

## British Columbia Investment Management Corporation

## 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	🔒	n/a							✓
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	🔒	n/a							✓
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)	🔒	n/a				✓			
SAM 08	Monitoring processes (listed assets)	🔒	n/a	✓						
SAM 09	Percentage of (proxy) votes cast	🔒	n/a		✓					
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	🔒	n/a	✓					✓	
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	-	n/a	✓						
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	⚡	n/a		✓					
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	🔒	n/a	✓						
FI 07	Processes to ensure screening is based on robust analysis	🔒	n/a	✓						
FI 08	Processes to ensure fund criteria are not breached	🔒	n/a	✓						
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	🔒	n/a	✓						
FI 15	How ESG incorporation has influenced portfolio composition	-	n/a	✓						
FI 16	Incorporation of ESG issues has improved financial/ESG performance and reduced risk	-	n/a	✓						
FI 17	Examples of ESG issues that affected your investment view / performance	-	n/a	✓						
FI 18	Disclosure of approach to ESG incorporation	✓	Public		✓				✓	
FI 19	Engagement with corporate issuers	-	n/a		✓					
FI 20	Engagement with government issuers	-	n/a		✓					



Direct – Private Equity				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
PE 01	Breakdown of investments by strategy	✓	Public							✓
PE 02	Typical level of ownership	✓	Public							✓
PE 03	Description of approach to RI	✓	Public	✓					✓	
PE 04	Investment guidelines and RI	✓	Public		✓					
PE 05	Fund placement documents and RI	✓	Public	✓			✓		✓	
PE 06	Formal commitments to RI	✓	Public				✓			
PE 07	Incorporating ESG issues when selecting investments	✓	Public	✓						
PE 08	ESG advice and research when selecting investments	✓	Public	✓						
PE 09	ESG issues in investment selection process	✓	Public	✓		✓				
PE 10	Types of ESG information considered in investment selection	✓	Public	✓		✓				
PE 11	Encouraging improvements in investees	✓	Public	✓	✓					
PE 12	ESG issues impact in selection process	✓	Public	✓						
PE 13	Proportion of companies monitored on their ESG performance	✓	Public		✓					
PE 14	Proportion of portfolio companies with sustainability policy	✓	Public		✓					
PE 15	Actions taken by portfolio companies to incorporate ESG issues into operations	✓	Public		✓					
PE 16	Type and frequency of reports received from portfolio companies	✓	Public		✓	✓				
PE 17	Disclosure of ESG issues in pre-exit	✓	Public		✓					
PE 18	ESG issues affected financial/ESG performance	✓	Public	✓	✓					
PE 19	Examples of ESG issues that affected your PE investments	✓	Public	✓		✓				
PE 20	Disclosure of ESG information to public and clients/beneficiaries	✓	Public						✓	
PE 21	Approach to disclosing ESG incidents	✓	Public						✓	

Direct - Property				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
PR 01	Breakdown of investments by equity and debt	✓	Public							✓
PR 02	Breakdown of assets by management	✓	Public							✓
PR 03	Largest property types	✓	Public							✓
PR 04	Description of approach to RI	✓	Private	✓					✓	
PR 05	Responsible Property Investment (RPI) policy	✓	Public	✓					✓	
PR 06	Fund placement documents and RI	✓	Public	✓			✓		✓	
PR 07	Formal commitments to RI	✓	Public				✓			
PR 08	Incorporating ESG issues when selecting investments	✓	Public	✓						
PR 09	ESG advice and research when selecting investments	✓	Public	✓			✓			
PR 10	Examples of ESG issues in investment selection process	✓	Public	✓		✓				
PR 11	Types of ESG information considered in investment selection	✓	Public	✓		✓				
PR 12	ESG issues impact in selection process	✓	Public	✓						
PR 13	ESG issues in selection, appointment and monitoring of third-party property managers	✓	Public				✓			
PR 14	ESG issues in post-investment activities	✓	Public		✓					
PR 15	Proportion of assets with ESG targets that were set and monitored	✓	Public		✓	✓				
PR 16	Certification schemes, ratings and benchmarks	✓	Private		✓					
PR 17	Proportion of developments and refurbishments where ESG issues were considered	✓	Public		✓					
PR 18	Proportion of property occupiers that were engaged with	✓	Public		✓					
PR 19	Proportion of green leases or MOUs referencing ESG issues	✓	Public		✓					
PR 20	Proportion of assets engaged with on community issues	✓	Public		✓					
PR 21	ESG issues affected financial/ESG performance	✓	Public	✓	✓					
PR 22	Examples of ESG issues that affected your property investments	✓	Public	✓		✓				
PR 23	Disclosure of ESG information to public and clients/beneficiaries	✓	Public						✓	

Direct - Infrastructure				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
INF 01	Breakdown of investments by equity and debt	✓	Public							✓
INF 02	Breakdown of assets by management	✓	Public							✓
INF 03	Largest infrastructure	✓	Public							✓
INF 04	Description of approach to RI	✓	Public	✓					✓	
INF 05	Responsible investment policy for infrastructure	✓	Public	✓					✓	
INF 06	Fund placement documents and RI	✓	Public	✓			✓		✓	
INF 07	Formal commitments to RI	✓	Public				✓			
INF 08	Incorporating ESG issues when selecting investments	✓	Public	✓						
INF 09	ESG advice and research when selecting investments	✓	Public	✓			✓			
INF 10	Examples of ESG issues in investment selection process	✓	Public	✓		✓				
INF 11	Types of ESG information considered in investment selection	✓	Public	✓		✓				
INF 12	ESG issues impact in selection process	✓	Public	✓						
INF 13	ESG issues in selection, appointment and monitoring of third-party operators	⚠	n/a				✓			
INF 14	ESG issues in post-investment activities	✓	Public		✓					
INF 15	Proportion of assets with ESG performance targets	✓	Public		✓					
INF 16	Proportion of portfolio companies with ESG/sustainability policy	✓	Public		✓					
INF 17	Type and frequency of reports received from investees	✓	Public		✓	✓				
INF 18	Proportion of maintenance projects where ESG issues were considered	✓	Public		✓					
INF 19	Proportion of stakeholders that were engaged with on ESG issues	✓	Public		✓					
INF 20	ESG issues affected financial/ESG performance	✓	Public	✓	✓					
INF 21	Examples of ESG issues that affected your infrastructure investments	-	n/a	✓		✓				
INF 22	Disclosure of ESG information to public and clients/beneficiaries	✓	Public						✓	
INF 23	Approach to disclosing ESG incidents	✓	Public						✓	

# British Columbia Investment Management Corporation

## 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
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☐ <10%

☐ 10-50%

☒ >50%

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

☐ 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.
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Canada

OO 02.2	Indicate the number of countries in which you have offices (including your headquarters).
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☐ 1

☒ 2-5

☐ 6-10

☐ >10

OO 02.3	Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).
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	FTE
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OO 03	Mandatory	Descriptive	General
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OO 03.1	Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.
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☐ Yes

☒ No

OO 04	Mandatory	Gateway/Peering	General
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**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		115	320	913	421
Currency	CAD				
Assets in USD		105	556	783	668

**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 04.6** Additional information. [Optional]

Net assets are reported as at December 31st, 2014, except for illiquid assets (Real Estate, Private Equity and Infrastructure) which are audited figures at the end of December 2013. Audited figures for these asset classes will only be available at the end of July 2015 after the close of the PRI reporting period. Unaudited figures as at February 2015 give us confidence that none of the percentage ranges of total asset under management associated with each of the asset classes will be affected.

**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%	0
Fixed income – government	10-50%	0
Fixed income – other	<10%	0
Private debt	0	0
Private equity	<10%	<10%

Property	10-50%	0
Infrastructure	<10%	<10%
Commodities	0	0
Hedge funds	0	0
Forestry	0	0
Farmland	0	<10%
Inclusive finance	0	0
Cash	<10%	0
Other (1), specify	<10%	0
Other (2), specify	0	0

'Other (1)' specified

#### Currency Hedging & Other Strategies

☐ 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 checked="" type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50 %
Pooled fund(s)	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50 %
<i>Total externally managed assets</i>	100%

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.
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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 checked="" type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50 %

OO 09	Voluntary	Descriptive	General
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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.
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bclMC invests for the long-term, compelling us to consider environmental, social, and governance factors that may present risks and opportunities over the duration of our investments. Responsible investing is one of bclMC's investment beliefs - we believe that companies that do a good job of managing environmental, social and governance matters have less risk and perform better financially over the longer term. bclMC's commitment to responsible investing is reflected in our vision and mission statements, as well as the corporate tag line.

## Gateway asset class implementation indicators

OO 10	Mandatory	Gateway	General
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OO 10.1	Select the responsible investment activities your organisation implemented, directly and/or indirectly, for listed equities in the reporting year.
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- ☒ 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.

- ☒ Fixed income – corporate
- ☒ Fixed income – government
- ☐ Fixed Income – other
- ☒ Private equity
- ☒ Property
- ☒ Infrastructure
- ☐ Cash
- ☐ Other (1)
- ☐ None of the above

'Other (1)' [as defined in OO 05]

### Currency Hedging & Other Strategies

**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.

- ☒ Private equity
- ☒ Infrastructure
- ☐ Farmland
- ☐ None of the above

**OO 12****Mandatory****Gateway****General****OO 12.1**

The modules and sections that you will be required to complete are listed below.

*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

- ☒ 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

- ☒ Private Equity
- ☒ Property
- ☒ Infrastructure

### **RI implementation via external managers**

#### Indirect - Selection, Appointment and Monitoring of External Managers

- ☒ Listed Equities
- ☒ Private Equity
- ☒ Infrastructure

### **Closing module**

- ☒ Closing module

# British Columbia Investment Management Corporation

## Reported Information

### Public version

### 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.

- ☒ Yes  
☐ No

**OA 01.2** Indicate if you have other guidance documents or more specific policies related to responsible investment.

- ☒ 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]

Our framework is supported by our own principles as they relate to responsible investing and our principles help guide ESG strategies across our portfolio. The following principles guide our responsible investing approach:

- Our primary concern is for the long-term value of bclMC's investments; environmental, social and governance matters are addressed to the extent that they influence risk and return.
- As significant ESG risks and opportunities vary between asset classes, regions, industries and companies, we adapt our approach and strategy to what is appropriate for the investment.
- Knowledge and reason, while looking out for our clients' return expectations, inform our responsible investing decisions and activities.
- We do not seek to place unnecessary burdens on companies that we own, and recognize that the introduction of good practices and meaningful, large-scale change, takes time.
- We have a responsibility to converse with companies and market participants (such as regulators, stock exchanges, etc) about their policies and activities - we believe that engaging is more effective in seeking to initiate change than divesting, and that aligning with like-minded investors and organizations is more effective than working in isolation.
- As a significant investor, we have a responsibility to advance responsible investing within the investment industry.
- As responsible investing continues to evolve, the integration and implementation of our responsible investing approach is constantly under development: we shall continuously learn from our own practices and experience.

