

☐ Add Example 9

☐ Add Example 10

LEA 14.2	Additional information.
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ACTIAM uses the following milestone scheme to track engagement progress.

- Milestone 0: New engagement/objective
- Milestone 1: Initial communication sent and receipt acknowledged by company
- Milestone 2: Objectives discussed with company in more detail
- Milestone 3: Company responds with relevant engagement information or commits to raising the issues internally
- Milestone 4: Company develops and discloses (to us or publicly) a credible strategy or sets clear targets to address the issues
- Milestone 5: Company demonstrates that the strategy is being implemented or that targets have been achieved
- Engagement "Closed" :Company is monitored for ongoing compliance/progress

The above engagements were selected because they reflect our focus on the natural resource sectors (mining, oil & gas, food, beverages & tobacco, and forestry), as well as the difference between our proactive and responsive strategies. When engaging companies proactively, we often take up a number of issues where sector leaders have yet to achieve best practices. In our responsive approach, we focus on critical concerns that pose immediate reputational and financial risks for investors.

Communication

LEA 15	Mandatory	Core Assessed	PRI 2,6
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LEA 15.1	Indicate whether your organisation proactively discloses information on its engagements.
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- ☒ We disclose it publicly

	provide URL
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<http://www.actiam.nl/en/sustainability/engagement>

	provide URL
--	-------------

<http://www.actiam.nl/nl/duurzaamheid/esg-rapportages>

LEA 15.2	Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.
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- ☐ Yes
- ☒ No

LEA 15.3

Indicate what engagement information your organisation proactively discloses to the public.

- ☒ Details of the selections, priorities and specific goals of engagement
- ☒ Number of engagements
- ☒ Breakdown of engagements by type/topic
- ☒ Breakdown of engagements by region
- ☐ An assessment of the current status of the engagement
- ☐ Outcomes that have been achieved from the engagement
- ☐ Other information

LEA 15.4

Indicate how frequently you typically report engagements information to the public.

- ☐ Disclosed continuously (prior to and post engagements)
- ☒ Disclosed quarterly
- ☐ Disclosed annually
- ☐ Disclosed every two years or less
- ☐ Other, specify

LEA 15.5

Indicate what engagement information your organisation proactively discloses to clients/beneficiaries.

- ☒ Details of the selections, priorities and specific goals of engagement
- ☒ Number of engagements
- ☒ Breakdown of engagements by type/topic
- ☒ Breakdown of engagements by region
- ☒ An assessment of the current status of the engagement
- ☒ Outcomes that have been achieved from the engagement
- ☒ Other information

Select engagement cases/themes reported quarterly

LEA 15.6

Indicate how frequently you typically report engagements information to clients/beneficiaries.

- ☐ Disclosed continuously (prior to and post engagements)
 - ☒ Disclosed quarterly
 - ☐ Disclosed annually
 - ☐ Disclosed every two years or less
 - ☐ Other, specify
- ☐ We disclose it to clients and/or beneficiaries only
- ☐ We do not proactively disclose it to the public and/or clients/beneficiaries.

(Proxy) voting and shareholder resolutions

Overview

LEA 16	Voluntary	Descriptive	PRI 2
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LEA 16.1

Provide a brief overview of your organisation's approach to (proxy) voting (including the filing and/or co-filing of shareholder resolutions if applicable).

ACTIAM exercises the voting rights attached to our clients' holdings to reflect their interests, and aims to vote at all shareholder meetings of the companies in our clients' portfolios. Accordingly, ACTIAM has developed a responsible voting policy, which is based on internationally recognised best practice guidelines in the areas of corporate governance and responsible investment.

ACTIAM has adopted the International Corporate Governance Network's (ICGN) corporate governance principles as our overarching guideline on governance best practice. These principles are internationally recognised as the best practice standard in corporate governance circles. The ICGN principles reflect and endorse the OECD Principles of Corporate Governance, as well as additional guidance developed by the ICGN.

Based on these guidelines, ACTIAM has developed a general voting policy, which covers typical shareholder meeting agenda items across the markets covered by ACTIAM's voting service. When assessing the governance of individual companies, ACTIAM will also follow, where appropriate, market-specific best practices as presented in country codes and other recognised best practice guidelines. (Annex I to our voting policy addresses market-specific governance practices and proposals where ACTIAM diverges from the general voting policy).

Furthermore, consistent with ACTIAM's strategy and views, our Fundamental Investment Principles are applied to proposals dealing with ethical, environmental and social issues, thus encouraging corporate best practices in these areas. These principles are based on international treaties, conventions and best practices, such as the United Nations Global Compact; the Universal Declaration of Human Rights; the fundamental principles of the International Labour Organisation; and the OECD Guidelines for Multinational Enterprises.

Our principles also help to guide our engagement activities, of which proxy voting represents the most basic form. We may apply stricter voting criteria to companies we are actively engaging through investor dialogue. ACTIAM may also file or co-file shareholder resolutions in instances where companies have proven to be insufficiently responsive to regular shareholder dialogue.

In most cases, we vote by proxy and voting is executed by a service provider based on our voting policy. On a few strategic occasions, ACTIAM may attend AGMs and vote in person.

ACTIAM's voting policy can be found online at <http://www.actiam.nl/en/sustainability/voting>

Process

LEA 17	Mandatory	Descriptive	PRI 2
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LEA 17.1

Indicate how you typically make your (proxy) voting decisions and what this approach is based on.

Approach

- ☐ We use our own research or voting team and make our own voting decisions without the use of service providers.
- ☐ We hire service provider(s) which make voting recommendations or provide research that we use to inform our voting decisions.
- ☒ We hire service provider(s) which make voting decisions on our behalf, except for some pre-defined scenarios for which we review and make voting decisions.

	Based primarily on
--	--------------------

- ☐ the service provider voting policy signed off by us
- ☒ our own voting policy
- ☐ our clients requests or policy
- ☐ other, explain
- ☐ We hire service provider(s) which make voting decisions on our behalf.

LEA 18	Mandatory	Descriptive	PRI 2
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LEA 18.1	Of the voting recommendations that your service provider made in the reporting year, indicate what percentage your organisation reviewed, and the reasons for the review.
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Percentage of voting recommendations your organisation reviewed

- ☐ >20%
- ☐ 5-20%
- ☐ 1-5%
- ☒ <1%

Reasons for review

- ☒ Specific ESG issues
- ☐ Votes where a significant level of ownership is held
- ☒ Votes against management or abstentions
- ☐ Conflicts of interest
- ☐ Corporate actions such as M&A, disposal, etc.
- ☒ Other, explain

We review the voting recommendations for the companies we engage individually.

LEA 19	Voluntary	Descriptive	PRI 2
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LEA 19.1	To ensure that your (proxy) votes are cast and reach their intended destination on time, indicate if you did the following.
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- ☒ Obtain confirmation that votes have been received by the company:
 - ☒ for a majority of votes
 - ☐ for a minority of votes
- ☒ Participate in projects to improve the voting trail and/or to obtain vote confirmation
- ☐ None of the above

LEA 19.2	Provide additional information on your organisation's vote confirmation efforts.
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Our service provider uses the Broadridge voting platform ProxyEdge to cast votes electronically. The provider votes all of equity holdings managed by ACTIAM, including partial votes where share blocking may apply, and casts votes ahead of the ProxyEdge vote deadline. ProxyEdge confirms the acceptance and processing of these votes. In addition, once a year, ACTIAM requests the provider to conduct a vote audit to verify that the votes cast were processed by ProxyEdge, according to policy and on time. For 2014, the audit covers 45 company meetings and further lists any other meetings where known voting errors occurred. The audit is reviewed by ACTIAM's Active Ownership Specialist and Selection Committee.

LEA 20	Voluntary	Additional Assessed	PRI 2
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LEA 20.1	Indicate if your organisation has a securities lending programme.
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☒ Yes

LEA 20.2	Indicate how voting is addressed in securities lending programme.
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Please select one of the following

- ☒ We recall most securities for voting on all ballot items
- ☐ We recall some securities for voting on some ballot items on a systematic basis in line with specified criteria
- ☐ We occasionally recall some securities for voting on some ballot items on an ad-hoc basis
- ☐ We empower our securities lending agent to decide when to recall securities for voting purposes
- ☐ We do not recall our shares for voting purposes
- ☐ Other (please specify)
- ☐ No

LEA 20.3	Additional information. [Optional]
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ACTIAM also addresses share blocking in its voting policy, whereby it will generally block a percentage of its clients' holdings (normally 75%) in companies where share blocking is required so that it can participate in the meeting, but decrease the risk of being unable to trade at the sensitive time around the company's general meeting. However, if voting somehow does conflict with trading, the custodian will de-block shares to be able to trade, i.e. trading will be prioritised over voting. ACTIAM will also instruct its custodian to ensure that shares are not blocked at the sub-custodian level where there is no share-blocking requirement in the company's articles or at a market-level.

LEA 21	Mandatory	Core Assessed	PRI 2
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LEA 21.1

Indicate if you ensure that companies are informed of the rationale when you and/or the service providers acting on your behalf abstain or vote against management recommendations.

- ☐ Yes, in most cases
- ☒ Sometimes, in the following cases:
- ☐ votes in selected markets
 - ☐ votes on certain issues (all markets)
 - ☐ votes for significant shareholdings (all markets)
 - ☒ other, explain
with companies we engage.
- ☐ No
- ☐ Not applicable as we and/or our service providers do not abstain or vote against management recommendations

Outputs and outcomes

LEA 22**Mandatory****Core Assessed****PRI 2****LEA 22.1**

For listed equities where you and/or your service provider has the mandate to issue (proxy) voting instructions, indicate the percentage of votes cast during the reporting year.

- ☒ We do track or collect this information

Votes cast (to the nearest 1%)

%

100

Specify the basis on which this percentage is calculated

- ☐ of the total number of ballot items on which you could have issued instructions
- ☒ of the total number of company meetings at which you could have voted
- ☐ of the total value of your listed equity holdings on which you could have voted

LEA 22.2

If there are specific reasons why you did not vote certain holdings, explain these, and if possible, indicate the percentage of holdings affected by these factors. [Optional]

At 0.3% of total possible meetings, votes were not cast due to clerical error.

- ☐ We do not track or collect this information

LEA 23**Voluntary****Descriptive****PRI 2**




LEA 23.1

Indicate if you track the voting instructions that you and/or your third party have issued on your behalf.

☒ Yes, we track this information

LEA 23.2

Of the voting instructions that you and/or third parties have issued on your behalf, indicate the proportion of ballot items that were:

Voting instructions	Breakdown as percentage of votes cast
For (supporting) management recommendations	 83.8
Against (opposing) management recommendations	 16.1
Abstentions	 0.1

100%

LEA 23.3

For the reporting year, describe your approach towards voting on shareholder resolutions.

As a responsible investor, ACTIAM will tend to favour shareholder resolutions seeking policies, measures or disclosures that will have a positive impact on investee companies' ethical, social and environmental performance. ACTIAM will normally vote in favour of shareholder proposals aimed at improving the company's governance and encouraging the company to implement policies and measures so as to prevent a possible conflict with ACTIAM's Fundamental Investment Principles. ACTIAM will vote against shareholder proposals that might lead to the opposite. Just as with standard agenda items, all shareholder proposals will be analysed on a case-by-case basis, taking into consideration:

- The reasonableness of the demand;
- The credentials of the proponent;
- The responsiveness of the company; and
- The anticipated costs and benefits to the company and thus to shareholders of the resolution passing.

☐ No, we do not track this information

LEA 23.4	Additional information.
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ACTIAM tracks and reports detailed voting information on a client-by-client basis only, and thus does not have cumulative voting data that reflects the total votes cast as for, against or abstain, or specifically for or against management across all ACTIAM accounts. The information provided above is thus from 1 client whose holdings are generally representative of ACTIAM's clients on the whole.

LEA 24	Voluntary	Descriptive	PRI 2
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LEA 24.1	Indicate if your organisation directly or via a service provider filed or co-filed any shareholder resolutions during the reporting year.
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- ☐ Yes
☒ No

LEA 25	Voluntary	Descriptive	PRI 2
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LEA 25.1	Provide examples of the (proxy) voting activities that your organisation and/or service provider carried out during the reporting year.
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- ☒ Add Example 1

Topic or ESG issue	Environment
Decision made by	<input type="checkbox"/> Internal staff <input checked="" type="checkbox"/> Service provider
Objectives	Sustainability targets in remuneration policy.
Scope and Process	We voted against the proposed remuneration policy of a large bank because sustainability targets were not part of the policy. We also supported a shareholder proposal requesting for more transparency regarding greenhouse gasses emitted by the activities that the bank finances. This bank is active in the coal and mining sector, therefore we believe sustainability targets and transparency are very important and enable us to better estimate the risks that the bank is exposed to.
Outcomes	The shareholder proposal was not adopted.

- ☒ Add Example 2

Topic or ESG issue	Governance
Decision made by	<input type="checkbox"/> Internal staff <input checked="" type="checkbox"/> Service provider
Objectives	Reject remuneration policy.
Scope and Process	We voted against the remuneration policy of this company, because the proposed rewards were not sufficiently dependent on performance.
Outcomes	The remuneration policy was rejected by more than two thirds of the shareholders.

☒ Add Example 3

Topic or ESG issue	Governance & environment
Decision made by	<input type="checkbox"/> Internal staff <input checked="" type="checkbox"/> Service provider
Objectives	Reporting on risk of stranded assets.
Scope and Process	Together with 30% of the shareholders, we requested an oil and gas company to report on the risks of reduced demand for oil and gas.
Outcomes	30% of shareholders supported this proposal.

☒ Add Example 4

Topic or ESG issue	Environment and governance
Decision made by	<input type="checkbox"/> Internal staff <input checked="" type="checkbox"/> Service provider
Objectives	For two oil companies to report on programmes for consequences of climate change.
Scope and Process	We wanted to companies to be transparant about their plans for minimizing the impact of climate change on their business.
Outcomes	The proposal was not adopted, but we hope it had a signalling effect.

☒ Add Example 5

Topic or ESG issue	Governance
Decision made by	<input type="checkbox"/> Internal staff <input checked="" type="checkbox"/> Service provider
Objectives	Prevent golden handshake from being provided to CEO too easily.
Scope and Process	The criteria for a golden handshake for the CEO of this automotive firm were not strict enough.
Outcomes	More than 70% of shareholders rejected the proposed pay package.

- ☐ Add Example 6
- ☐ Add Example 7
- ☐ Add Example 8
- ☐ Add Example 9
- ☐ Add Example 10

Communication

LEA 26	Mandatory	Core Assessed	PRI 2,6
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LEA 26.1 | Indicate if your organisation proactively discloses information on your voting activities.

- ☒ We disclose it publicly

provide URL

<https://east.proxydisclosure.com/ProxyDisclosureWeb/wd.do?token=f5207edddff9450c99c335181d190946&>

provide URL

<https://east.proxydisclosure.com/ProxyDisclosureWeb/wd.do?token=07758e3ddaf04932b1f6b29e38a05743>

LEA 26.2 | Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.

- ☒ Yes

LEA 26.3 | Indicate the voting information your organisation proactively discloses to the public and/or to clients/beneficiaries.

Indicate how much of your voting record you disclose

- ☒ All voting decisions
☐ Some voting decisions
☐ Only abstentions and opposing vote decisions
☐ Summary of votes only

Indicate what level of explanation you provide

- ☐ Explain all voting decisions
☒ Explain some voting decisions
☐ Only explain abstentions and votes against management
☐ No explanations provided

LEA 26.4 | Indicate how frequently you typically report voting information.

- ☐ Continuously (primarily before meetings)
☒ Continuously (soon after votes are cast)
☐ Quarterly or more frequently
☐ Between quarterly and annually
☐ Less frequently than annually
☐ Other, specify
- ☐ No
- ☐ We disclose it to clients/beneficiaries only
- ☐ We do not proactively disclose our voting activities to the public and/or to clients/beneficiaries

Via Broadridge, we have set up voting disclosure sites for our clients where their voting results are published in real time. Additionally, each quarter we report to clients on voting trends across all the regions where they are invested, a select number of voting cases that highlight particularly interesting or controversial ESG issues, and their voting statistics (number of meetings, number of FOR, AGAINST or ABSTAIN votes, broken down by management and shareholder resolutions). These reports are also published (in Dutch) on ACTIAM's website: <http://www.actiam.nl/nl/duurzaamheid/esg-rapportages>.

ACTIAM

Reported Information

Public version

Direct - Fixed Income

PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

Overview

FI 01	Mandatory to Report	Voluntary to Disclose	Gateway/Peering	PRI 1
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FI 01.1

Provide a breakdown of your internally managed fixed income investments by passive, quantitative, fundamental and other active strategies. For strategies that account for less than 10% of your fixed income investments, indicate if you would still like to report your activities.

Fixed income – corporate

Strategies

- ☐ Passive
- ☒ Active – quantitative (quant)

Percentage of internally managed fixed income - corporate

☒ <10%

Report on your strategies that represents <10% of corporate fixed income

- ☒ Yes
- ☐ No
- ☐ 10-50%
- ☐ >50%
- ☒ Active - fundamental and other active strategies

Percentage of internally managed fixed income - corporate

- ☐ <10%
- ☐ 10-50%
- ☒ >50%

Fixed income – government

Strategies

- ☒ Passive

Percentage of internally managed fixed income - government

☒ <10%

Report on your strategies that represents <10% of government fixed income

- ☒ Yes
☐ No
☐ 10-50%
☐ >50%
☒ Active – quantitative (quant)

Percentage of internally managed fixed income - government

- ☐ <10%
☒ 10-50%
☐ >50%
☒ Active - fundamental and other active strategies

Percentage of internally managed fixed income - government

- ☐ <10%
☐ 10-50%
☒ >50%

FI 02	Mandatory to Report	Voluntary to Disclose	Peering	General
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FI 02.1 Provide a breakdown of your internally managed fixed income investments by credit quality.

Credit quality	Fixed Income - Corporate
Investment grade	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50%
High yield	<input type="radio"/> 0% <input checked="" type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
Distressed	<input checked="" type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%

Credit quality	Fixed Income - Government
Investment grade	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50%
High yield	<input checked="" type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
Distressed	<input checked="" type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%

FI 02.2

Provide a breakdown of your fixed income investments between primary and secondary market.

Market	Fixed Income - Corporate
Primary market (new issues)	<input type="radio"/> 0% <input type="radio"/> <10% <input checked="" type="radio"/> 10-50% <input type="radio"/> >50%
Secondary market	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50%

Market	Fixed Income - Government
Primary market (new issues)	<input type="radio"/> 0% <input checked="" type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
Secondary market	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50%

ESG incorporation in actively managed fixed income

FI 03	Voluntary	Descriptive	PRI 1
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FI 03.1	Provide a brief overview of how you incorporate ESG issues in fixed income investments.
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Fixed Income - Corporate

ACTIAM has implemented a policy to judge its fixed income investments in the light of its Fundamental Investment Principles (which were further explained in the Overarching Approach chapter). This policy applies to investments in corporate bonds, collateralised (covered and securitised) bonds, government bonds, sub-sovereign bonds, and supranational bonds.

Corporate bonds

To decide upon the eligibility of investments in corporate bonds, compliance with the Fundamental Investment Principles by the issuer is decisive. If a company has been approved for investment in its equity, it is also approved for investment in its corporate bonds. Conversely, a corporate bond is automatically excluded from investment when the issuer is excluded for investment in equity. Our ESG policies also apply to issuers in our investment universe that do not have an equity listing.

Collateralized bonds

Collateralised (covered and securitised) bonds are examined individually. As a ground rule, the structured product will be disapproved when the issuing institution has been disapproved. When the issuing institution has been approved, the eligibility of investments in the structured product is determined by individual examination. Among other things, the specific features of the product (credit cards, mortgages) and its (non-) compliance with the Fundamental Investment Principles will be considered.

Climate / green bonds

Although it is an immature and rapidly evolving market, ACTIAM developed a separate policy for climate bonds. Climate bonds are examined on a case-by-case basis. In our climate bonds policy, we have disclosed criteria for the management and use of proceeds, processes for project selection and evaluation, reporting and assurance. This policy is reviewed on a regular basis, in the light of new developments in the climate bonds market. ACTIAM is also actively involved with the Climate Bonds Initiative and the Green Bond Principles (see Overarching Approach question 10.1).

Fixed Income - Government

Government bonds

For the investment in government bonds, the countries in the investment universe (Markit iBoxx) are screened for possible violations of the prohibition of involvement in controversial weapons production, violations of fundamental human and labour rights and violations of environmental standards.

Given the fact that ACTIAM's sphere of influence is limited to the investment decisions under its full control, this policy restrictively applies to ACTIAM's direct investments in government bonds. It does not apply to indirect investments in government bonds (e.g. through investments in index funds).

Weapons

ACTIAM excludes investments in entities that are involved in controversial arms trade. This concerns the trade of conventional weapons, including the provision of related services, with countries and non-state actors against which arms embargoes are imposed by the Security Council of the United Nations, or the Council of the European Union.

ACTIAM considers weapons controversial if they are forbidden under international law and banned by international conventions or treaties, or if they violate fundamental humanitarian principles when they are used. The humanitarian principles include the principles of proportionality, which requires the prevention of unnecessary suffering, and distinction, which requires that military and civilian targets are distinguished.