Responsible investing is part of our investment style; our approach is based on three core activities:

1. Integrating responsible investing into our investment analysis and decision-making processes
2. Being an active owner - we use our influence as a shareholder to encourage companies to manage and report on their risks and opportunities, and in so doing encourage companies to enhance governance practices. As many of bclMC's investments will be held for more than 20 or 30 years, we expect the companies we own to focus on the long-term and to pursue activities and practices that will improve their value and produce reliable cash flows.
3. Being an active participant in the capital markets - bclMC relies on well-functioning capital markets. As a large-scale global investor, we see it as our responsibility to contribute to the overall stability of the financial system. We address systemic risks, with the expectation that our efforts will lead to greater stability and integrity within the markets.

Our focus is driven by the management of investment risks and we pursue activities that are expected to have the greatest impact. In view of what are by definition limited resources, bcIMC chooses to be selective, specific and pragmatic at all times.

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.
---------	--

	URL
--	-----

<http://www.bcimc.com/ResponsibleInvesting/Approach.asp>

☐ 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
Shareholder Engagement Guidelines	<a href="http://www.bcimc.com/publications/pdf/ResponsibleInvesting/ShareholderEngagementGuidelines.pdf">http://www.bcimc.com/publications/pdf/ResponsibleInvesting/ShareholderEngagementGuidelines.pdf</a>
Proxy Voting Guidelines	<a href="http://www.bcimc.com/publications/pdf/ResponsibleInvesting/CorporateGovernancePrinciplesProxyVotingGuidelines.pdf">http://www.bcimc.com/publications/pdf/ResponsibleInvesting/CorporateGovernancePrinciplesProxyVotingGuidelines.pdf</a>
Factsheets (RI & Shareholder Engagement)	<a href="http://www.bcimc.com/publications/default.asp#factsheets">http://www.bcimc.com/publications/default.asp#factsheets</a>
Responsible Investing Annual Report	<a href="http://www.bcimc.com/ResponsibleInvesting/Reporting.asp">http://www.bcimc.com/ResponsibleInvesting/Reporting.asp</a>
Responsible Investing Newsletters	<a href="http://www.bcimc.com/ResponsibleInvesting/Reporting.asp">http://www.bcimc.com/ResponsibleInvesting/Reporting.asp</a>
Strategic Business Plan	<a href="https://www.bcimc.com/publications/pdf/bclMC_SBP2014.pdf">https://www.bcimc.com/publications/pdf/bclMC_SBP2014.pdf</a>

☐ No

#### OA 02.5

Additional information. [Optional]

bcIMC's corporate annual reports have included a dedicated section on responsible investing since 2004-2005. In 2015, bcIMC issued for the first time a Responsible Investing Annual Report that provides an overview of bcIMC's responsible investing initiatives for the 2014 calendar year.

#### OA 03

Mandatory

Core Assessed

PRI 1,2

#### 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 type="checkbox"/> Other, specify <input type="checkbox"/> Other, specify	<input type="radio"/> Applicable policies cover all AUM <input checked="" type="radio"/> Applicable policies cover a majority of AUM <input type="radio"/> Applicable policies cover a minority of AUM

OA 03.2

Comment on any variations or exceptions in the coverage of your responsible investment policy. [Optional]

bcIMC has taken an approach that provides asset class specific policies taking into consideration the unique qualities of that asset. Distinct policies are in place for Equities, Real Estate, Private Equity/Infrastructure and Mortgages. The only exception might be sovereign fixed income that does not have a specific ESG policy.

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]

Conflicts of interest in the investment process are not likely to occur. Our clients do not decide on individual investments; they establish investment policy, asset allocation and determine participation in particular pooled funds though not the underlying investments. Individual members of our client boards do not have any authority to direct bcIMC in investment decisions. Clients establish investment policies that clearly address the roles and responsibilities of all parties involved with their respective fund/plan.

bcIMC is responsible for ensuring client funds are managed in accordance with the investment policy. All employees are bound by the Corporate Code of Conduct and must certify compliance annually. bcIMC is required by its clients to have a comprehensive and thorough conflict of interest policy that meets or exceeds the standards established for the investment industry by the CFA Institute and is required to disclose any material breach by employees or its agents. bcIMC also has a Code of Conduct for Directors and board members do not have any authority, individually or as a board, to direct investments.

☐ No

## Objectives and strategies

OA 05

Mandatory

Gateway/Core Assessed

General

<b>OA 05.1</b>	Indicate if your organisation sets objectives for its responsible investment activities.
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- ☐ Yes  
☒ No

<b>OA 05.4</b>	Additional information. [Optional]
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We are in the process of developing Key Performance Indicators regarding RI, starting with listed equities, and we are using the results of this survey to help us guide that process.

## Governance and human resources

<b>OA 07</b>	<b>Voluntary</b>	<b>Descriptive</b>	<b>General</b>
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<b>OA 07.1</b>	Provide a brief description of your organisation's governance, management structures and processes related to responsible investment.
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As part of the prudent investment management of our clients' funds, we aim to actively manage the long-term risks and opportunities that ESG matters present, both now and into the future. This begins with the integration of ESG factors into our investment analysis, decisions and processes. As an owner, we monitor ESG factors and have a strong commitment to engagement as a way of raising awareness that long-term returns depend on well-functioning and well governed companies - we use our influence as a shareholder to encourage companies to manage and report on their ESG risks.

In addition, bclMC has a group (three full time staff) within the public equities department focusing on ESG matters, engagement, proxy voting, and regulatory submissions. bclMC's in-house research team integrates ESG matters into the fundamental analysis of Canadian companies - the analysis is included in their research reports for use by equities and fixed income.

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

<b>OA 08</b>	<b>Mandatory</b>	<b>Gateway/Core Assessed</b>	<b>General</b>
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<b>OA 08.1</b>	Indicate the roles present in your organisation and for each, indicate whether they have oversight and/or implementation responsibilities for responsible investment.
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	Roles present in your organisation
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- ☒ Board members or trustees
  - ☒ Oversight/accountability for responsible investment
  - ☐ Implementation of responsible investment
  - ☐ No oversight/accountability or implementation responsibility for responsible investment
- ☒ 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  
All asset class SVPs.



- ☒ 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
- ☐ Other role, specify
- ☐ Other role, specify

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

	Number
--	--------

3

<b>OA 08.3</b>	Additional information. [Optional]
----------------	------------------------------------

The implementation of RI at the Portfolio Manager (PM) level would mostly apply to PMs managing active portfolios.

While we have 3 Public Equities FTEs part of the Shareholder Engagement group (one Manager, one Equity Analyst, and one Associate) whose entire responsibilities would be dedicated to RI activities, bcIMC's approach is to integrate RI into the investment management process, thus making it a responsibility of each investment professional.

<b>OA 09</b>	<b>Voluntary</b>	<b>Additional Assessed</b>	<b>General</b>
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<b>OA 09.1</b>	Indicate if your organisation's performance management, reward and/or personal development processes have a responsible investment element.
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#### Board members/Board of trustees

- ☒ Responsible investment included in personal development and/or training plan

All incoming Board members have an orientation session that includes RI briefings. Other Board members are invited to attend to refresh their knowledge as well.

☐ None of the above

#### **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**

All asset class SVPs.

- ☐ 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

OA 09.3

Provide any additional information on your organisation's performance management, reward and/or personal development processes in relation to responsible investment.

Portfolio Managers most concerned are the ones managing the active portfolios.

## 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]

bclMC is an active PRI signatory, and we list our involvement below.

#### Policy and Research Steering Committee (on behalf of British Columbia Municipal Pension Plan (MPP))

bclMC chairs this committee with a mandate to mitigate barriers to a sustainable financial system within the capital markets. The group, which provides guidance to the Secretariat, is overseeing two projects focusing on long-term investing: 1) Identifying and addressing barriers to long-term mandates; 2) Providing guidance to investors about engaging with policymakers.

#### Private Equity Steering Committee

bclMC sits on this steering committee and helped develop PRI's Integrating ESG in private equity - a guide for general partners. The document provides general partners strategies and tools for integrating ESG factors into investment processes.

#### Hydraulic Fracturing Collaborative Initiative (on behalf of MPP)

bclMC served as a steering committee member and a lead investor responsible for engaging four Canadian companies. We are encouraging them to implement best practices such as enhanced disclosure of policies, limit the use of fresh water, and invest in energy-efficient technologies.

#### Labour Standards in the Agricultural Supply Chain Collaborative Initiative

bclMC serves as a steering committee member and engages companies to identify and assess risks relating to working conditions. The issues include child labour, health & safety, debt bondage and trafficking, wages, working conditions, and freedom of association.

#### Human Rights in Extractive Sector Collaborative Initiative

As a steering committee member, bclMC assisted with laying the groundwork for the collaborative engagement, which is set start in 2015. The aim is to enhance disclosure of human rights policies and practices. We will seek to improve the implementation of the UN Guiding Principles on Business and Human Rights by oil & gas and mining companies.

#### Sustainable Stock Exchanges Collaborative Initiative

As a member of this PRI working group, we encourage stock exchanges around the world to enhance listing rules and advance regulatory initiatives. The aim is to require companies to disclose their sustainability strategies. This will allow investors to access standardized data they require to integrate ESG factors into their investment analysis and decision making.

### **Sustainable Palm Oil Targeting Growers Collaborative Initiative**

bclMC is a supporting investor of this collaborative initiative. The palm oil industry has been linked to environmental and social impacts including increased greenhouse gas emissions, damage to ecosystem services and social conflicts. bclMC, along with our peers, aims to enhance companies' disclosure and certification of Roundtable on Sustainable Palm Oil (RSPO).

### **PRI-related Consultations**

We also actively submit comments to PRI consultations including the Governance Review, the Pilot Assessment Methodology and Assessment Report and the PRI Strategic Plan and Funding Model.

### **PRI Events**

5 bclMC employees attended the PRI In Person conference in Montreal, and spoke on two panels on the topics of hydraulic fracturing and public policy. bclMC was a supporter sponsor of the PRI in Person conference and also sponsored the session on Executive Compensation.

We sponsored a PRI event and panel in Western Canada with Fiona Reynolds in February 2014.

☒ 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]
--

We participate in regular conference calls with staff and other investor members to stay informed on governance developments in the region and to share our experience and issues of concerns; we support the association regulatory efforts by providing comments on public policy submissions and by endorsing ACGA's submissions to regulators as part of our own submissions; and took part in a collaborative initiative calling on South Korean companies to provide audited financial statements ahead of companies' annual general meetings.

- ☐ 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]

bcIMC sits on the CDP Canada Advisory Council and provides financial support for the Canadian report published each fall. We also spoke on a panel at a CDP workshop on the importance of CDP data for investors.

☐ CDP Forests

☒ 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]

We are an investor signatory.

☐ CFA Institute Centre for Financial Market Integrity

☐ Council of Institutional Investors (CII)

☐ Eumedion

☒ 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]

bcIMC is an investor member of EITI. Participation is limited to conference calls with the investor representative and promotion of EITI to portfolio companies.