ACTIAM considers the following weapons as controversial:

- Anti-personnel mines: as defined by the Convention on the Prohibition of the Use, Stockpiling, Production and Transfer of Anti-Personnel Mines and on their Destruction, 1997;
- Biological weapons: as defined by the Convention on the Development, Production and Stockpiling of Bacteriological (Biological) and Toxin Weapons and on their Destruction, 1972;

- Chemical weapons: as defined by the Convention on the Prohibition of the Development, Production, Stockpiling and Use of Chemical Weapons and on their Destruction, 1993;
- Cluster weapons: as defined by the Convention on Cluster Munitions, 2008;
- Nuclear weapons;
- Conventional weapons equipped with white phosphorus or depleted uranium.

In addition to the conventions listed above, ACTIAM considers the following international conventions when applying this principle:

- Treaty on the Non-Proliferation of Nuclear Weapons, 1968
- Comprehensive Nuclear-Test-Ban Treaty
- Protocol for the Prohibition of the Use of Asphyxiating, Poisonous or Other Gases, and of Bacteriological Methods of Warfare, 1925
- Convention on Prohibitions or Restrictions on the Use of Certain Conventional Weapons Which May be Deemed to be Excessively Injurious or to Have Indiscriminate Effects, 2001
- Article 36 of Protocol I Additional to the 1949 Geneva Conventions, 1977

Human/labour rights and environmental standards

ACTIAM excludes countries from investment in government bonds, when there is an unacceptable risk of (future) involvement in serious and gross human and labour rights violations and/or serious, irreversible environmental damage, for which the government can be held responsible. Accountability on the part of a government occurs when the government is complicit in the violations and is taking insufficient measures to avoid the reoccurrence of similar violations.

Sub-sovereigns and supranational bonds

For sub-sovereigns, a derivative of the stance regarding government bonds is applied. When a country has been approved, then also the regions, agencies, public banks and other sub-sovereigns are approved, unless there are specific controversies pertaining to those sub-sovereigns. When any given country has been excluded, bonds from its sub-sovereigns are approved unless the controversies pertaining to the central government are also directly applicable to the sub-sovereign actors. Investments in bonds issued by supranational organizations are admissible as long as the issuers concerned are compliant with the Fundamental Investment Principles.

Climate / green bonds

See above (question Fixed Income - Corporate).

Fixed Income - Corporate

Implementation processes

FI 04	Mandatory	Gateway/Core Assessed	PRI 1
FI 04.1	Indicate (1) which ESG incorporation strategy and/or combination of strategies you apply to your actively managed corporate fixed income investments; and, (2) the breakdown of your actively managed corporate fixed income investments by incorporation strategy or combination of strategies.		

ESG incorporation strategy (select all that apply)

- ☐ Screening alone (i.e. not combined with any other strategies)
- ☐ Thematic alone (i.e. not combined with any other strategies)
- ☐ Integration alone (i.e. not combined with any other strategies)
- ☐ Screening + Integration strategies
- ☐ Thematic + integration strategies
- ☐ Screening + thematic strategies
- ☒ All three strategies combined

Percentage of active corporate fixed income to which the strategy is applied (estimate +/- 10%)	<div style="border: 1px solid black; padding: 5px;"> <div style="background-color: #0070C0; color: white; text-align: center; padding: 2px 10px;">%</div> <div style="text-align: center; padding-top: 5px;">100</div> </div>
---	---

- ☐ No incorporation strategies applied

Total actively managed fixed income - corporate

100%

FI 04.2	Describe your primary reasons for choosing a particular incorporation strategy.
----------------	---

We chose to use a combination of screening, integration and thematic strategies for meeting our ESG goals. This combination enables us to identify the companies that violate our Fundamental Investment Principles (screening), to include ESG-considerations in our investments (integration), and to select environmentally friendly activities (thematic investment). Likewise to our equities approach, we exclude or start engagement with companies that violate our ESG policies. We invest in sustainable activities (for example through green bonds) because we want to actively contribute to the transition to a low carbon economy.

FI 05	Voluntary	Additional Assessed	PRI 1
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FI 05.1	Indicate what ESG information you use in your ESG incorporation strategies and who provides this information.
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Type of ESG information

- ☒ Raw ESG company data

	Describe who provides this information.
--	---

Data provider and in-house ESG Research team.

- ☒ Issuer-related analysis or ratings

	Describe who provides this information.
--	---

Data provider and in-house ESG Team.

- ☒ Sector-related analysis or ratings

	Describe who provides this information.
--	---

Data provider and in-house ESG Team, in close cooperation with Portfolio Management team.

- ☒ Country-related analysis or ratings

	Describe who provides this information.
--	---

Data provider + Portfolio managers

- ☒ Screened bond list

	Describe who provides this information.
--	---

Data provider

- ☐ ESG issue-specific analysis or ratings
- ☐ Other, specify

FI 05.2	Provide a brief description of the ESG information used, highlighting any differences of sources of information across your ESG incorporation strategies.
----------------	---

A first screening of the investment universe (iBoxx) is done by an external data provider. They screen the list for issuers/companies violating our Fundamental Investment Principles. Subsequently the in-house ESG team will conduct their own analyses and research. Both will also supply sector related analyses and country-related analyses.

(A) Implementation: Screening

FI 06	Mandatory	Descriptive	PRI 1
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FI 06.1	Indicate and describe the type of screening you apply to your internally managed active corporate fixed income investments.
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Type of screening

- ☒ Negative/exclusionary screening

Screened by

- ☒ Product
- ☒ Activity
- ☐ Sector
- ☐ Country/geographic region
- ☒ Environmental and social practices and performance
- ☒ Corporate governance

	Description
--	-------------

An exclusionary screening is done every quarter based on our Fundamental Investment Principles which incorporate Environmental, Social and Governance Issues. Next to that several products and activities, for instance nuclear weapons or *riverine tailings disposal*, are excluded.

- ☒ Positive/best-in-class screening

Screened by

- ☐ Product
- ☒ Activity
- ☐ Sector
- ☐ Country/geographic region
- ☐ Environmental and social practices and performance
- ☐ Corporate governance

	Description
--	-------------

We apply a positive selection type of screening for climate / green bonds. Whether or not ACTIAM buys a green bond depends on the activities that are financed by the bond, as well as other criteria. The activities need to contribute to climate change resilience/adaptation or help to prevent climate change.

- ☒ Norms-based screening

Screened by

- ☒ UN Global Compact Principles
- ☒ Universal Declaration of Human Rights
- ☒ International Labour Organization Conventions
- ☒ United Nations Convention Against Corruption
- ☒ OECD Guidelines for Multinational Enterprises
- ☒ Other, specify

Please check the list of other international mechanisms we consult as an appendix to our FIP on our website: <http://www.actiam.nl/en/sustainability/position-papers>.

	Description
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The Fundamental Investment Principles are based on international treaties, conventions and best practices.

FI 06.2

Describe how the screening criteria are established, how often the criteria are reviewed and how you notify clients and/or beneficiaries when changes are made.

Screening criteria (Fundamental Investment Principles) are established by the in-house ESG team in close collaboration with our clients and are reviewed every quarter. The final decision to approve a change in the Fundamental Investment Principles lies in the hands of the ACTIAM Selection Committee. The ACTIAM Selection Committee meets at least 4 times a year and decides on among other things on the eligibility of investments and revisions of the Fundamental Investment Principles. This decision and policy-making body comprises four members: the CEO, performing the role of Chair; the CIO; the Head of the ESG Research team; and the Head of Impact Investing. After each ACTIAM Selection Committee meeting clients are informed on the decisions made.

FI 07**Mandatory****Core Assessed****PRI 1****FI 07.1**

Indicate which processes your organisation uses to ensure that screening in corporate fixed income is based on robust analysis.

- ☒ Comprehensive research is undertaken or sourced to determine issuers' ESG performance
- ☒ Issuers are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- ☒ External research and data used to identify issuers to be excluded/included is subject to internal audit by ESG/RI staff, the internal audit function or similar
- ☒ Information on ESG issues and/or ratings is updated regularly to ensure that portfolio holdings comply with fund policies
- ☒ A committee or body with representatives independent of the individuals who conduct ESG research reviews some or all screening decisions
- ☒ A periodic review of the quality of the research undertaken or provided is carried out
- ☐ Other, specify
- ☐ None of the above

FI 08**Voluntary****Additional Assessed****PRI 1****FI 08.1**

Indicate which processes your organisation uses to ensure that fund criteria are not breached in corporate fixed income investments.

- ☒ Checks are performed to ensure that issuers meet the funds' screening criteria. These checks are:
 - ☒ Systematic
 - ☐ Occasional
- ☐ Automated IT systems prevent investment managers from investing in excluded bonds or those that do not meet positive screening criteria
- ☒ Audits of fund holdings are undertaken regularly by internal audit function
- ☐ Other, specify
- ☐ None of the above

FI 08.2

If breaches of fund screening criteria are identified, describe the process followed to correct those breaches.

Compliance with blacklists on the part of portfolio managers is enforced through IT systems for our equity holdings and it is technically not possible to purchase excluded stocks. Should a manager nonetheless seek to do so, our risk management team will receive a notification.

For our fixed income positions however, such ex ante blocking is not possible due to technical limitations. Here, through formal process instructions, our portfolio managers are required to consult blacklists before setting purchase orders. On a quarterly basis, holdings are subsequently checked for excluded securities on an ex post basis. This analysis is signed off by the CIO, and presented to risk management. Finally, blacklists and the internal communications aimed at enforcing them are part of our external ISAE3402 audits. If breaches are found however, bonds are sold immediately. Clients are notified and compensated if necessary.

(C) Implementation: Integration of ESG factors

FI 10

Voluntary

Descriptive

PRI 1

FI 10.1

Describe how you integrate ESG issues into investment decision-making processes.

ACTIAM has a longstanding history incorporating ESG considerations into all of its investment processes. As such, in depth specialist sector and theme knowledge and experience is present.

For fixed income investments, we currently work with an exclusion list (black list), a formal watch list, as well as other inputs such as alerts and news flow. In addition, we participate in joint engagement meetings. We are also actively involved in the green bonds market.

Making optimal use of the existing bodies of knowledge of ESG and portfolio management expertise, we are taking the integration one step further by consistently applying a ESG ranking methodology for all investment classes covered, both portfolios and benchmarks. This methodology, currently being rolled out, has been jointly developed by our ESG specialists and debt and equity portfolio managers as well as manager selection.

Applying this framework will facilitate and assure balanced investment decisions, taking into account both financial and non-financial aspects of any investment. It allows evaluation of the ESG active positions of portfolios relative to the benchmark and can be used in developing client specific ESG strategies with positive ESG biases.

Likewise to our equities approach, ESG specialists and portfolio managers closely work together in the engagement of companies invested in. There is also close cooperation between the two teams on the topic of green / climate bonds.

FI 11

Mandatory

Core Assessed

PRI 1

FI 11.1

Indicate if E, S and G issues are reviewed while researching companies and/or sectors in active strategies.

ESG issues	Coverage/extent of review on these issues
Environmental	<input checked="" type="radio"/> We systematically review the potential significance of environmental issues and investigate them accordingly <input type="radio"/> We occasionally review the potential significance of environmental issues and investigate them accordingly <input type="radio"/> We do not review environmental issues
Social	<input checked="" type="radio"/> We systematically review the potential significance of social issues and investigate them accordingly <input type="radio"/> We occasionally review the potential significance of social issues and investigate them accordingly <input type="radio"/> We do not review social issues
Corporate Governance	<input checked="" type="radio"/> We systematically review the potential significance of corporate governance issues and investigate them accordingly <input type="radio"/> We occasionally review the potential significance of corporate governance issues and investigate them accordingly <input type="radio"/> We do not review corporate governance issues

FI 12	Voluntary	Descriptive	PRI 1
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FI 12.1	Indicate which processes your organisation uses to ensure that ESG integration is based on a robust analysis.
---------	---

- ☒ Comprehensive ESG research is undertaken or sourced to determine companies' activities and products
- ☒ Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- ☒ Company information and/or ratings on ESG are updated regularly
- ☒ A periodic review of the quality of the research undertaken or provided is carried out
- ☐ Other, specify
- ☐ None of the above

FI 12.2	Describe how ESG information is held and used by your portfolio managers.
---------	---

- ☒ ESG information is held within centralised databases or tools and it is accessible by all relevant staff
- ☐ ESG information or analysis is a standard section or aspect of all company research notes or industry/sector analysis generated by investment staff
- ☐ Systematic records are kept that capture how ESG information and research was incorporated into investment decisions
- ☐ Other, specify
- ☐ None of the above

Fixed income - Government

FI 13	Mandatory	Core Assessed	PRI 1
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FI 13.1

Indicate if you incorporate ESG issues in investment analysis and decision making for your government fixed income investments.

☒ Yes

FI 13.2

Indicate for what percentage of your government fixed income investments you incorporate ESG issues in investment analysis and decision making.

- ☐ <10%
- ☐ 10-50%
- ☐ 51-90%
- ☒ >90%

FI 13.3

Indicate if in active strategies, E, S and G issues are reviewed while researching government issuers.

ESG issues	Coverage/extent of review on these issues
Environmental	<input type="radio"/> We systematically review the potential significance of environmental issues and investigate them accordingly <input checked="" type="radio"/> We occasionally review the potential significance of environmental issues and investigate them accordingly <input type="radio"/> We do not review environmental issues
Social	<input checked="" type="radio"/> We systematically review the potential significance of social issues and investigate them accordingly <input type="radio"/> We occasionally review the potential significance of social issues and investigate them accordingly <input type="radio"/> We do not review social issues
Corporate Governance	<input checked="" type="radio"/> We systematically review the potential significance of corporate governance issues and investigate them accordingly <input type="radio"/> We occasionally review the potential significance of corporate governance issues and investigate them accordingly <input type="radio"/> We do not review corporate governance issues

FI 13.4

Describe your approach to incorporating ESG issues in government fixed income investments. [Optional]

When reviewing government fixed income investments we use both screening and integration. The screening is based on our Fundamental Investment Principles and is explained more thoroughly in question FI 03. Based on the screening several countries are excluded from our investment portfolio:

- China (weapons; human rights, labour rights)
- Finland (weapons)
- Greece (weapons, corruption)
- Mexico (human rights)
- Poland (weapons)
- South Korea (weapons, human rights)
- Turkey (weapons)
- United States of America (production of controversial weapon systems)

Besides screening government fixed income investments on exclusion criteria like weapons and human rights, E, S and G issues are also used in the investment process. Portfolio managers use social and governance criteria like labour rights, GINI index, gender equality and health and safety to form an opinion on government bonds. The information is used as a positive selection tool and is completely incorporated in the final investment decision.

In 2014 we have been working on developing a model for further integration of ESG indicators in both fixed income and equities investments. This model will enable us to develop financial as well as non-financial objectives and report on progress to our clients. It will also enable us to create a portfolio measured versus an ESG weighted benchmark, a tool that will improve our impact measurements. This methodology will be further rolled out in 2015.

☐ No

ESG incorporation in passively managed fixed income

FI 14	Mandatory to Report Voluntary to Disclose	Gateway	PRI 1
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Fixed Income - Government

☒ Yes

FI 14.2b	Indicate the percentage of your total passive fixed income funds for which ESG issues are incorporated in the index construction methodology.
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	(% of total passive government fixed income funds)
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- ☒ <10%
- ☐ 10-50%
- ☐ 51-90%
- ☐ >90%

FI 14.3b	Specify index/fund name, provide a brief description of ESG methodology and indicate which of the following ESG incorporation strategy you apply.
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☒ Index/fund 1

Index and fund name and brief description of ESG methodology	ESG incorporation strategy
Customized index fund. Government bonds market weightings are determined based on how governments contribute to improving sustainability in society, as well as their ability to pay back debt and interest.	<input checked="" type="checkbox"/> Screening <input type="checkbox"/> Thematic <input checked="" type="checkbox"/> Integration of ESG issues <input type="checkbox"/> Other

☐ Index/fund 2

☐ Index/fund 3

☐ Index/fund 4

☐ Index/fund 5

☐ No

Outputs and outcomes

FI 15	Voluntary	Descriptive	PRI 1
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FI 15.1	Indicate how your ESG incorporation strategies have influenced the composition of your fixed income portfolio(s) or investment universe.
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Fixed Income - Corporate

- ☒ Narrow down or prioritise the investment universe
☒ Buy / sell / weight decisions
☐ Other, specify

FI 15.1	Indicate how your ESG incorporation strategies have influenced the composition of your fixed income portfolio(s) or investment universe.
---------	--

Fixed Income - Government

- ☒ Narrow down or prioritise the investment universe
☒ Buy / sell / weight decisions
☐ Other, specify

FI 16	Voluntary	Descriptive	PRI 1
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FI 16.1	Indicate whether your organisation measures how your approach to ESG issues in Fixed Income investments has affected financial and/or ESG performance.
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- ☒ We measure whether our approach to ESG issues impacts funds' financial performance

Fixed Income - Corporate

Describe the impact on:	Impact	Strategies considered
Funds' financial performance	<input checked="" type="radio"/> Positive <input type="radio"/> Negative <input type="radio"/> No impact <input type="radio"/> We do not measure the impact for this asset class	<input checked="" type="checkbox"/> Screening <input checked="" type="checkbox"/> Integration <input type="checkbox"/> Thematic

Fixed Income - Government

Describe the impact on:	Impact	Strategies considered
Funds' financial performance	<input checked="" type="radio"/> Positive <input type="radio"/> Negative <input type="radio"/> No impact <input type="radio"/> We do not measure the impact for this asset class	<input checked="" type="checkbox"/> ESG incorporation (actively managed funds) <input checked="" type="checkbox"/> Index construction (passively managed funds)

- ☐ We measure whether our approach to ESG issues impacts funds' risk or volatility
☐ We measure whether our approach to ESG issues impacts funds' ESG performance
☐ None of the above

FI 16.2

Describe how you are able to determine these outcomes.

By excluding countries and companies, ACTIAM creates an upfront bias versus all client benchmarks. We can measure the impact of that bias by comparing performance of the benchmark with and without the entities that we have excluded. ACTIAM believes that the performance attributed by this bias will be positive in the long run. In recent history Greece was also excluded due to our weapons and corruption criteria. This contributed positively to our clients' relative and absolute performance. Medio 2009 Greece accounted for 3% of the broad iBoxx EUR overall benchmark. A 30% loss on the bonds was visible before bonds were downgraded to below investment grade and removed from the index.

In 2014 we have been working on developing a model for further integration of ESG indicators in both fixed income and equities investments. This model will enable us to develop financial as well as non-financial objectives and report on progress to our clients. It will also enable us to create a portfolio measured versus an ESG weighted benchmark, a tool that will improve our impact measurements. This methodology will be further rolled out in 2015.

FI 17	Voluntary	Descriptive	PRI 1
FI 17.1	Provide examples of ESG issues that affected your fixed income investment view and/or performance during the reporting year.		

- ☒ ESG issue 1

	Fixed Income - Corporate and/or Government
<input checked="" type="checkbox"/> Corporate <input type="checkbox"/> Government	
	ESG issue and explanation
Oil company - social	
	ESG incorporation strategy applied
<input checked="" type="checkbox"/> Screening <input type="checkbox"/> Thematic <input type="checkbox"/> Integration <input type="checkbox"/> Combination of ESG incorporation strategies <input type="checkbox"/> Index incorporating ESG issues	
	Impact on investment view or performance
<p>We excluded an oil company from investment. Too many (fatal) accidents were happening at the sites of this company. Improvement was promised and new policies were adopted, but this has not (yet) led to observable results.</p>	

☒ ESG issue 2

	Fixed Income - Corporate and/or Government
<input type="checkbox"/> Corporate <input checked="" type="checkbox"/> Government	
	ESG issue and explanation
EU Country- violation of our Fundamental investment Principles based on our nuclear weapons criteria.	
	ESG incorporation strategy applied
<input checked="" type="checkbox"/> Screening <input type="checkbox"/> Thematic <input type="checkbox"/> Integration <input type="checkbox"/> Combination of ESG incorporation strategies <input type="checkbox"/> Index incorporating ESG issues	
	Impact on investment view or performance
The country is excluded and so government bonds of this country are not part of our investment universe.	

☒ ESG issue 3

	Fixed Income - Corporate and/or Government
<input type="checkbox"/> Corporate <input checked="" type="checkbox"/> Government	
	ESG issue and explanation
Regional government - environment.	
	ESG incorporation strategy applied
<input type="checkbox"/> Screening <input type="checkbox"/> Thematic <input type="checkbox"/> Integration <input checked="" type="checkbox"/> Combination of ESG incorporation strategies <input type="checkbox"/> Index incorporating ESG issues	
	Impact on investment view or performance
This institution issued a green bond. ACTIAM researches green bonds on a case-by-case basis to check if they adhere to our green bonds policy. As the green bond met all of our criteria and the issuer was not excluded by ACTIAM, we decided to buy the bond.	