☐ Global Investors Governance Network (GIGN)

☐ Global Real Estate Sustainability Benchmark (GRESB)

☐ Institutional Investors Group on Climate Change (IIGCC)

☐ Interfaith Center on Corporate Responsibility (ICCR)

☒ International Corporate Governance Network (ICGN)

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]

We spoke on managing ESG responsibilities and fiduciary duty at ICGN 2014 ESG training programme in Montreal.

- ☐ Investor Group on Climate Change, Australia/New Zealand (IGCC)
- ☒ Investor Network on Climate Risk (INCR)/CERES

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]

We are part of the Sustainable Stock Exchanges working group.  
We signed the 2014 Global Investor Statement on Climate Change.

- ☐ Local Authority Pension Fund Forum
- ☒ Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify  
Responsible Investment Association - Canada

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]

We are institutional members.

- ☒ Shareholder Association for Research and Education (Share)

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]

We spoke at SHARE's pension forum in 2014.

- ☐ 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]

Limited to promoting with portfolio companies.

- ☒ Other collaborative organisation/initiative, specify  
Canadian Coalition for Good Governance (CCGG)

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]

bciMC sits on the board of the CCGG and directly participates in company and regulatory/policy engagements with our CCGG peers.

- ☒ Other collaborative organisation/initiative, specify  
Pension Investment Association of Canada (PIAC)

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]

We are a corporate member of PIAC, a member of the organization's corporate governance committee, and spoke at their annual conference on how bclMC approaches responsible investing and illustrated more specific activities to address climate change issues.

- ☐ Other collaborative organisation/initiative, specify
- ☐ Other collaborative organisation/initiative, specify

OA 11	Mandatory	Core Assessed	PRI 4
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**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

☐ No

**OA 11.3** Additional information. [Optional]

We promoted the PRI case study document on the Implementation of the PRI by small and resource constrained investors to a group of PIAC (Pension Investment Association of Canada) members out of which most are small funds.

We also spoke on RI at a Professional Development Day organized by the BC Pension Corporation for their employees which are beneficiaries of the pension funds we managed.

OA 12	Voluntary	Additional Assessed	PRI 4,5,6
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**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.bcimc.com/Newsroom/submissionscomments.asp>

☐ No

☐ No

**OA 12.4** Additional information.

bcIMC made a number of submissions in 2014 including: PRI Governance Review, PRI Assessment Consultation, PRI Strategic Plan and Funding Model consultation, Industry Canada consultation on the Canada Business Corporations Act, CSR Strategy Review Canada, CSA Proposed National Policy 25-201 on Disclosure of Corporate Governance Practices Regarding Women on Boards and in Senior Management, IOSCO letter on ESG Disclosure, Proxy Voting Roundtable Consultation with the BC Securities Commission, Hong Kong Exchanges and Clearing Ltd. (HKE) Concept Paper on Weighted Voting Rights, the ACGA Investor Survey on Proxy Voting in Asia, ISS 2015 Benchmark Policy, the OECD Principles of Corporate Governance. In addition, we signed the 2014 Global Investor Statement on Climate Change and co-signed a letter to the UN Secretary-General calling for incentives to invest in climate-resilient infrastructure assets.

**ESG issues in asset allocation**

OA 13	Voluntary	Descriptive	PRI 1
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**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
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**OA 14.1** Indicate if your organisation allocates assets to, or manages, funds based on specific environmental and social themed areas.

☒ Yes

**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  
☐ Private equity  
☐ Property  
☐ Infrastructure

**Brief description of investment**

Thematic fund launched in 2013 includes investments in solar power and other alternative energy themes.

- ☒ Green buildings

**Asset class invested**

- ☐ Listed equity  
☐ Fixed income - corporate  
☐ Fixed income - government  
☐ Private equity  
☒ Property  
☐ Infrastructure

**Brief description of investment**

About 75% of our real estate portfolio is certified to LEED, BOMA Best or Hotel Association of Canada Green Key Program.

- ☐ Sustainable forestry  
☒ Sustainable agriculture

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

- ☐ Listed equity
- ☐ Fixed income - corporate
- ☐ Fixed income - government
- ☐ Private equity
- ☒ Property
- ☐ Infrastructure

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

Contributing to TIAA-CREF portfolio of farmland investments.

- ☐ Microfinance
- ☐ SME financing
- ☐ Social enterprise / community investing
- ☐ Affordable housing
- ☐ Education
- ☒ Global health

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

- ☒ Listed equity
- ☐ Fixed income - corporate
- ☐ Fixed income - government
- ☐ Private equity
- ☐ Property
- ☐ Infrastructure

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

One of our thematic focus areas launched in 2013.

- ☒ Water

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

- ☒ Listed equity
- ☐ Fixed income - corporate
- ☐ Fixed income - government
- ☐ Private equity
- ☐ Property
- ☐ Infrastructure

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

Thematic fund includes investments in water theme.

☐ Other area, specify

☐ No

## Innovation

OA 18	Voluntary	Descriptive	General
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OA 18.1	Indicate whether any specific features of your approach to responsible investment are particularly innovative.
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☐ Yes

☒ 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.
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☒ 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.

Each asset class was responsible for their portion of the assessment and therefore, each asset class SVP has reviewed their portion and provided sign-off. This has been more of a senior management review process rather than internal auditing function.

☐ No

# British Columbia Investment Management Corporation

## 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

<b>SAM 01</b>	<b>Voluntary</b>	<b>Descriptive</b>	<b>PRI 1-6</b>
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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.

Listed Equities: Our focus is mainly on the selection process of external managers for listed equities mandates. ESG criteria are now included in the Request for Proposal (RFP) process.

Private Equity & Infrastructure: Our focus is mainly on the selection process of external managers. ESG criteria are now included in manager evaluation.

<b>SAM 02</b>	<b>Mandatory</b>	<b>Core Assessed</b>	<b>PRI 4</b>
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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

<b>SAM 03</b>	<b>Mandatory</b>	<b>Gateway</b>	<b>General</b>
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**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 type="checkbox"/>	<input type="checkbox"/>
Private equity	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Infrastructure	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**SAM 03.2** Additional information. [Optional]

Listed Equities: In our requests for proposals (RFPs) for external managers for listed equities, one of the questions is 'Are ESG factors used in your investment process?'. A small Asian corporate governance-focused listed equity mandate was awarded. But as this governance mandate is quite marginal, we are not reporting on the appointment and monitoring sections.

**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 checked="" type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
Active - quantitative (quant)	<input type="radio"/> 0% <input type="radio"/> <10% <input checked="" type="radio"/> 10-50% <input type="radio"/> >50%
Active - fundamental and other active	<input type="radio"/> 0% <input type="radio"/> <10% <input checked="" type="radio"/> 10-50% <input type="radio"/> >50%

### SAM 05

#### Mandatory

#### Gateway

#### PRI 1,2

### SAM 05.1

Indicate which of the following ESG incorporation strategies you encourage or require your external manager(s) to implement on your behalf:

#### Active investment strategies

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

**SAM 05.2**

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

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

	<b>LE</b>	
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 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



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

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

We include in our RFPs a question regarding the integration of ESG factors.

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

### Selection

<b>SAM 10</b>	<b>Mandatory</b>	<b>Core Assessed</b>	<b>PRI 1-6</b>
<b>SAM 10.1</b>	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	INF
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 type="checkbox"/>
Assign specific weighting to ESG factors in your manager evaluation	<input checked="" 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	INF
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	INF
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
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<b>SAM 11.1</b>	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
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	PE	INF
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 checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>

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

#### Investment monitoring (post-investment) of underlying holding

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

#### Reporting

	PE		INF
Reporting on the agreed ESG implementation activities	<input type="checkbox"/>		<input type="checkbox"/>
Reporting on the ESG characteristics of the portfolio	<input type="checkbox"/>		<input type="checkbox"/>
Reporting on company incidents relating to ESG issues	<input type="checkbox"/>		<input 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 checked="" type="checkbox"/>		<input checked="" type="checkbox"/>

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

bcIMC reviews involvement in any problematic sectors such as cluster bombs and munitions manufacturing as well as involvement with countries subject to international sanctions.

bcIMC has an ESG policy for both Private Equity and Infrastructure which is provided to external managers; however, managers are not legally bound to the policies.

## 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	INF
Include responsible investment as a standard agenda item at performance review meetings	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Include responsible investment criteria as a formal component of overall manager performance evaluation	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input checked="" 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	INF
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	INF
Request reports on the ESG characteristics of the manager's underlying holdings and discuss related developments that may impact holdings in the fund	<input type="checkbox"/>	<input 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"/>

### 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.

%

70

**SAM 14.2** Additional information. [Optional]

The 70% applies to our externally managed listed equity assets.

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.

☒ Add Example 1

Topic or issue	Listed Equities: Low board independence - some Asian companies have high level family ownership translating into board representation
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"/> Private equity <input type="checkbox"/> Infrastructure
Scope and process	The first objective of the small governance mandate is to voice concerns with low level independence of some boards and investors' preference in seeing a majority independent board at the minimum. This is done by engaging directly with individual companies' management and board of directors.
Outcomes	In many Asian countries, market-wide and company-specific changes in corporate governance (CG) and board independence are slow to materialize. We are not reporting company-specific changes, but are viewing some changes positively in some countries and note that companies are more receptive to listening to investors' CG concerns.

☐ Add Example 2

☐ Add Example 3

☐ Add Example 4

☐ Add Example 5

## Communication

**SAM 16****Mandatory****Core Assessed****PRI 6****SAM 16.1**

Indicate if your organisation proactively discloses any information about responsible investment considerations in your indirect investments.

- ☐ Yes, we disclose information publicly  
☐ Yes, we disclose information to clients/beneficiaries only  
☒ We do not proactively disclose information to the public and/or clients/beneficiaries

# British Columbia Investment Management Corporation

## 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
--	---

- ☐ <10%  
☐ 10-50%  
☒ >50%

☐ Active – quantitative (quant)

☒ 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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Our Capital Markets Research team is incorporating an ESG score into its fundamental analysis and the ESG performance factors differ from sector to sector to ensure relevancy. These factors make up approximately 20% of the overall score assigned to covered issuers and directly feeds into our active internal Canadian strategy as well as our internally managed thematic portfolio. Our Global ESG fund utilizes the MSCI ESG Manager data to pick best in class companies. Our thematic fund also actively seeks to avoid poor ESG performers and analysts dedicated to thematic incorporate an ESG score similar to that mentioned above.