☒ ESG issue 4

	Fixed Income - Corporate and/or Government
<input type="checkbox"/> Corporate <input checked="" type="checkbox"/> Government	
	ESG issue and explanation
Development Bank.	
	ESG incorporation strategy applied
<input type="checkbox"/> Screening <input type="checkbox"/> Thematic <input type="checkbox"/> Integration <input checked="" type="checkbox"/> Combination of ESG incorporation strategies <input type="checkbox"/> Index incorporating ESG issues	
	Impact on investment view or performance
<p>The bank issued a green bonds, of which proceeds are going to clean energy projects. Thus low carbon energy will be stimulated. ACTIAM researches green bonds on a case-by-case basis and found that both the issuer and the bond adhere to our ESG and green bond criteria.</p>	

☒ ESG issue 5

	Fixed Income - Corporate and/or Government
<input checked="" type="checkbox"/> Corporate <input type="checkbox"/> Government	
	ESG issue and explanation
Involvement with controversial weapons.	
	ESG incorporation strategy applied
<input checked="" type="checkbox"/> Screening <input type="checkbox"/> Thematic <input type="checkbox"/> Integration <input type="checkbox"/> Combination of ESG incorporation strategies <input type="checkbox"/> Index incorporating ESG issues	
	Impact on investment view or performance
This company is involved with the production of cluster munition. Investment in companies involved with the production of cluster munition is forbidden in the Netherlands and prohibited by our Fundamental Investment Principles. The company was therefore excluded from investment.	

Communication

FI 18	Mandatory	Core Assessed	PRI 2,6
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FI 18.1	Indicate if your organisation proactively discloses information on your approach to ESG incorporation in all fixed income investments.
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☒ We disclose it publicly

	Provide URL
--	-------------

<http://www.actiam.nl/en/>

FI 18.2	Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.
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☐ Yes

☒ No

FI 18.3

Indicate the information your organisation proactively discloses to the public regarding your approach to ESG incorporation.

- ☒ Broad approach to ESG incorporation
- ☐ Detailed explanation of ESG incorporation strategy used

FI 18.4

Indicate how frequently you typically report this information to the public.

- ☒ Quarterly or more frequently
- ☐ Between quarterly and annually
- ☐ Less frequently than annually
- ☐ Other, specify

FI 18.5

Indicate the information your organisation proactively discloses to clients/ beneficiaries regarding your approach to ESG incorporation.

- ☐ Broad approach to ESG incorporation
- ☒ Detailed explanation of ESG incorporation strategy used

FI 18.6

Indicate how frequently you typically report this information to clients/beneficiaries

- ☒ Quarterly or more frequently
- ☐ Between quarterly and annually
- ☐ Less frequently than annually
- ☐ Other, specify
- ☐ We disclose it to clients/beneficiaries only
- ☐ We do not proactively disclose it to the public and/or clients/beneficiaries

Engagement in fixed income investments

Fixed Income - Corporate

FI 19**Voluntary****Descriptive****PRI 2****FI 19.1**

Indicate if you engage with corporate issuers.

- ☒ Yes

FI 19.2

Describe your organisation's approach to engagement in corporate fixed income.

Our approach to engagement with Fixed income - corporates is the same as for engagements with equities. Please check question LEI 01.1

- ☐ No

Fixed Income - Government

FI 20	Voluntary	Descriptive	PRI 2
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FI 20.1	Indicate if you engage with government issuers such as government departments (national or local), agencies and other entities in order to influence their approach to ESG issues that may affect creditworthiness.
----------------	---

☒ Yes

FI 20.2	Please describe your organisation's approach to engagement in government fixed income.
----------------	--

ACTIAM has an alternate board position in the Extractive Industries Transparency Initiative (EITI). As such, we stimulate governments to improve extractives-related ESG issues through this initiative. In addition, we engage with governments through investor statements such as the EU 2030 declaration, investor statement on EU conflict minerals legislation, etc. As part of our green bonds policy, we often talk to governments or sub-sovereigns and discuss how they can improve their ESG performance.

☐ No

ACTIAM

Reported Information

Public version

Direct - Inclusive Finance

PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

Context

IFD 01	Voluntary	Descriptive	PIIF General
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IFD 01.1	Indicate if you have a distinct mission and investment objective for your investment in inclusive finance.
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☒ Yes

IFD 01.2	Describe your inclusive finance mission and investment objective.
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ACTIAM Impact Investing is the development investments entity of ACTIAM. Since 2007 ACTIAM develops and manages Impact Investing Funds. The committed capital of the ACTIAM Impact Investing funds is EUR 0.4 billion. Through its professional funds it invests in social development all over the globe, and aims to combine a market rate return with a demonstrable contribution to a better world. ACTIAM Impact Investing creates value for its clients, for the investees and for society by developing, promoting and/ or distributing impact investment solutions. Impact investment solutions are typically accomplished by way of funds, but may also involve impact investment mandates and impact advisory services. ACTIAM Impact Investing currently manages three institutional microfinance funds and one Small and Medium Enterprise Finance fund. The inclusive finance mission of these funds is to:

- Improve access to finance for low income people in developing and emerging economies and for SMEs;
- Enhance the capacity of the clients of the financial institutions (including MFIs) to manage their financial affairs in a responsible way;
- Prompt financial institutions - including MFIs - to improve the quality of their reporting on financial and nonfinancial performance according to generally agreed upon standards; and
- Prompt financial institutions - including MFIs - to increase their transparency and optimally protect the interests of their clients.

Besides the self-originated institutional microfinance funds, due to becoming the AIF Manager for a particular fund range, Impact Investing manages an additional EUR 0.6 billion mainly retail originated open ended funds investing in microfinance and energy focused projects. ACTIAM Impact Investing is responsible for daily management of these funds, excluding marketing and non-financial performance policies and activities.

☐ No

IFD 02	Voluntary	Descriptive	PIIF General
--------	-----------	-------------	--------------

IFD 02.1	Provide a brief description of the governance and management structures and processes you have in place for your responsible investment activities and implementation of the PIIF.
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Within ACTIAM Impact Investing responsible investment is key to all our activities, which means everybody in the team is committed to the PIIF. The ACTIAM II Investment Committee decides on actual investments based on an integral assessment of the potential (financial and non-financial) risks and returns. In addition, the ACTIAM Fund Management Committee monitors the development of these risks and returns once the investments have been made. One of the managing directors of ACTIAM Impact Investing bears responsibility for Impact Management related activities. He is responsible for the Responsibility & Impact Frameworks for all funds launched by ACTIAM Impact Investing and he oversees the integration of the non-financial and impact criteria in the investment process. The responsible managing director is supported by an Investment Committee member and together they take care of the integration of the PIIF in all relevant policies and investment procedures. The board of ACTIAM bears the final responsibility for all impact investing related activities.

☐ I would like to attach an organisation chart (the following image formats can be uploaded: .jpg, .jpeg, .png, .bmp and .gif)

IFD 03	Voluntary	Descriptive	PIIF General
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IFD 03.1	Indicate if you set social targets for your organisation, specific to inclusive finance.
----------	--

☒ Yes

☐ No

IFD 03.2	Additional information.
----------	-------------------------

The social mission of ACTIAM Impact Investing is to create value for our clients, for the investees and for society by developing, promoting and/ or distributing impact investment solutions. Our social target is to increase access to responsible financial services for people and SME companies excluded from or restricted in their access to traditional banks. We try to do this through the following commitments:

Responsibly increase the size of MFIs' microfinance loan book, supporting their growth ambitions helping them to expand product lines, manage currency risk, and enhance their capital structure. (b) Enable the MFIs to extend the maturity profile and the average maturity of their funding, in order to help mitigate potential refunding risks, (c) Raise the visibility of microfinance among mainstream investors

(d) Familiarize MFIs with more sophisticated financing techniques, promoting professionalization of the Treasury function within the MFI industry (e) Raise micro entrepreneur income levels

Responsibly increase the size of SME loans through investments in financial institutions in emerging and developing markets, helping them to expand product lines, manage currency risk, and enhance their capital structure. (b) Raise the visibility of SME finance among mainstream investors (c) Promote the professionalization of the financial institutions with regard to SME finance, including social and environmental performance.

IFD 04	Mandatory to Report Voluntary to Disclose	Gateway	PIIF General
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IFD 04.1	Of your total assets invested directly in inclusive finance, indicate what percentage is invested in the following:
----------	---

Equity	<input type="radio"/> 0% <input checked="" type="radio"/> <20% <input type="radio"/> 20-40% <input type="radio"/> 41-60% <input type="radio"/> 61-80% <input type="radio"/> >80%
Debt	<input type="radio"/> 0% <input type="radio"/> <20% <input type="radio"/> 20-40% <input type="radio"/> 41-60% <input type="radio"/> 61-80% <input checked="" type="radio"/> >80% <div style="background-color: #0070C0; color: white; padding: 2px; margin-top: 5px;">Of which, subordinated debt</div> <input type="checkbox"/> 0% <input checked="" type="checkbox"/> <20% <input type="checkbox"/> 20-40% <input type="checkbox"/> 41-60% <input type="checkbox"/> 61-80% <input type="checkbox"/> >80%
Guarantees	<input type="radio"/> 0% <input checked="" type="radio"/> <20% <input type="radio"/> 20-40% <input type="radio"/> 41-60% <input type="radio"/> 61-80% <input type="radio"/> >80%
	<input checked="" type="radio"/> 0% <input type="radio"/> <20% <input type="radio"/> 20-40% <input type="radio"/> 41-60% <input type="radio"/> 61-80% <input type="radio"/> >80%
Total	100%

IFD 05	Mandatory to Report Voluntary to Disclose	Gateway	PIIF General
--------	---	---------	--------------

IFD 05.1	Of your total assets invested directly in inclusive finance, indicate what percentage is invested in the following:
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Microfinance		<input type="checkbox"/> 0% <input type="checkbox"/> <20% <input type="checkbox"/> 20-40% <input type="checkbox"/> 41-60% <input checked="" type="checkbox"/> 61-80% <input type="checkbox"/> >80%
<div>SME finance (provide your definition of SME)</div> <div>See IFD 05.02</div>		<input type="checkbox"/> 0% <input checked="" type="checkbox"/> <20% <input type="checkbox"/> 20-40% <input type="checkbox"/> 41-60% <input type="checkbox"/> 61-80% <input type="checkbox"/> >80%
		<input checked="" type="checkbox"/> 0% <input type="checkbox"/> <20% <input type="checkbox"/> 20-40% <input type="checkbox"/> 41-60% <input type="checkbox"/> 61-80% <input type="checkbox"/> >80%
Total		100%

IFD 05.2	Additional information. [Optional]
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Definition SME:

Small and medium enterprises are typically defined as enterprises with a maximum in total revenues and/or total assets of at most the equivalent of fifteen million USD and a maximum of the three hundred employees. The relevant maximum may vary from country to country.

IFD 06	Mandatory to Report Voluntary to Disclose	Descriptive	PIIF General
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IFD 06.1	Indicate if you track the geographical spread of your total assets invested directly in microfinance.
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☒ Yes

IFD 06.2

Of your total assets invested directly in microfinance, indicate the geographic spread as a percentage of your portfolio.

- ☐ Western Europe
- ☒ Eastern Europe & Central Asia

% of portfolio	Indicate the average loan size (in US\$) of your investees to active borrowers in this region.
<input type="checkbox"/> <20% <input checked="" type="checkbox"/> 20-40% <input type="checkbox"/> 41-60% <input type="checkbox"/> 61-80% <input type="checkbox"/> >80%	2873 <input type="checkbox"/> We do not track this information

- ☐ North America
- ☒ Latin America (includes Central and South America) & Caribbean

% of portfolio	Indicate the average loan size (in US\$) of your investees to active borrowers in this region.
<input type="checkbox"/> <20% <input checked="" type="checkbox"/> 20-40% <input type="checkbox"/> 41-60% <input type="checkbox"/> 61-80% <input type="checkbox"/> >80%	1890 <input type="checkbox"/> We do not track this information

- ☒ East Asia & Pacific

% of portfolio	Indicate the average loan size (in US\$) of your investees to active borrowers in this region.
<input checked="" type="checkbox"/> <20% <input type="checkbox"/> 20-40% <input type="checkbox"/> 41-60% <input type="checkbox"/> 61-80% <input type="checkbox"/> >80%	1268 <input type="checkbox"/> We do not track this information

- ☒ South Asia

% of portfolio	Indicate the average loan size (in US\$) of your investees to active borrowers in this region.
<input checked="" type="checkbox"/> <20% <input type="checkbox"/> 20-40% <input type="checkbox"/> 41-60% <input type="checkbox"/> 61-80% <input type="checkbox"/> >80%	1268 <input type="checkbox"/> We do not track this information

☒ Middle East & North Africa

% of portfolio	Indicate the average loan size (in US\$) of your investees to active borrowers in this region.
<input checked="" type="checkbox"/> <20% <input type="checkbox"/> 20-40% <input type="checkbox"/> 41-60% <input type="checkbox"/> 61-80% <input type="checkbox"/> >80%	722 <input type="checkbox"/> We do not track this information

☒ Sub-Saharan Africa

% of portfolio	Indicate the average loan size (in US\$) of your investees to active borrowers in this region.
<input checked="" type="checkbox"/> <20% <input type="checkbox"/> 20-40% <input type="checkbox"/> 41-60% <input type="checkbox"/> 61-80% <input type="checkbox"/> >80%	722 <input type="checkbox"/> We do not track this information

☐ No

PIIF Principle 1: Range of services

IFD 07	Mandatory	Core Assessed	PIIF 1
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Possible action:

Develop and extend the range of financial services available to low-income populations. Extensions could include savings, loans, insurance, payment services, remittance facilities and pension plans.

IFD 07.1	Indicate if you track the percentage of your microfinance investees' portfolio that is in microenterprise loans.
----------	--

☒ Yes, we track

If you aggregate this information at an organisational level, indicate the percentage of your portfolio in microenterprise loans. [Optional]

- ☐ <20%
- ☐ 20-40%
- ☐ 41-60%
- ☒ 61-80%
- ☐ >80%

- ☐ No, we do not track
- ☐ Not applicable (there are no microenterprise loans in the portfolio)

IFD 07.2

Indicate if you track the percentage of your microfinance investees' portfolio that is in loans for immediate household needs (i.e. consumer loans).

- ☒ Yes, we track

If you aggregate this information at an organisational level, indicate the percentage of your portfolio in loans for immediate household needs. [Optional]:

- ☒ <20%
- ☐ 20-40%
- ☐ 41-60%
- ☐ 61-80%
- ☐ >80%

- ☐ No, we do not track
- ☐ Not applicable (there are no loans for immediate household needs in the portfolio)

IFD 07.3

Indicate if you track the percentage of your investees' portfolio in housing loans.

- ☒ Yes, we track

If you aggregate this information at an organisational level, indicate the percentage of your portfolio in loans for other categories. [Optional]

- ☒ <20%
- ☐ 20-40%
- ☐ 41-60%
- ☐ 61-80%
- ☐ >80%

- ☐ No, we do not track
- ☐ Not applicable (there are no loans for housing in the portfolio)

IFD 08

Mandatory

Core Assessed

PIIF 1

IFD 08.1

In your microfinance portfolio, indicate if you support the provision of financial services beyond credit, compulsory savings and/or compulsory insurance.

- ☒ Yes

IFD 08.2

Indicate which of the following services you support:

☒ Voluntary savings products

Provide examples of how and what you support.

We encourage MFIs to offer saving products if they are allowed to under local regulations.

Indicate if you gather data regarding the percentage of financial service providers in your portfolio that are offering such a service.

☒ Yes

If you aggregate this information at an organisational level, indicate the percentage of microfinance providers in the MIV or organisational direct portfolio offering such products.

- ☐ <20%
☐ 20-40%
☒ 41-60%
☐ 61-80%
☐ >80%

☐ No☒ Voluntary insurance products

Provide examples of how and what you support.

Through a program called FINISH, ACTIAM II supports MFIs in India and Kenya to cooperate with insurance companies and to offer health insurance to their clients. We do gather data of our portfolio MFIs that offer insurance products.

Indicate if you gather data regarding the percentage of financial service providers in your portfolio that are offering such a service.

☒ Yes

If you aggregate this information at an organisational level, indicate the percentage of microfinance providers in the MIV or organisational direct portfolio offering such products.

- ☐ <20%
☒ 20-40%
☐ 41-60%
☐ 61-80%
☐ >80%

☐ No☒ Other financial services, specify

e.g. mobile banking, microleasing

Provide examples of how and what you support.

We encourage MFIs to provide full financial services to their clients, based on the needs of clients in a specific region. We do gather data of our portfolio MFIs that offer other financial products.

Indicate if you gather data regarding the percentage of financial service providers in your portfolio that are offering such a service.

☒ Yes

If you aggregate this information at an organisational level, indicate the percentage of microfinance providers in the MIV or organisational direct portfolio offering such products.

- ☒ <20%
☐ 20-40%
☐ 41-60%
☐ 61-80%
☐ >80%

☐ No

☒ Non-financial services, specify

Reporting non-financial products

Provide examples of how and what you support.

We encourage MFIs to provide complementary non-financial services to the financial services they offer to their clients, based on the needs of clients in a specific region. We do gather data of our portfolio MFIs that offer other financial products.

Indicate if you gather data regarding the percentage of financial service providers in your portfolio that are offering such a service.

☒ Yes

If you aggregate this information at an organisational level, indicate the percentage of microfinance providers in the MIV or organisational direct portfolio offering such products.

- ☐ <20%
☐ 20-40%
☐ 41-60%
☒ 61-80%
☐ >80%

☐ No

☐ No

IFD 09

Voluntary

Additional Assessed

PIIF 1

Possible action:

Encourage providers to introduce innovative products tailored to needs of low-income clients.

Encourage providers to expand their service offering to more remote areas and more vulnerable populations.

IFD 09.1	Indicate if you support the introduction of services tailored to the following client groups.
----------	---

Client groups	Yes/No
The very poor	<p><input checked="" type="radio"/> Yes</p> <div>Describe how you support the introduction of such services.</div> <p>We assess whether the organisation has a policy and uses a poverty assessment tool to screen potential clients or assess client income level during the loan process. The Fund invests in MFIs that provide loans to the very poor, the poor and low-income clients.</p> <div>Indicate what percentage of assets you know to be supporting these clients.</div> <p> <input type="checkbox"/> 0% <input checked="" type="checkbox"/> <20% <input type="checkbox"/> 20-40% <input type="checkbox"/> 41-60% <input type="checkbox"/> 61-80% <input type="checkbox"/> >80% <input type="radio"/> We track at the investee level but do not aggregate this information <input checked="" type="radio"/> We do not track at the investee level <input type="radio"/> No </p>
The poor	<p><input checked="" type="radio"/> Yes</p> <div>Describe how you support the introduction of such services.</div> <p>We assess whether the organisation has a policy and uses a poverty assessment tool to screen potential clients or assess client income level during the loan process. The Fund invests in MFIs that provide loans to the very poor, the poor and low-income clients.</p> <div>Indicate what percentage of assets you know to be supporting these clients.</div> <p> <input type="checkbox"/> 0% <input type="checkbox"/> <20% <input checked="" type="checkbox"/> 20-40% <input type="checkbox"/> 41-60% <input type="checkbox"/> 61-80% <input type="checkbox"/> >80% <input type="radio"/> We track at the investee level but do not aggregate this information <input checked="" type="radio"/> We do not track at the investee level <input type="radio"/> No </p>
Low income clients	<p><input checked="" type="radio"/> Yes</p> <div>Describe how you support the introduction of such services.</div>

	<p>We assess whether the organisation has a policy and uses a poverty assessment tool to screen potential clients or assess client income level during the loan process. The Fund invests in MFIs that provide loans to the very poor, the poor and low-income clients.</p>
	<p>Indicate what percentage of assets you know to be supporting these clients.</p> <p> <input type="checkbox"/> 0% <input type="checkbox"/> <20% <input type="checkbox"/> 20-40% <input checked="" type="checkbox"/> 41-60% <input type="checkbox"/> 61-80% <input type="checkbox"/> >80% <input type="radio"/> We track at the investee level but do not aggregate this information <input checked="" type="radio"/> We do not track at the investee level <input type="radio"/> No </p>
	<p> <input type="radio"/> Yes <input checked="" type="radio"/> No </p>

IFD 09.2	Indicate if you collect data regarding the percentage or number of total active clients that are:
-----------------	---

	Rural
--	-------

☒ Yes

	Indicate what percentage of your direct portfolio this represents
--	---

- ☐ <20%
☒ 20-40%
☐ 41-60%
☐ 61-80%
☐ >80%

☐ No

	Urban
--	-------

☒ Yes

	Indicate what percentage of your direct portfolio this represents
--	---

- ☐ <20%
☐ 20-40%
☐ 41-60%
☒ 61-80%
☐ >80%

☐ No

	Female
--	--------

☒ Yes

	Indicate what percentage of your direct portfolio this represents
--	---

- ☐ <20%
☐ 20-40%
☐ 41-60%
☒ 61-80%
☐ >80%

☐ No

IFD 10	Voluntary	Descriptive	PIIF 1
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Possible action:

Supporting retail providers.

IFD 10.1	Indicate if you provide technical assistance to your investees.
----------	---

☒ Yes

☐ No

IFD 10.2	Additional information.
----------	-------------------------

There is no specific Technical Assistance budget for investments made through the ACTIAM Institutional Microfinance Funds nor in our SMEFF. In our SME proposition our investment manager FMO takes care of this in order to reduce ESG risks as much as possible.

PIIF Principle 2: Client protection

IFD 11	Mandatory	Core Assessed	PIIF 2
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Possible action:

Publicly endorse the Client Protection Principles (CPP).