## 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)

Percentage of active listed equity to which the strategy is applied - you may (estimate +/- 10%)	<div> <div></div> <div>%</div> </div>
	80

☐ Thematic alone (i.e. not combined with any other strategies)

☐ Integration alone (i.e. not combined with any other strategies)

☒ Screening + Integration strategies

Percentage of active listed equity to which the strategy is applied - you may (estimate +/- 10%)	<div> <div></div> <div>%</div> </div>
	10

☐ 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>
	10

☐ No incorporation strategies applied

Total actively managed listed equities

100%

**LEI 03.2**

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

The strategy is guided by the particular mandate. Our Canadian active mandate relies on integration taking advantage of our buy side analyst team that factors in ESG risk. We have a new thematic mandate that does the same. Both these portfolios are actively managed. In terms of screening, which is applied to all our portfolios (active and passive), we established a policy on cluster bombs and landmines manufacturers primarily as legal implications for these investments evolved.

**LEI 03.3**

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

Our entire portfolio is screened for cluster bombs and landmines (i.e. this screening applies to all internally and externally managed equities owned by bclMC funds). Our Active Canadian fund uses research analysts who integrate ESG factors into their company analyses for its investment selection decisions. Our thematic fund centers around particular themes with ESG factors layered into the stock selection process. Finally, our Global ESG Fund operates under a best in class ESG mandate with additional screens related to tobacco, military involvement, nuclear energy and gambling. Thus, our funds principally use a combination of screening and integration ESG incorporation strategies.

**LEI 03.4**

Additional information. [Optional]

We want to qualify our response to indicator 3.1 as we have re-categorized our internally managed assets between active and passive and have eliminated the enhanced-index category which we are reporting this year as actively managed assets. Last year we reported 100% of our actively and internally managed assets incorporating ESG factors, while we are now reporting approximately 20% of our actively managed assets as using at least 2 ESG incorporation strategies.

We also want to point out that the exclusion of indexed-based portfolios implies that we are not reporting on any screens that we apply to indexed portfolios. We want to flag that, for example, applying ESG screens to index-based portfolios is one way RI strategies could be applied to a passive investing style and we think there should be a way investors could report on this even though it does not apply to actively managed portfolios. We apply screens for landmines and cluster munitions to all of our active and passive portfolios.

Furthermore, as part of our asset allocation strategy, we decided to offer index-based portfolios such as the MSCI's US Social Index and the Global ESG Fund Index. But based on the narrow scope of the question, those 2 portfolios which are clearly incorporating ESG considerations are not included in the reported figures, even though stocks have been picked by the index provider explicitly based on ESG criteria instead of via internal fundamental analysis. We consider this may lead to an under representation of the commitment we made at the asset allocation level to incorporate ESG factors in our offering even though it falls under the passive management strategy.

**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.

We utilize several sources of ESG information which includes Bloomberg, MSCI ESG Manager, and ISS. For global companies we see more sell-side research on ESG, but the Canadian sell side research has not evolved to include a great deal of ESG research yet.

<b>LEI 04.3</b>	Indicate if you incentivise brokers to provide ESG research.
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- ☐ Yes  
☒ No

<b>LEI 04.5</b>	Additional information.
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We have not incentivised brokers in 2014 (LEI 04.3), but we have in the past and continue to explore opportunities to do so.

<b>LEI 05</b>	<b>Voluntary</b>	<b>Additional Assessed</b>	<b>PRI 1</b>
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<b>LEI 05.1</b>	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.
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- ☒ 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.

<b>LEI 05.2</b>	Additional information. [Optional]
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bcIMC professionals with a mandate to engage with public equities are situated in the Equities Department along with portfolio managers. This allows for the exchange of information on engagement and voting in an informal manner and sometimes PMs will join an engagement as well.

## (A) Implementation: Screening

<b>LEI 06</b>	<b>Mandatory</b>	<b>Descriptive</b>	<b>PRI 1</b>
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<b>LEI 06.1</b>	Indicate and describe the type of screening you apply to your internally managed active listed equities.
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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
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We have negative screens in place for cluster bombs and landmines across all public equities.

- ☒ Positive/best-in-class screening

#### Screened by

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

	Description
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Our Global ESG Fund is a best in class selection process.

- ☐ Norms-based screening

#### 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.

In some cases we rely on external research providers and their criteria. For cluster bombs and landmines, as well as the Global ESG Fund, bcIMC's responsible investing professionals assisted in developing criteria after a thorough environmental scan of global practices in this area and in consultation with the PMs in charge of the Fund.

LEI 07	Mandatory	Core Assessed	PRI 1
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**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 08.3**

Additional information.

To clarify our response, the systematic checks to ensure stocks meet screening criteria are conducted specifically on the Global ESG Fund, wherein the PMs alert the ESG specialists to any changes in the index and these are confirmed by a review. All other funds are prevented from investing in excluded stocks via automated IT systems.

**(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

<b>LEI 09.2</b>	Describe your organisation's processes for sustainability themed funds. [Optional]
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bclMC began a thematic investing program in 2013. We have harnessed our own expertise and worked with a global management consulting firm to develop our program. Together we have created a collaborative process for assessing trends, identifying themes, selecting opportunities worthy of pursuit, as well as determining our desired exposure.

In 2014, we have built on the research team dedicated to our Thematic portfolios. Two analyst are responsible of macro analysis including identifying themes in addition to two fundamental analysts.

<b>LEI 09.3</b>	Additional information. [Optional]
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bclMC's Annual Report provides more insight on our thematic investing program which can be found at <http://www.bcimc.com/publications/Default.asp>.

### (C) Implementation: Integration of ESG issues

<b>LEI 10</b>	<b>Voluntary</b>	<b>Descriptive</b>	<b>PRI 1</b>
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<b>LEI 10.1</b>	Describe how you integrate ESG factors into investment decision making processes.
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Our capital markets research team incorporates ESG assessments into fundamental company evaluations, representing up to about 20% of the overall score, and provides this research to portfolio managers. These ESG assessments are sector-specific with a focused set of performance indicators that are deemed most material. Our dedicated shareholder engagement team provides more detailed company-specific and general ESG information to the research team and portfolio managers. To do this, a combination of external and internal research is accessed.

<b>LEI 11</b>	<b>Mandatory</b>	<b>Core Assessed</b>	<b>PRI 1</b>
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<b>LEI 11.1</b>	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 11.2** Additional information. [Optional]

Analysts must systematically review ESG issues as part of the fundamental research process as further described in other portions of this assessment.

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
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<b>LEI 13.1</b>	Indicate into which aspects of investment analysis you integrate ESG information.
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- ☐ (Macro) economic analysis
- ☒ Industry analysis
  - ☐ Systematically
  - ☒ Occasionally
- ☒ Analysis of company strategy and quality of management
  - ☒ Systematically
  - ☐ Occasionally
- ☒ Idea generation
  - ☐ Systematically
  - ☒ Occasionally
- ☐ Portfolio construction
- ☐ Fair value/fundamental analysis
- ☐ Other, specify

## ESG incorporation in passively managed listed equities

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

<b>LEI 14.2</b>	Indicate the percentage of your total passive listed equity funds for which ESG issues are incorporated in the index construction methodology.
-----------------	--

	(% of total passive listed equity funds)
--	--

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

<b>LEI 14.3</b>	Specify index/fund name, provide a brief description of ESG methodology and indicate which of the following ESG incorporation strategies you apply.
-----------------	---

☒ Index/fund 1

Index/fund name and brief description of ESG methodology	ESG incorporation strategy
Global ESG Fund which is based on MSCI research/ratings which identify best in class companies for each sector. bclMC has also factored in some exclusionary screens that are overlaid on to the MSCI list of companies.	<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

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.
----------	---

☒ Screening

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

For our Global ESG Fund, if the MSCI World Index is the starting universe, then we have reduced the universe by more than 50% as that index has over 1600 names.

☐ Thematic

☒ Integration of ESG issues

Select which of these effects followed your ESG integration:

☐ Reduce or prioritise the investment universe

☐ Overweight/underweight at sector level

☐ Overweight/underweight at stock level

☒ Buy/sell decisions

☐ Other, specify

☐ None of the above

☐ Index incorporating ESG issues (for passively managed funds)

LEI 16	Voluntary	Additional Assessed	PRI 1
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<b>LEI 16.1</b>	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
<b>Funds' financial performance</b>	<input type="radio"/> Positive <input type="radio"/> Negative <input checked="" type="radio"/> No impact	<input checked="" type="checkbox"/> Screening <input type="checkbox"/> Integration <input type="checkbox"/> Thematic <input 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

<b>LEI 16.2</b>	Describe how you are able to determine these outcomes.
-----------------	--

As we believe incorporating ESG considerations will add to long-term value, it is difficult to quantify performance and outcomes for a short-term horizon.

As screening only applies to cluster munitions and landmines, the increase in ESG performance is only marginal.

One evidence of outcome could be qualified by the performance of our Global ESG Fund which to date has performed line with its benchmark.

## Communication

<b>LEI 18</b>	<b>Mandatory</b>	<b>Core Assessed</b>	<b>PRI 2,6</b>
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<b>LEI 18.1</b>	Indicate if your organisation proactively discloses information on your approach to ESG incorporation in listed equity.
-----------------	---

- ☒ We disclose it publicly

Provide URL

<http://www.bcimc.com/ResponsibleInvesting/Reporting.asp>

<b>LEI 18.2</b>	Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.
-----------------	---

- ☐ Yes  
☒ No

**LEI 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

**LEI 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

**LEI 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

**LEI 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 and/or beneficiaries only
- ☐ We do not proactively disclose it to the public and/or clients/beneficiaries

**LEI 18.7**

Additional information. [Optional]

In our quarterly reporting as well as trustee orientation sessions, clients would receive a greater level of detail regarding our integration process since this is a proprietary methodology.

# British Columbia Investment Management Corporation

## 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.

bclMC has three dedicated professionals focused on engagement which includes proxy voting; direct dialogue with companies; collaborative engagements; and engagement with public policy makers and/or standard setters like industry associations. Our overall approach to engagement is fully described in our Shareholder Engagement Guidelines which identifies climate change; human rights; and shareholder rights as our engagement priority areas.

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

**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
<b>Individual/Internal staff engagements</b>	<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 type="checkbox"/> Other, specify <input type="checkbox"/> We do not engage via internal staff
<b>Collaborative engagements</b>	<input 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 Collaborative engagements are particularly useful for markets we do not have regular access to. <input type="checkbox"/> We do not engage via collaborative engagements
<b>Service provider engagements</b>	<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

<b>LEA 02.2</b>	Additional information. [Optional]
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We believe that interacting with companies on ESG risks brings more insight to our investment decisions and that by encouraging companies to manage ESG risks we are minimizing our own investment risk in the long term.

## 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.

For proactive engagements we prioritize our top 200 equity holdings by market value and filter these based on ESG performance to identify material risks and to determine a concentrated list of target engagement companies. In addition, while conducting proxy voting duties, we actively track companies with which we should follow up based on our research and voting decisions. Finally, we analyse broad ESG trends and best practices for managing ESG risks to identify campaign issues on which we should engage relevant companies.

Outside of proactive engagements, we also meet with companies visiting our office on sell-side marketing tours in order to raise ESG issues.

☐ 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.

We have instituted an internal database to track engagement activity including all contacts and correspondence with a company. Using this database, we are able to track company progress.

☐ No

## Process for engagements conducted via collaborations

**LEA 05****Mandatory****Core Assessed****PRI 2****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.

We have prioritized collaborative engagements for companies in overseas markets that are often difficult to access for foreign shareholders. When collaborative engagements are proposed we also factor in exposure to the issue, sector and companies involved to determine if it is a priority.

☐ No

**LEA 06****Mandatory****Core Assessed****PRI 2****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 look for policy changes and/or improvements in performance, and we utilize our internal database to track updates and/or the evaluation framework established by the PRI if it is a PRI collaboration.

☐ No

### General processes for all three groups of engagers

**LEA 09****Voluntary****Additional Assessed****PRI 1,2****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 type="radio"/> Yes, systematically <input checked="" type="radio"/> Yes, occasionally <input type="radio"/> No
Collaborative engagements	<input type="radio"/> Yes, systematically <input checked="" type="radio"/> Yes, occasionally <input type="radio"/> No

**LEA 09.2**

Additional information.

Our engagement specialists within the Equities team regularly share our insights and readily have informal discussions with investment teams.

**LEA 10****Mandatory****Gateway/Core Assessed****PRI 2****LEA 10.1**

Indicate if you track the number of engagements your organisation participates in.

Type of engagement	Tracking engagements
<b>Individual / Internal staff engagements</b>	<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
<b>Collaborative engagements</b>	<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

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

	<b>Number of companies engaged</b> (avoid double counting, see explanatory notes)
Individual / Internal staff engagements	158
Collaborative engagements	205

<b>LEA 11.2</b>	Indicate what percentage of your engagements were comprehensive during the reporting year. [Optional]
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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 checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> None

<b>LEA 11.3</b>	Indicate what percentage of your collaborative engagements you were a leading organisation on during the reporting year. [Optional]
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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

<b>LEA 12</b>	<b>Voluntary</b>	<b>Additional Assessed</b>	<b>PRI 2</b>
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<b>LEA 12.1</b>	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

<b>LEA 12.2</b>	Provide an estimated breakdown by E, S and/or G issues.
-----------------	---

	Individual / Internal staff engagements
--	---

	% Environmental only
--	----------------------

10

	% Social only
--	---------------

10

	% Corporate Governance only
--	-----------------------------

65

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

15

100%

	Collaborative engagements
--	---------------------------

	% Environmental only
--	----------------------

0

	% Social only
--	---------------

20

	% Corporate Governance only
--	-----------------------------

50

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

30

100%

LEA 12.3	Additional information.
----------	-------------------------

We are not classifying the collaborative engagements on Sustainable Palm Oil and Hydraulic Fracturing as purely environmental as the engagements also address human rights and community engagements; hence considering them overlapping ESG issues.

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.
----------	--

☐ Yes

☒ No

LEA 14	Voluntary	Descriptive	PRI 2
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LEA 14.1	Provide examples of the engagements that your organisation carried out during the reporting year.
----------	---

☒ Add Example 1

Topic or ESG issue	Multiyear Campaign Say on Pay - Canada
Conducted by	<input checked="" type="checkbox"/> Individual / Internal <input type="checkbox"/> Collaborative
Objectives	Encourage Canadian companies to voluntarily adopt say on pay as a way for shareholders to communicate with the board and inform the dialogue on executive compensation.
Scope and Process	Over the course of the last 2 years, bcIMC sent letters to all Canadian companies on the S&P/TSX Composite asking them to discuss adopting say on pay at their next Compensation Committee meeting. We followed-up with some companies that did not respond to our letters and continued dialogue with boards that were considering adopting such policies.
Outcomes	At this point in time, more than 120 Canadian companies have voluntarily offered shareholders with an advisory vote on executive compensation, compared to 99 in 2012.

☒ Add Example 2

Topic or ESG issue	PRI Collaborative Engagement on Hydraulic Fracturing
Conducted by	<input type="checkbox"/> Individual / Internal <input checked="" type="checkbox"/> Collaborative
Objectives	Recent focus on hydraulic fracturing (fracking) highlights the effect on water resources, greenhouse gas emissions, and local communities. Companies risk their social license to operate if they do not identify, manage and reduce fracking-related risks. We are encouraging them to implement best practices such as enhanced disclosure of policies, limit the use of fresh water, and invest in energy-efficient technologies.
Scope and Process	On behalf of our client Municipal Pension Plan, bcIMC serves as a steering committee member and a lead investor responsible for engaging with four Canadian companies. At this stage, the group of investors had 53 engagement meetings with 37 global companies.
Outcomes	A very positive outcome that took place at an early stage of the engagement phase is a commitment from a large integrated oil& gas company to issue a separate report on fracking-related risks.  We are awaiting an interim report on the status to date of this initiative.

☒ Add Example 3

Topic or ESG issue	Governance Feedback Campaign with US companies - iiWisdom platform
Conducted by	<input checked="" type="checkbox"/> Individual / Internal <input type="checkbox"/> Collaborative
Objectives	In order to reach out to the biggest US companies by market capitalization where dialogue between board directors and shareholders is more challenging, bcIMC opted for leveraging a new engagement platform called iiWisdom.
Scope and Process	bcIMC provided exhaustive written comments to the top 50 US companies by market capitalization via the iiWisdom platform. Topics addressed were: board composition& structure; board oversight of management as well as of social and environmental issues; strategic decision-making; engagement on and responsiveness to shareholders' concerns; and executive compensation.
Outcomes	All comments provided by bcIMC and other investor participants were provided to the targeted companies as an initial phase. We will track outcomes as companies disclose their 2015 annual information circulars.

☒ Add Example 4

Topic or ESG issue	Occupational Health & Safety - Executive Compensation
Conducted by	<input checked="" type="checkbox"/> Individual / Internal <input type="checkbox"/> Collaborative
Objectives	In addition to expecting companies to develop and implement strong health& safety (H&S) policies, bcIMC advocates in favor of including employee H&S-related metrics into executive incentive plans.
Scope and Process	bcIMC regularly meets with Canadian extractive companies and benchmarks them with best practices in the industry. More specifically, we communicated to a company's top management and board during a meeting that best practice is for companies to include a safety-related metric as part of their compensation programmes.
Outcomes	One large Canadian gold company implemented in 2014 a new safety metric weighted at 10% as part of its short-term incentive plan, reinforcing management's focus on the company's safety performance.

☒ Add Example 5

Topic or ESG issue	Executive Compensation
Conducted by	<input checked="" type="checkbox"/> Individual / Internal <input type="checkbox"/> Collaborative
Objectives	Executive compensation should be clearly disclosed, reasonable, have strong link to long-term performance and minimize non-performance or potential 'pay for failure' components. The board of directors and the Compensation Committee should demonstrate good stewardship of investor's interests and pay-for-performance should be emphasized in the compensation programme.
Scope and Process	After the proxy voting season, we use our voting records and meeting results as one way to inform and prioritise our engagements targets. Out of a list of Canadian companies we followed-up with, we sent a letter to a Canadian energy company which almost lost its say on pay vote with 43% vote against, to explain some of our concerns with the compensation programme. The company accepted a follow-up meeting and we met with the Chair of the Board and had a constructive dialogue on some of the features of the plan which we view as not enforcing a strong link between pay and performance.
Outcomes	The company mentioned it was considering making some changes in line with our feedback. We will assess the extent of the changes when the 2015 information circular gets published.

☒ Add Example 6



Topic or ESG issue	PRI Collaborative Engagement on Palm Oil
Conducted by	<input type="checkbox"/> Individual / Internal <input checked="" type="checkbox"/> Collaborative
Objectives	The palm oil industry has been linked to environmental and social impacts including increased greenhouse gas emissions, damage to ecosystem services and social conflicts. bclMC, along with our peers, aims to enhance companies' disclosure and certification of Roundtable on Sustainable Palm Oil (RSPO). We believe this will improve best practices across the value chain and support the development of a more sustainable industry.
Scope and Process	As a supporting investor part of this initiative, we have been taking part and contributing to collaborative dialogues with two major Southeast Asian palm oil growers.
Outcomes	Many retail companies have announced no-deforestation policies since the launch of the first phase of the initiative which was targeting major buyers. As a way for investors to engage with companies on implementing these milestone policies, the second phase of the initiative is targeting growers. While the world's largest producer of palm oil, Wilmar International, announced a no-deforestation, no peat, no exploitation policy in December 2013, investors are now engaging with companies on implementing these policies and on better assessing and addressing the risks through their supply chains.

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

## 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
-------------

<http://www.bcimc.com/ResponsibleInvesting/Reporting.asp>

**LEA 15.2**

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

- ☐ 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

**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 regularly update clients at scheduled meetings, and we provide updates upon request.

- ☐ 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).
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In 2014, we made the decision to transition from an internal database tracking our voting records to a new voting platform providing more voting and reporting efficiencies. We made the decision to disclose our vote recommendations along with rationales in real time ahead of AGMs. We consistently disclose a vote rationale when we vote against management recommendations and when we vote on a shareholder proposal.

We view proxy voting as the foundation of our shareholder engagement program because it is our opportunity each year to provide input on ESG issues with almost all of our portfolio companies. We vote all Canadian and US equities and the top 75% by market value of the rest of our equity holdings, translating into voting about 90% of the value of our total AUM. We conduct all proxy voting activities in-house, including researching the issues, internal consultations between portfolio managers, capital markets research analysts, engagement staff and on occasion the equities vice president, and/or engaging with some companies on contentious/high profile issues. If engagement under our Shareholder Engagement Guidelines fails to achieve results, we will file shareholder resolutions although this is a last resort.

### Process

LEA 17	Mandatory	Descriptive	PRI 2
--------	-----------	-------------	-------

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.

	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, except for some pre-defined scenarios for which we review and make voting decisions.
- ☐ We hire service provider(s) which make voting decisions on our behalf.

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:
- ☒ Participate in projects to improve the voting trail and/or to obtain vote confirmation
- ☐ None of the above

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.
----------	---

**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 21	Mandatory	Core Assessed	PRI 2
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<b>LEA 21.1</b>	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
- ☐ No
- ☐ Not applicable as we and/or our service providers do not abstain or vote against management recommendations

<b>LEA 21.2</b>	Additional information. [Optional]
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We often convey our voting record directly to Canadian companies during meetings and in some cases (ex, say on pay) via letters to the Chair of the relevant board committee.

## Outputs and outcomes

<b>LEA 22</b>	<b>Mandatory</b>	<b>Core Assessed</b>	<b>PRI 2</b>
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<b>LEA 22.1</b>	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%)
--	--------------------------------

	%
--	---

90

	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
- ☐ We do not track or collect this information

<b>LEA 22.3</b>	Additional information. [Optional]
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We vote all our Canadian and US holdings, in addition to the top 75% of international holdings by market value.