IFD 11.1	Indicate if you have publicly endorsed the Client Protection Principles.
-----------------	--

- ☒ Yes
☐ No

IFD 12	Voluntary	Additional Assessed	PIIF 2
---------------	------------------	----------------------------	---------------

IFD 12.1	Indicate if you provide training or assistance for your investees in implementing the Client Protection Principles and/or other client protection measures.
-----------------	---

- ☒ Yes
☐ No

IFD 12.2	Additional information.
-----------------	-------------------------

ACTIAM Impact Investing strongly encourages MFIs to endorse the CPP and to make them operational. Compliance and implementation of client protection measures is included in the loan agreement with MFIs. There is no Technical Assistance budget for the ACTIAM Institutional Microfinance Funds or ACTIAM-FMO SME Finance Fund. Nevertheless, our investment managers do assist MFIs in implementing the CPP through ongoing conversations with the MFIs. This is, however, an informal process.

IFD 13	Mandatory	Core Assessed	PIIF 2
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IFD 13.1	Indicate if you include the Client Protection Principles and/or other client protection measures in your investment policies.
-----------------	---

- ☒ Yes

IFD 13.2	Indicate if this is systematically applied.
-----------------	---

	During due diligence
--	----------------------

- ☒ Yes
☐ No

	In covenants in loan agreements and/or in financing or shareholder agreements
--	---

- ☒ Yes
☐ No

IFD 13.3	Indicate if you encourage investees to apply for Client Protection Certification. [Optional]
-----------------	--

- ☒ Yes
☐ No
☐ No

PIIF Principle 3: Fair treatment

IFD 14	Mandatory	Core Assessed	PIIF 3
--------	-----------	---------------	--------

Possible action:

Provide financing in an appropriate currency and tenor.

IFD 14.1	In relation to your direct portfolio in debt, indicate if you provide investment in local currency.
----------	---

☒ Yes

IFD 14.2	Indicate what percentage of your direct portfolio in debt is invested in the investee's local currency.
----------	---

- ☐ <20%
☒ 20-40%
☐ 41-60%
☐ 61-80%
☐ >80%

☐ No

IFD 14.3	Additional information. [Optional]
----------	------------------------------------

For the SME proposition the first, fully hedged, loan in local currency was provided recently.

IFD 15	Mandatory	Descriptive	PIIF 3
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Possible action:

Provide financing in an appropriate currency and tenor.

Actively support the building of a diversified funding base.

IFD 15.1	In relation to your direct portfolio in debt, indicate what percentage have a maturity (from the point of investment) of the specified duration:
----------	--

- ☐ 12 months or fewer
☐ 13 to 24 months
☒ 25 to 60 months

	Indicate percentage
--	---------------------

- ☐ <20
☐ 20-40%
☒ 41-60%
☐ 61-80%
☐ >80%
☐ Over 60 months

IFD 15.2	Indicate if you have a set limit regarding the maximum fixed income investment exposure of the investees in which you invest. [Optional]
----------	--

- ☒ Yes
☐ No

IFD 15.3	Additional information. [Optional]
----------	------------------------------------

For Microfinance a tenor of 2 - 3 years, for SME 3 - 5 years.

IFD 17	Mandatory	Core Assessed	PIIF 3
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Possible action:

Negotiate terms and conditions that are transparent, fair and reasonable, including fair break-up clauses.

IFD 17.1	Indicate if you adopt the following practices:
----------	--

- ☒ For fixed income investments: Use the Lenders' Guidelines for Setting Covenants in Support of Responsible Microfinance as an example or reference document.

	Indicate if these practices are formalised in written policies and procedures.
--	--

- ☒ Yes
☐ No

- ☒ Ensure that the investee understands the terms, covenants and their implications prior to signing loan / shareholder documentation.

	Describe your process.
--	------------------------

Please refer to IFD 17.2 for additional information.

	Indicate if these practices are formalised in written policies and procedures.
--	--

- ☒ Yes
☐ No

- ☒ Foster trust and proactive dialogue with investees through straightforward discussions on issues such as a covenant breach.

	Describe your process.
--	------------------------

Please refer to IFD 17.2 for additional information.

	Indicate if these practices are formalised in written policies and procedures.
--	--

- ☒ Yes
☐ No

- ☒ In the case of material covenant breach, create/participate in a voluntary workout group where applicable, with the goal to help the investee remain a going concern whenever possible.

Indicate if these practices are formalised in written policies and procedures.

☒ Yes

☐ No

☒ For fixed income investments: Train your staff on effective monitoring and covenant waiver negotiations to manage deteriorating conditions, and transition a non-performing loan from loan origination staff to specialised workout staff.

Indicate if these practices are formalised in written policies and procedures.

☒ Yes

☐ No

☒ Encourage investee skills-building on financial projections, scenario planning and stress-testing for management, and on financial expertise and governance for Directors.

Indicate if these practices are formalised in written policies and procedures.

☒ Yes

☐ No

☐ Other (explain)

☐ None of the above

IFD 17.2

Additional information. [Optional]

During the due diligence process and in the terms sheet preceding the loan agreement the terms and covenants are explicitly mentioned and discussed with the investee.

The investees are monitored on a monthly basis and their portfolio development is proactively watched. In case of signals of issues the investee is asked to elaborate on the situation and we seek how to support the MFI in solving the issues. A possible outcome could be a restructuring to give the MFI time to recover.

PIIF Principle 4: Responsible investment

IFD 18

Mandatory

Gateway

PIIF 4

Possible action:

Negotiate terms and conditions that are transparent, fair and reasonable, including fair break-up clauses.

IFD 18.1

Indicate if you use the following tools for social performance reporting:

Externally developed tools

	During due diligence.
--	-----------------------

- ☒ Yes
- ☐ No
- ☐ We don't track social performance

	For monitoring and reporting purposes.
--	--

- ☒ Yes
- ☐ No
- ☐ We don't track social performance

	Describe the approaches used and frequency of use.
--	--

The social indicators developed by MIX Market, IRIS and the Universal Performance Standards for Social Performance Management are integrated in the Non-Financial Scorecard which is used during due diligence and monitored on annual basis. This information is used to report non-financial performance of the Funds to our investors.

In-house tools based on externally developed tools

	During due diligence.
--	-----------------------

- ☒ Yes
- ☐ No
- ☐ We don't track social performance

	For monitoring and reporting purposes.
--	--

- ☒ Yes
- ☐ No
- ☐ We don't track social performance

	Describe the approaches used and frequency of use.
--	--

We developed a Non-Financial Scorecard (based on industry standards, and in cooperation with Oikocredit). This tool is used as assessment tool during due diligence, annual monitoring and the information is used for reporting purposes.

Tools developed solely in-house

	During due diligence.
--	-----------------------

- ☒ Yes
- ☐ No
- ☐ We don't track social performance

	For monitoring and reporting purposes.
--	--

- ☒ Yes
- ☐ No
- ☐ We don't track social performance

	Describe the approaches used and frequency of use.
--	--

The content of the Non-Financial Scorecard is based on externally developed tools, but the methodology is developed in-house.

IFD 19	Mandatory	Descriptive	PIIF 4
--------	-----------	-------------	--------

IFD 19.1	Indicate if you require the retail institutions in which you invest to have an independent financial rating.
----------	--

- ☐ Always
- ☐ In a majority of cases
- ☒ In a minority of cases
- ☐ No

IFD 19.2	Indicate if you require the retail institutions in which you invest to have an independent social rating.
----------	---

- ☐ Always
- ☐ In a majority of cases
- ☒ In a minority of cases
- ☐ No

IFD 19.3	Indicate if you require the retail institutions in which you invest to have an independent social audit.
----------	--

- ☐ Yes
- ☒ No

IFD 20	Mandatory	Core Assessed	PIIF 4
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Possible action:

Assist in developing appropriate references for corporate governance issues.

IFD 20.1

In relation to your due diligence on and monitoring and reporting of corporate governance among investees, indicate if you assess:

Compensation of the Board of Directors and Executive Directors (i.e. its transparency, the use of benchmarking)**Pre-investment**

- ☒ Yes
- ☐ No
- ☐ Not for all of our investments in inclusive finance

Post-investment

- ☒ Yes
- ☐ No
- ☐ Not for all of our investments in inclusive finance

Describe what you look at and, if post-investment, the frequency of assessment. [Optional]

We analyse the fairness of the compensation of the boards and the management compared to other employees in the company and to general standards of fairness. Also the absolute level of compensation is taken into account during the investment selection process and during the monitoring process.

Composition of the Board (i.e. breadth and depth of experience, effective client representation, diversity)**Pre-investment**

- ☒ Yes
- ☐ No
- ☐ Not for all of our investments in inclusive finance

Post-investment

- ☒ Yes
- ☐ No
- ☐ Not for all of our investments in inclusive finance

Describe what you look at and, if post-investment, the frequency of assessment. [Optional]

Assessed during annual monitoring visits.

Whether the Board receives social performance management-related information from the management team that is analysed and contributes to Board decision making.

	Pre-investment
--	----------------

- ☒ Yes
- ☐ No
- ☐ Not for all of our investments in inclusive finance

	Post-investment
--	-----------------

- ☒ Yes
- ☐ No
- ☐ Not for all of our investments in inclusive finance

	Describe what you look at and, if post-investment, the frequency of assessment. [Optional]
--	--

Assessed during annual monitoring visits.

IFD 21	Voluntary	Descriptive	PIIF 4
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Possible action:

Assist in developing appropriate references for corporate governance issues.

IFD 21.1	Indicate if you provide training or assistance for your investees on corporate governance.
----------	--

- ☒ Yes
- ☐ No

IFD 21.2	Additional information.
----------	-------------------------

For the ACTIAM Institutional Microfinance Funds and the ACTIAM-FMO SME Finance Fund there is no specific budget for training available, but our investment managers assist MFIs and SME Banks on corporate governance issues through ongoing conversations with the management of the investees.

IFD 23	Mandatory	Descriptive	PIIF 4
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Possible action:

Assist in developing appropriate references for environmental issues.

IFD 23.1

Indicate if you have a procedure to integrate the consideration of environmental issues in your investment decision processes.

- ☒ Yes
 - ☒ For all inclusive finance investments
 - ☐ For a majority of inclusive finance investments
 - ☐ For a minority of inclusive finance investments

IFD 23.2

Describe how your procedure to integrate the consideration of environmental issues in your investment decisions processes affect decisions pre-investment. [Optional]

During the due diligence process the MFI is assessed on compliance with environmental regulation. In addition, the environmental policies of the MFI are assessed. If there is evidence of the MFI breaching environmental regulations, this can impact the investment approval process. In our SME proposition, we address the environmental (and social) risks involved.

IFD 23.3

Describe how your procedure to integrate the consideration of environmental issues in your investment decisions processes affect decisions post- investment. [Optional]

Compliance with environmental regulation and policies is included in the Non-Financial Scorecard, which will be assessed on an annual basis. If breaches are uncovered this can impact refinancing decisions.

- ☐ No

IFD 23.4

Indicate if you request your investees to comply with an environmental exclusion list.