<b>LEA 23</b>	<b>Voluntary</b>	<b>Descriptive</b>	<b>PRI 2</b>
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<b>LEA 23.1</b>	Indicate if you track the voting instructions that you and/or your third party have issued on your behalf.
-----------------	--

☒ Yes, we track this information

<b>LEA 23.2</b>	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	<div> <div></div> <div>%</div> </div> 75
Against (opposing) management recommendations	<div> <div></div> <div>%</div> </div> 25
Abstentions	<div> <div></div> <div>%</div> </div> 0

100%

<b>LEA 23.3</b>	For the reporting year, describe your approach towards voting on shareholder resolutions.
-----------------	---

We analyse shareholder proposals on a case by case basis to determine whether the proposal protects shareholders, increases their rights, or increases companies' management of ESG risks in a way that is not overly prescriptive or burdensome. In 2014, we supported shareholder proposals 67% of the time, while we supported environmental proposals 64% of the time and climate change and GHG emissions disclosure proposals specifically 71% of the time.

☐ No, we do not track this information

<b>LEA 24</b>	<b>Voluntary</b>	<b>Descriptive</b>	<b>PRI 2</b>
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<b>LEA 24.1</b>	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

<b>LEA 25</b>	<b>Voluntary</b>	<b>Descriptive</b>	<b>PRI 2</b>
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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.

☒ Add Example 1

Topic or ESG issue	Executive Compensation & Board Responsiveness to Shareholders' Concerns– Oracle
Decision made by	<input checked="" type="checkbox"/> Internal staff <input type="checkbox"/> Service provider
Objectives	Executive compensation should be clearly disclosed, reasonable, have strong link to long-term performance and minimize non-performance or potential 'pay for failure' components. The board of directors and the Compensation Committee should demonstrate good stewardship of investor's interests and pay-for-performance should be emphasized in the compensation programme. Furthermore, the directors should be accountable for ratifying poor compensation practices and for not being responsive to shareholders' concerns.
Scope and Process	The company failed its say-on-pay (SOP) vote for 2 years in a row, and implemented very limited changes demonstrating low responsiveness to expressed shareholders' concerns. We voted against the advisory vote on executive compensation as pay is excessive and not align with performance, as the program lacks risk mitigation provisions and as there are numerous features that are not in line with best practices. Furthermore, while SOP votes are the channel through which we initially communicate our concerns regarding executive compensation, we escalated our voting recommendation and voted against all directors up for election considering continued governance issues and lack of accountability to shareholders' concerns. And given our concerns with executive compensation, we voted in favor of the shareholder proposals calling for the company to adopt multiple performance metrics for its short and long-term incentive plans and for the company to submit all equity compensation plans for shareholder approval in addition to the proposal calling for proxy access.
Outcomes	The company lost the say on pay vote for a third year with 54% votes against. The directors were re-elected but Compensation Committee members received an average of 25% vote against. While none of the shareholder proposals passed, they received a high level of support considering the founder and board chair has 25% of the voting rights.

☒ Add Example 2

Topic or ESG issue	Board Diversity & Female Representation - Bank of Nova Scotia (Shareholder Proposal)
Decision made by	<input checked="" type="checkbox"/> Internal staff <input type="checkbox"/> Service provider
Objectives	Nomination Committees should ensure that boards are inclusive of a diversity of perspectives that will ultimately lead to better decision-making. In some markets, there is regulatory pressure to boost gender diversity in particular. Since it is clear that reliance on market-based voluntary efforts has not resulted in any meaningful changes on gender diversity and that we recognize that disclosure alone does not result in real progress, bclMC advocated in favor of a target of 30% female representation on boards. This was part of a bclMC submission on Disclosure Requirements Regarding Women on Boards and in Senior Management to the Ontario Securities Commission in the context of a consultation.
Scope and Process	We voted in favour of a shareholder proposal calling for the filling of one out of 2 anticipated director vacancies with a female director. Even though the bank is a signatory to the Catalyst Accord, calling for corporate Canada to reach 25% women representation on boards by 2017, we do not consider this to be a stretch target for the bank as they were already above the 25% threshold when committing in 2013. And out of the bank's five disclosed Canadian peers, BNS with 29% of women of the board is below the 30% peer median. Hence, we supported a more prescriptive approach in this case.
Outcomes	While the proposal only received a disappointing 3% support, Scotia has nominated an additional female director at its 2015 AGM bringing its female representation to 38%.

☒ Add Example 3



Topic or ESG issue	Greenhouse Gas (GHG) Emissions Reduction Targets - Exxon Mobil (Shareholder Proposal)
Decision made by	<input checked="" type="checkbox"/> Internal staff <input type="checkbox"/> Service provider
Objectives	For proposals on environmental issues, we take a case-by-case approach with the aim of improving the firm's public image and reputation and reducing exposure to risks. We believe that companies who give careful consideration to issues of environmental responsibility will add long-term value to shareholders. We generally support requests for increased disclosure about the environmental impacts of a company's operations and products. We are closely monitoring climate change issues and support various initiatives to tackle this risk.
Scope and Process	<p>We consider the setting of GHG reduction targets as a specific risk management action. We voted in favor of this resolution for a second year in a row, as for similar resolutions at other companies, so that the company's actions and policies will enhance its reputation as a market leader and a responsible corporation, align with developing best practices and better prepare it to face potential regulatory changes and a lower carbon intensity future. In 2014, bclMC voted 64% of the time in favor of environmental shareholder proposals, and 71% of the time on climate change-related and GHG emissions disclosure proposals.</p> <p>There is merit in this proposal as some of the GHG goals adopted by the company had target dates of 2012. New targets would prepare the company for increasing regulatory scrutiny in the area of GHG emissions. Our vote positions align with our various engagements with companies, and initiatives such as the CDP, to obtain more disclosure on GHG emissions and associated reduction targets.</p>
Outcomes	In 2013, over 26% of the votes cast were in support of the resolution compared to an average 21% support for environmental and social shareholders' resolutions in the United States. In 2014, 22% of shareholders supported the same proposal. While our support in favor of the proposal focuses on the strength and timeline of the targets, the company is providing enhanced disclosure related to its management of environmental risks.

☒ Add Example 4

Topic or ESG issue	Executive Compensation & Board Independence and Effectiveness - Barrick Gold
Decision made by	<input checked="" type="checkbox"/> Internal staff <input type="checkbox"/> Service provider
Objectives	<p>We value director's independence as the board must be able to exert authority over management's recommendations and to objectively evaluate company and executive performance. This can be best achieved by constituting the board with a majority of independent directors and complementarity of skill sets.</p> <p>Executive compensation should be clearly disclosed, reasonable, have a strong link to long-term performance and minimize non-performance or potential 'pay for failure' components. The board of directors and the Compensation Committee should demonstrate good stewardship of investor's interests and pay-for-performance should be emphasized in the compensation programme.</p>
Scope and Process	<p>We voted against a few incumbent directors due to long tenure and concerns over independence and effectiveness. In addition, we supported only 2 of the 4 new nominees put forward as we did not think they were bringing the mix of skills necessary for this Board.</p> <p>While we recognize that many changes have been made to compensation going forward, we voted against the say-on-pay vote as we continue to be concerned with discretionary awards being made to the incoming Chair outside of any formal plan and which are not performance based.</p>
Outcomes	Over the course of the year following the 2014 AGM, bclMC met at different occasions with management and with board members to continue to convey in detail our concerns around board composition and compensation. The compensation programme has been revamped in line with some of our preference regarding certain features, but about 20% of shareholders continued to vote against compensation.

- ☐ Add Example 5
- ☐ Add Example 6
- ☐ Add Example 7
- ☐ Add Example 8
- ☐ Add Example 9
- ☐ Add Example 10

## Communication

LEA 26	Mandatory	Core Assessed	PRI 2,6
LEA 26.1	Indicate if your organisation proactively discloses information on your voting activities.		
<input checked="" type="radio"/> We disclose it publicly			

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

<http://www.bcimc.com/ResponsibleInvesting/Reporting.asp>

<b>LEA 26.2</b>	Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.
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☒ Yes

<b>LEA 26.3</b>	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

<b>LEA 26.4</b>	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

<b>LEA 26.8</b>	Additional information. [Optional]
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We explain all voting decisions that relate to shareholder proposals and all votes against management.

We are currently improving our reporting infrastructure to provide continuous reporting ahead of meetings. In March 2015, we started disclosing soon after votes are cast ahead of the AGM.

# British Columbia Investment Management Corporation

## 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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<b>FI 01.1</b>	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)
- ☒ Active - fundamental and other active strategies

	Percentage of internally managed fixed income - corporate
--	---

- ☐ <10%
- ☐ 10-50%
- ☒ >50%

	Fixed income – government
--	---------------------------

### Strategies

- ☐ Passive
- ☐ Active – quantitative (quant)
- ☒ 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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<b>FI 02.1</b>	Provide a breakdown of your internally managed fixed income investments by credit quality.
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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 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%

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
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Corporate bonds are an important part of our clients' portfolio. We recognize that flawed corporate governance practices can adversely impact bondholders by exposing us to excessive or unforeseen credit risk. Assessing governance issues - including ownership, executive succession planning, board effectiveness, compensation, and disclosure - is integral to our credit risk analysis. We are a founding member of the Canadian Bond Investors' Association (CBIA). This group, established in 2011, advocates for the rights of investors in Canadian bonds. We sit on the Board and are an active member of the advocacy committee. We urged securities regulators to strengthen issuer disclosure and tighten regulations around bond issuance. The CBIA has also encouraged rating agencies to disclose the new methodologies used to rate banks.

In 2013, the CBIA hosted an investor conference call on the topic of Great West Life and their tactic of using a consent fee. Investors were concerned about the precedent that Great West Life was setting in this case and investors conveyed their concerns to RBC who was advising Great West Life. In the end, Great West Life amended the consent solicitation which was a significant accomplishment for the CBIA.

## Fixed Income - Corporate

### Implementation processes

FI 04	Mandatory	Gateway/Core Assessed	PRI 1
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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)

Percentage of active corporate fixed income to which the strategy is applied (estimate +/- 10%)	<div> <div></div> <div>%</div> </div> <div>100</div>
---	--

- ☐ Screening + Integration strategies
- ☐ Thematic + integration strategies
- ☐ Screening + thematic strategies
- ☐ All three strategies combined
- ☐ No incorporation strategies applied

Total actively managed fixed income - corporate

100%

FI 04.2

Describe your primary reasons for choosing a particular incorporation strategy.

The primary reason is that this integration strategy utilizes the integration process already developed for equities. By integrating this strategy the goal is to improve risk-adjusted returns for our clients.

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.

#### Type of ESG information

- ☐ Raw ESG company data
- ☒ Issuer-related analysis or ratings



Describe who provides this information.

Our external research provider, MSCI, provides this information.

- ☐ Sector-related analysis or ratings
- ☐ Country-related analysis or ratings
- ☐ Screened bond list
- ☐ ESG issue-specific analysis or ratings
- ☐ Other, specify

### (C) Implementation: Integration of ESG factors

FI 10	Voluntary	Descriptive	PRI 1
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FI 10.1 Describe how you integrate ESG issues into investment decision-making processes.

ESG issues are considered in assessing whether the borrower is a creditworthy counterparty.

FI 11	Mandatory	Core Assessed	PRI 1
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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 11.2	Additional information. [Optional]
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In 2013, we implemented systematic reviews of ESG for corporate fixed income. On a case-by-case basis, further reviews would be carried out when the initial review indicates any problematic areas of concern.

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.
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- ☒ 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.
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- ☐ 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.
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☒ Yes

FI 13.2	Indicate for what percentage of your government fixed income investments you incorporate ESG issues in investment analysis and decision making.
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- ☒ <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 type="radio"/> We systematically review the potential significance of social issues and investigate them accordingly <input checked="" 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 type="radio"/> We systematically review the potential significance of corporate governance issues and investigate them accordingly <input checked="" 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

☐ No

## Communication

**FI 18****Mandatory****Core Assessed****PRI 2,6****FI 18.1**

Indicate if your organisation proactively discloses information on your approach to ESG incorporation in all fixed income investments.

☒ We disclose it publicly

Provide URL

<http://www.bcimc.com/publications/default.asp>

**FI 18.2**

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

☒ Yes

**FI 18.3**

Indicate the information your organisation proactively discloses to clients/ beneficiaries and 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.

- ☐ 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 it to the public and/or clients/beneficiaries

**FI 18.7**

Additional information. [Optional]

Our Annual Report has a section on how each asset class is approaching Responsible Investing.

# British Columbia Investment Management Corporation

## Reported Information

### Public version

#### Direct – Private Equity

## PRI disclaimer

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## Overview

PE 01

Mandatory to Report Voluntary to Disclose

Peering

General

PE 01.1

Provide a breakdown of your organisation's internally managed private equity investments by investment strategy.

Investment strategy	Percentage of your internally managed private equity holdings (in terms of AUM)
Venture capital	<input type="radio"/> >50% <input type="radio"/> 10-50% <input checked="" type="radio"/> <10% <input type="radio"/> 0%
Growth capital	<input type="radio"/> >50% <input checked="" type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%
(Leveraged) buy-out	<input checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%
	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%
	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%
<b>Total</b>	<b>100%</b>

PE 02

Mandatory to Report Voluntary to Disclose

Peering

General

<b>PE 02.1</b>	Indicate the level of ownership you typically hold in your private equity investments.
----------------	--

- ☐ a majority stake (>50%)
- ☐ 50% stake
- ☐ a significant minority stake (between 10-50%)
- ☒ a minority stake (<10%)
- ☐ a mix of ownership stakes

<b>PE 03</b>	<b>Voluntary</b>	<b>Descriptive</b>	<b>PRI 1-6</b>
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<b>PE 03.1</b>	Provide a brief overview of your organisation's approach to responsible investment in private equity.
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ESG factors are taken into account at all stages of an investment. bclMC takes into account ESG factors when performing due diligence on a potential investment. Such issues will affect attractiveness of the opportunity, valuation and strategy, as bclMC believes that ESG factors impact long-term returns. bclMC will continue to track certain ESG indicators during its ownership, on a case-by-case basis.

<b>PE 04</b>	<b>Mandatory</b>	<b>Core Assessed</b>	<b>PRI 2</b>
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<b>PE 04.1</b>	Indicate if your organisation's investment guidelines for private equity refer to responsible investment.
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- ☒ Our investment guidelines do refer to responsible investment

<b>PE 04.2</b>	Describe how your organisation's investment guidelines outline your expectations on staff and portfolio companies' approach towards ESG issues [Optional].
----------------	--

bclMC's Private Equity Responsible Investing Guideline identifies best practices in terms of Responsible Investing and is communicated to portfolio companies.

- ☐ Our investment guidelines do not refer to responsible investment
- ☐ We do not have investment guidelines

## Fundraising of private equity funds

<b>PE 05</b>	<b>Mandatory</b>	<b>Core Assessed</b>	<b>PRI 1,4,6</b>
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<b>PE 05.1</b>	Indicate if your fund placement documents (private placement memorandums (PPMs) or similar) refer to responsible investment aspects of your organisation.
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- ☐ Yes
- ☐ No
- ☒ Not applicable as our organisation does not fundraise

**PE 05.4**

Describe why your organisation does not fundraise.

bclMC is a captive asset manager.

PE 06	Voluntary	Additional Assessed	PRI 4
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**PE 06.1**

Indicate whether your organisation makes formal commitments in fund formation contracts, Limited Partnership Agreements (LPAs) or in side letters relating to responsible investment when requested by clients.

- ☒ We always make formal commitments to responsible investment in fund formation contracts, LPAs or side letters
- ☐ In a majority of cases we make formal commitments to responsible investment in fund formation contracts, LPAs or side letters
- ☐ In a minority of cases we make formal commitments to responsible investment in fund formation contracts, LPAs or side letters
- ☐ We do not make formal commitments to responsible investment in fund formation contracts, LPAs or side letters
- ☐ Our clients do not request us to make formal commitments to responsible investment in private equity

**PE 06.2**

Additional information.

This does not apply to our organization as we do not fundraise. However, bclMC is committed to taking ESG considerations into account when making investment as it believes it adds to long-term returns.

**Pre-investment (selection)**

PE 07	Mandatory	Gateway	PRI 1
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**PE 07.1**

Indicate if your organisation typically incorporates ESG issues when selecting private equity investments.

- ☒ Yes

**PE 07.2**

Describe your organisation's approach to incorporating ESG issues in private equity investment selection. [Optional]

Investments in private equity and infrastructure are often made with a very long-term outlook - sometimes beyond 20 years. As ESG issues can develop over time and affect companies, sectors and regions, assessing these factors are integral to our due diligence process for examining opportunities. In addition to financial performance, we assess the governance model of the prospective acquisition and commission detailed reports on legal, environmental, regulatory, and social factors. Potential risks are incorporated into our investment strategy. And depending on our ownership position, we may also play a more active role in addressing these risks with the companies. Our activities are aligned with the RPI's Responsible Investment in Private Equity guide for limited partners.

Our portfolio also includes a number of fund investments. In 2009, we endorsed the Institutional Limited Partners Association's Private Equity Principles, which provides a framework for governance and transparency.

- ☐ No



PE 08	Voluntary	Descriptive	PRI 1
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PE 08.1	Indicate whether your organisation typically uses ESG advice and research sourced internally and/or externally when incorporating ESG issues into the private equity investment selection process.
---------	--

☒ Internal staff

	Specify role
--	--------------

Legal counsel

☒ External resources

- ☒ Environmental advisors
- ☐ Social advisors
- ☐ Corporate governance advisors
- ☒ Regulatory and/or legal advisors
- ☒ Other, specify type of advisors/roles

Industry advisors

☐ No use of internal or external advice on ESG issues

PE 08.2	Additional information.
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The use of external resources/reports will be dependent on the deal in question and may involve a combination of the above.

PE 09	Mandatory	Core Assessed	PRI 1,3
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PE 09.1	Indicate which E, S and/or G issues are typically considered by your organisation in the investment selection process and list up to three typical examples per issue.
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**ESG issues**

☒ Environmental

	List up to three typical examples of environmental issues
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Waste water

Asbestos in building

Air filters update

☒ Social

	List up to three typical examples of social issues
--	--

Accidents

Relationship with unions

Relationship with community

☒ Governance

List up to three typical examples of governance issues

Policies adopted and implemented

PE 10	Voluntary	Additional Assessed	PRI 1,3
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<b>PE 10.1</b>	Indicate what type of ESG information your organisation typically considers during your private equity investment selection process.
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- ☒ Raw data from target company
- ☒ Benchmarks against other companies
- ☒ Sector level data/benchmarks
- ☒ Country level data/benchmarks
- ☒ Reporting standards, industry codes and certifications
- ☒ International initiatives, declarations or standards
- ☒ Engagements with stakeholders (e.g. customers and suppliers)
- ☒ Advice from external resources
- ☐ Other, specify
- ☐ We do not track this information

PE 11	Voluntary	Additional Assessed	PRI 1,2
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<b>PE 11.1</b>	During deal structuring, indicate if your organisation typically encourages continuous improvements from potential investees with regard to their management of ESG issues.
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- ☒ Yes
  - ☒ In writing
  - ☒ Verbally/through dialogue
  - ☐ Other, specify

<b>PE 11.2</b>	Describe the nature of these improvements and their ESG coverage.
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This is situation specific and will address items uncovered during the due diligence phase and that will be addressed to meet industry best practices.

- ☐ No

PE 12	Voluntary	Additional Assessed	PRI 1
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<b>PE 12.1</b>	Indicate if ESG issues impacted your private equity investment selection processes during the reporting year.
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- ☒ ESG issues helped identify risks and/or opportunities for value creation
- ☒ ESG issues led to the abandonment of potential investments
- ☒ ESG issues impacted the investment in terms of price offered and/or paid
- ☒ ESG issues impacted the terms in the shareholder/purchase agreements and/or lending covenants
- ☐ ESG issues were considered but did not have an impact on the investment selection process
- ☐ Other, specify
- ☐ We do not track this potential impact

## Post-investment (monitoring and active ownership)

<b>PE 13</b>	<b>Mandatory</b>	<b>Gateway/Core Assessed</b>	<b>PRI 2</b>
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<b>PE 13.1</b>	Indicate whether your organisation incorporates ESG issues in investment monitoring of portfolio companies.
----------------	---

☒ Yes

<b>PE 13.2</b>	Indicate the proportion of portfolio companies where your organisation included ESG performance in investment monitoring during the reporting year.
----------------	---

- ☐ >90% of portfolio companies
- ☐ 51-90% of portfolio companies
- ☒ 10-50% of portfolio companies
- ☐ <10% of portfolio companies

(in terms of total number of portfolio companies)

<b>PE 13.3</b>	Indicate ESG issues for which your organisation typically sets and monitors targets (KPIs or similar) and provide examples per issue.
----------------	---

### ESG issues

- ☒ Environmental

	List up to three example targets of environmental issues
--	--

Status of remediation

Incidents

- ☒ Social

	List up to three example targets of social issues
--	---

Relationship with workers

Health & safety issues

☒ Governance

List up to three example targets of governance issues

Change in management

Management incentive and alignment

☐ We do not set and/or monitor against targets

☐ No

PE 14	Mandatory	Core Assessed	PRI 2
-------	-----------	---------------	-------

PE 14.1

Indicate if your organisation tracks the proportion of your portfolio companies that have an ESG/sustainability-related policy (or similar guidelines).

☐ Yes

☒ No

PE 14.3

Additional information. [Optional]

This is identified and addressed during the due diligence phase. The majority of portfolio companies will have such policies, but no central tracking is done to determine the proportion of portfolio companies.

PE 15	Voluntary	Additional Assessed	PRI 2
-------	-----------	---------------------	-------

PE 15.1

Indicate the types of actions taken by your portfolio companies to incorporate ESG issues into operations and what proportion of your portfolio companies have implemented these actions.