- ☒ Yes, for all investees
- ☐ Yes, for a majority of investees
- ☐ Yes, for a minority of investees
- ☐ No

IFD 24

Voluntary

Additional Assessed

PIIF 4

Possible action:

Promote implementation of anti-corruption practices.

IFD 24.1

Indicate if you have anti-corruption policies.

- ☒ Yes, published
- ☐ Yes, but not published
- ☐ No

IFD 24.2

Indicate if you have internal whistle-blowing policies.

- ☒ Yes, published
- ☐ Yes, but not published
- ☐ No

IFD 24.3	Indicate if you review whether your investees have anti-corruption policies as part of your due diligence process.
----------	--

- ☒ Yes
☐ No

IFD 24.4	Indicate if you review whether your investees have internal whistle-blowing policies as part of your due diligence process.
----------	---

- ☒ Yes
☐ No

IFD 24.5	Additional information.
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The MFI loan agreements state the following: The Borrower will at all times institute, maintain and comply with internal procedures and controls satisfactory to the Lender for the purpose of preventing the Borrower from being used for money laundering, the financing of terrorist activity, fraud, or other corrupt or illegal purposes or practices. In the due diligence process, the company's policies, looking for anti-corruption and whistle-blowing policies are reviewed as a standard procedure. Regarding our SME Fund we apply a similar policy stance.

PIIF Principle 5: Transparency

IFD 25	Voluntary	Additional Assessed	PIIF 5
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Possible action:

Fully disclose policies, criteria and related conditions of products and services to investees and other relevant stakeholders.

IFD 25.1	Indicate how your mission and investment objectives communicated to stakeholders (e.g. investees, investors).
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- ☒ Publicly

Provide a URL

<http://www.actiam.nl/nl/producten-en-diensten/impact-investing>

- ☐ Selected stakeholders only
☐ On request only

IFD 25.2	Additional information.
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We have a website that explains our mission and investment objectives publicly; <http://www.actiam.nl/en/product-services/impact-investing>. In addition, for each Fund we formulate more detailed investment objectives in an Investment Memorandum.

IFD 26	Mandatory	Core Assessed	PIIF 5
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Possible action:

Fully disclose policies, criteria and related conditions of products and services to investees and other relevant stakeholders.

IFD 26.1

Other than the PRI/PIIF, indicate if you provide your investors and/or the public with information aligned with industry standards.

☒ Yes

IFD 26.2

Do you provide information aligned with:

☒ The MIV Disclosure Guidelines

☒ Yes, to our investors only

☐ Yes, to the public

☒ The Impact Reporting & Investment Standards (IRIS)

☐ Yes, to our investors only

☒ Yes, to the public

☐ Other, specify

☐ No

IFD 26.3

Additional information. [Optional]

The following website highlights the 39 IRIS indicators that are included in our Non-Financial Scorecard:
<https://iris.thegiin.org/users/profile/actiam-impact-investing/>

IFD 27

Mandatory

Core Assessed

PIIF 5

Possible action:

Ensure that investees adequately disclose the pricing, terms and conditions of financial products and services offered, and that the pricing, terms and conditions are understood by clients.

IFD 27.1

Indicate if you encourage the retail institutions in which you invest to ensure that the following are transparent and fully explained to their clients (i.e. those seeking financial services from them) in a form they can understand.

Pricing

☒ Yes

IFD 27.2

Indicate how you ensure this for pricing and provide examples.

This topic is included in the due diligence (Non-Financial Scorecard) process and the loan agreement also includes a specific clause on transparency: "MFIs should: in order to provide full transparency (a) adopt policies and procedures to disclose to its clients the total cost of (including all fees, commissions, insurance premiums and other costs) and b) report this information to MFTransparency, if requested by the Lenders."

☐ No

	Other terms and conditions
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☒ Yes

IFD 27.3	Indicate how you ensure this for other terms/conditions and provide examples.
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This topic is included in the due diligence (Non-Financial Scorecard) process and the loan agreement also includes a specific clause on transparency: "MFIs should: i. in order to provide full transparency (a) adopt policies and procedures to disclose to its clients the total cost of (including all fees, commissions, insurance premiums and other costs) and b) report this information to MFTransparency, if requested by the Lenders."

☐ No

PIIF Principle 6: Balanced returns

IFD 28	Mandatory	Core Assessed	PIIF 6
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Possible action:

Strive for a balanced long-term social and financial risk-adjusted return that recognises the interests of clients, retail providers and investors.

IFD 28.1	Indicate if the social performance of investees affects your:
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	Investment decision making
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☒ Yes

IFD 28.2	Explain how social performance of investees affects investment decision making.
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The social performance of MFIs is assessed in the due diligence process through the Non-Financial Scorecard. This assessment is an integrated part of the approval process. A negative social performance can result in the decision to disapprove an investment proposal.

☐ No

	Portfolio management
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☒ Yes

IFD 28.3	Explain how social performance of investees affects portfolio management.
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All portfolio MFIs are monitored on continuous basis. This monitoring process includes both the financial and the social performance of the MFIs. In addition, the Non-Financial Scorecard is monitored on annual basis. If a negative social performance is uncovered at one of the portfolio MFIs, this MFI will be engaged and requested to take measures to improve its performance. If no improvement is made this will influence the decision to refinance this MFI.

☐ No

IFD 29	Voluntary	Additional Assessed	PIIF 6
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Possible action:

Strive for a balanced long-term social and financial risk-adjusted return that recognises the interests of clients, retail providers and investors.

IFD 29.1	Indicate if your staff have monetary (or other – specify) incentives linked to social performance measures.
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☒ Yes

☐ No

IFD 29.2	Additional information.
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The key performance indicators (KPI's), which are used to assess and reward the performance of employees at ACTIAM are a combination of financial and non-financial criteria.

IFD 30	Voluntary	Additional Assessed	PIIF 6
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Possible action:

Strive for a balanced long-term social and financial risk-adjusted return that recognises the interests of clients, retail providers and investors.

IFD 30.1	Indicate if you collect data regarding the social outcomes of your investees' work.
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☒ Yes

☐ No

IFD 30.2	Additional information.
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We collect social data from our MFIs through the Non-Financial Scorecard. In addition, if our portfolio MFIs conduct additional research activities regarding the social outcomes of their work we request insight in this data (f.e. extensive PPI dataset by Grameen Koota).

We try to contribute to the development of the impact industry and therefore we contribute to several research projects and publications related to (the impact of) microfinance. For example, we cooperated with Maastricht University to get a better understanding of the interest rates charged by our portfolio MFIs.

IFD 31	Voluntary	Additional Assessed	PIIF 6
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Possible action:

Strive for a balanced long-term social and financial risk-adjusted return that recognises the interests of clients, retail providers and investors.

IFD 31.1	Indicate if you incentivise investees to track social performance.
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☒ Yes

IFD 31.2

Explain how you incentivise investees to track social performance.

We encourage MFIs to track social data (based on MIX Market social performance indicators) in order to get to know their clients. We stimulate data collection if the information can be used to improve processes and to develop new products based on clients' needs. MFIs are encouraged to implement appropriate MIS systems that enable the collection of social performance indicators together with financial indicators.

☐ No

PIIF Principle 7: Standards**IFD 32****Mandatory****Core Assessed****PIIF 7****Possible action:**

Participate in networks to share tools, information and resources.

IFD 32.1

Select which of the following collaborative initiatives your organisation has supported or participated in, and the role you played.

The Principles for Investors in Inclusive Finance

- ☒ Yes
- ☐ Basic
 - ☐ Moderate
 - ☒ Advanced
- ☐ No

The Smart Campaign

- ☒ Yes
- ☒ Basic
 - ☐ Moderate
 - ☐ Advanced
- ☐ No

Social Performance Task Force

- ☒ Yes
- ☐ Basic
 - ☒ Moderate
 - ☐ Advanced
- ☐ No

	Financial Inclusion Equity Council (formerly CMEF)
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- ☐ Yes
☒ No

	European Microfinance Platform (eMFP)
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- ☐ Yes
☒ No

	Global Impact Investors Network (GIIN)
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- ☒ Yes
 ☐ Basic
 ☐ Moderate
 ☒ Advanced
☐ No

	Other network, association memberships and/or specific collaboration related to the promotion of inclusive finance, specify
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NPM

- ☒ Yes
 ☒ Basic
 ☐ Moderate
 ☐ Advanced
☐ No

IFD 32.2	If you have indicated that your organisation was involved in any of the above, please provide a brief commentary. [Optional]
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Regarding the PIIF, one of the managing directors of ACTIAM Impact Investing has been a member of the Steering Committee. In addition, we are a member of the GIIN Investors' Council, and one of the ACTIAM II managing directors is also European Liaison of the GIIN. Furthermore, one of the managing directors chaired the committee which was established by the Dutch Platform for Inclusive Finance (NpM) on tax avoidance and was the author of the resulting report.

IFD 33	Voluntary	Additional Assessed	PIIF 7
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Possible action:

Participate in networks to share tools, information and resources.

IFD 33.1	Indicate if you encourage your investees to be a member of/endorse the following:
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	Social Performance Task Force
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- ☐ Yes
☒ No

	The Smart Campaign
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- ☒ Yes

	Describe how you have supported them in implementation (direct or via a third party) during the reporting year.
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Through our investment contracts and our investment manager Developing World Markets (DWM).

	Indicate what percentage of investees, as a percentage of your direct inclusive finance portfolio, is a member of/has endorsed this.
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- ☐ <20%
☐ 20-40%
☐ 41-60%
☐ 61-80%
☒ >80%
☐ We do not track this information
☐ No

	Other network and association memberships and/or specific collaboration related to the promotion of inclusive finance. (specify)
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- ☒ Yes

	Describe how you have supported them in implementation (direct or via a third party) during the reporting year.
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Through our investment contracts and our investment manager DWM.

	Indicate what percentage of investees, as a percentage of your direct inclusive finance portfolio, is a member of/has endorsed this.
--	--

- ☐ <20%
☐ 20-40%
☐ 41-60%
☐ 61-80%
☐ >80%
☒ We do not track this information
☐ No

IFD 34	Voluntary	Additional Assessed	PIIF 7
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Possible action:

Contribute to advancing benchmarking, as an incentive for improvement.

IFD 34.1	Indicate if you encourage your investees to participate in initiatives which contribute to the development of industry benchmarks.
	MIX Market
<input checked="" type="radio"/> Yes	
	Describe which actions you have taken and confirm if you encourage reporting against the MIX Social Performance Indicators.
Part of the investment contracts.	
<input type="radio"/> No	
	MFTransparency
<input checked="" type="radio"/> Yes	
	Describe what actions you have taken.
Part of the investment contracts.	
<input type="radio"/> No	
	Universal Standards for Social Performance Management
<input checked="" type="radio"/> Yes	
	Describe what actions you have taken.
Part of the investment contracts.	
<input type="radio"/> No	
	Other, specify
<input type="radio"/> Yes	
<input type="radio"/> No	