**Types of actions taken by portfolio companies**

☐ Allocate responsibility for ESG issues to board/senior management

☐ Composition of board ensure ESG expertise

☒ Consider ESG issues in risk management processes

**Implemented by percentage of portfolio companies**

☒ >90% of portfolio companies

☐ 51-90% of portfolio companies

☐ 10-50% of portfolio companies

☐ <10% of portfolio companies

☐ We do not track this information

(in terms of total number of portfolio companies)

☒ Define performance targets for applicable ESG issues in operations

**Implemented by percentage of portfolio companies**

- ☐ >90% of portfolio companies
- ☐ 51-90% of portfolio companies
- ☐ 10-50% of portfolio companies
- ☐ <10% of portfolio companies
- ☒ We do not track this information

(in terms of total number of portfolio companies)

☒ Define when engagements with stakeholders should be carried out to discuss ESG issues

**Implemented by percentage of portfolio companies**

- ☐ >90% of portfolio companies
- ☐ 51-90% of portfolio companies
- ☐ 10-50% of portfolio companies
- ☐ <10% of portfolio companies
- ☒ We do not track this information

(in terms of total number of portfolio companies)

☒ Other actions, specify

**Implemented by percentage of portfolio companies**

Consider ESG factors in their internal policies and procedures

- ☒ >90% of portfolio companies
- ☐ 51-90% of portfolio companies
- ☐ 10-50% of portfolio companies
- ☐ <10% of portfolio companies
- ☐ We do not track this information

(in terms of total number of portfolio companies)

☐ None of the above

<b>PE 15.2</b>	Describe how your organisation contributes to the portfolio's management of ESG issues.
----------------	---

When bcIMC holds a board seat, it is able to address ESG issues, when required. Otherwise, bcIMC ensures that appropriate checks and balances are put in place at the onset of the investment.

<b>PE 16</b>	<b>Voluntary</b>	<b>Descriptive</b>	<b>PRI 2,3</b>
--------------	------------------	--------------------	----------------

<b>PE 16.1</b>	Indicate the type and frequency of reports you request and/or receive from portfolio companies covering ESG issues.
----------------	---

**Type of reporting**

- ☐ Overarching portfolio company reports (or similar) where management disclosure, financial and ESG data are integrated
- ☐ Standalone reports highlighting targets and/or KPIs covering ESG issues
- ☒ Other, specify

#### Typical reporting frequency

- ☐ Quarterly or more frequent
- ☐ Semi annually
- ☐ Annually
- ☐ Every two years or less
- ☒ Ad-hoc, specify

Depends on the nature of the issue/factor we are following up on

- ☐ No reporting on ESG issues requested and/or provided by portfolio companies

PE 17	Voluntary	Additional Assessed	PRI 2
-------	-----------	---------------------	-------

PE 17.1	Indicate whether your organisation discloses information on ESG issues to potential buyers prior to exit for private equity investments.
---------	--

- ☐ We always include ESG issues in pre-exit information
- ☒ We include ESG issues in pre-exit information in the majority of cases
- ☐ We include ESG issues in pre-exit information in the minority of cases
- ☐ We do not include ESG issues in pre-exit information

PE 17.2	Apart from disclosure, describe how your organisation considers ESG issues at exit.
---------	---

See below

PE 17.3	Additional information.
---------	-------------------------

bclMC does not typically lead the exits in its direct portfolio. However, it is expected that ESG considerations are included in pre-exit information as they provide valuable information to prospective buyers as best practices may add to the company's value.

### Outputs and outcomes

PE 18	Voluntary	Additional Assessed	PRI 1,2
-------	-----------	---------------------	---------

PE 18.1	Indicate if your organisation measures whether your approach to ESG issues in Private Equity investments has affected financial and/or ESG performance.
---------	---

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

<b>PE 18.2</b>	Describe how you are able to determine these outcomes.
----------------	--

As ESG KPIs are deal specific, it is difficult to adopt a standardized tool to measure ESG impact. Further, bcIMC typically invests in portfolio companies with best in class ESG practices.

<b>PE 19</b>	<b>Voluntary</b>	<b>Descriptive</b>	<b>PRI 1,3</b>
--------------	------------------	--------------------	----------------

<b>PE 19.1</b>	Provide examples of ESG issues that affected your private equity investments during the reporting year.
----------------	---

☒ Add Example 1

ESG issues	Governance
Sector(s)	Consumer Goods
Impact (or potential impact) on the investment	Reputational
Activities undertaken to influence the investment and its response	Implement change in policy and management

☐ Add Example 2

☐ Add Example 3

☐ Add Example 4

☐ Add Example 5

## Communication

<b>PE 20</b>	<b>Mandatory</b>	<b>Core Assessed</b>	<b>PRI 6</b>
--------------	------------------	----------------------	--------------

<b>PE 20.1</b>	Indicate whether your organisation proactively discloses ESG information on your private equity investments.
----------------	--

☒ Disclose publicly

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

<http://www.bcimc.com/publications/default.asp>

**PE 20.2**

Indicate whether the type of ESG information you proactively provide to the public is the same as that you provide to your clients (LPs)/beneficiaries.

- ☐ Yes  
☒ No

**PE 20.3**

Indicate the type of ESG information that your organisation proactively discloses to the public.

- ☐ ESG information in relation to our pre-investment activities  
☒ ESG information in relation to our post-investment monitoring and ownership activities  
☐ Information on our portfolio companies' ESG performance  
☐ Other, specify

**PE 20.4**

Indicate your organisation's typical frequency of disclosing ESG information to the public.

- ☐ Quarterly or more frequently  
☐ Semi annually  
☒ Annually  
☐ Every two years or less frequently  
☐ Ad-hoc, specify

**PE 20.5**

Indicate the type of ESG information that your organisation proactively discloses to your clients (LPs)/beneficiaries.

- ☒ ESG information in relation to our pre-investment activities  
☒ ESG information in relation to our post-investment monitoring and ownership activities  
☒ Information on our portfolio companies' ESG performance  
☐ Other, specify

**PE 20.6**

Indicate your organisation's typical frequency of disclosing ESG information to your clients (LPs)/beneficiaries.

- ☒ Quarterly or more frequently  
☐ Semi annually  
☐ Annually  
☐ Every two years or less frequently  
☐ Ad-hoc, specify

**PE 20.7**

Describe the ESG information and how your organisation proactively discloses it to the public and/or clients (LPs)/beneficiaries. [Optional]

bcIMC's annual report provides an overview on how Responsible Investing is addressed by each asset class, including private equity. Clients would receive more detailed information and more regular reporting within the quarterly report cycle.

- ☐ Disclose to investor clients (LPs)/beneficiaries only  
☐ No proactive disclosure to the public or to clients (LPs)/beneficiaries



PE 21	Voluntary	Descriptive	PRI 6
-------	-----------	-------------	-------

PE 21.1	Describe your organisation's approach to disclosing ESG incidents in private equity investments to your investor clients (LPs).
---------	---

Not applicable as bclMC does not have LPs.

# British Columbia Investment Management Corporation

## Reported Information

### Public version

#### Direct - Property

## 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

PR 01

Mandatory to Report Voluntary to Disclose

Gateway/Peering

General

PR 01.1

Provide a breakdown of your organisation's internally managed property investments by equity and debt.

### Property investments instruments

☒ Equity investments

Property investment instruments	Percentage of your internally managed property investments (in terms of AUM)
Equity investments	<input checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10%

PR 01.2

Indicate the level of ownership you typically hold in your property investments.

- ☒ a majority stake (>50%)  
☐ a 50% stake  
☐ a significant minority stake (between 10-50%)  
☐ a limited minority stake (<10%)  
☐ a mix of ownership stakes

☒ Debt investments

Property investment instruments	Percentage of your internally managed property investments (in terms of AUM)
Debt investments	<input type="radio"/> >50% <input type="radio"/> 10-50% <input checked="" type="radio"/> <10%

### Total 100%

☐ N/A, we manage properties, new constructions and/or refurbishments on behalf of our clients, but do not hold equity or debt in property on their behalf

PR 02

Mandatory to Report Voluntary to Disclose

Gateway/Peering

General

PR 02.1

Provide a breakdown of your organisation's property assets based on who manages the assets.

Property assets managed by	Breakdown of your property assets (by number)
Managed directly by your organisation	<input type="radio"/> >50% <input type="radio"/> 10-50% <input checked="" type="radio"/> <10% <input type="radio"/> 0%
Managed via third-party property managers appointed by you	<input checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%
Managed by other investors or their property managers	<input type="radio"/> >50% <input type="radio"/> 10-50% <input checked="" type="radio"/> <10% <input type="radio"/> 0%
Managed by tenant(s) with operational control	<input type="radio"/> > 50% <input type="radio"/> 10-50% <input type="radio"/> < 10% <input checked="" type="radio"/> 0%
<b>Total</b>	<b>100%</b>

PR 03	Voluntary	Descriptive	General
PR 03.1	Indicate up to three of your largest property types by AUM.		

Types	Main property types (by AUM)
Largest property type	<input type="radio"/> Industrial <input type="radio"/> Retail <input checked="" type="radio"/> Office <input type="radio"/> Residential <input type="radio"/> Leisure/Hotel <input type="radio"/> Mixed use <input type="radio"/> Other, specify
Second largest property type	<input type="radio"/> Industrial <input type="radio"/> Retail <input type="radio"/> Office <input checked="" type="radio"/> Residential <input type="radio"/> Leisure/Hotel <input type="radio"/> Mixed use <input type="radio"/> Other, specify
Third largest property type	<input checked="" type="radio"/> Industrial <input type="radio"/> Retail <input type="radio"/> Office <input type="radio"/> Residential <input type="radio"/> Leisure/Hotel <input type="radio"/> Mixed use <input type="radio"/> Other, specify

PR 05	Mandatory	Core Assessed	PRI 1-6
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PR 05.1	Indicate if your organisation has a Responsible Property Investment (RPI) policy.
---------	---

☒ Yes

PR 05.2	Provide a URL if your RPI policy is publicly available. [Optional]
---------	--

<http://www.bcimc.com/ResponsibleInvesting/Default.asp>

☐ No

PR 05.3	Additional information. [Optional]
---------	------------------------------------

this responsible investing policy (link above) is corporation-wide. this is not a link to our RPI strategy specifically, as this is not a public document.

## Fundraising of property funds

PR 06	Mandatory	Core Assessed	PRI 1,4,6
-------	-----------	---------------	-----------

PR 06.1	Indicate if your fund placement documents (private placement memorandums (PPMs) or similar) refer to responsible investment aspects of your organisation.
---------	---

- ☐ Yes  
☐ No  
☒ Not applicable as our organisation does not fundraise

PR 06.4	Describe why your organisation does not fundraise.
---------	--

not part of our core direction as an organization

PR 07	Voluntary	Additional Assessed	PRI 4
-------	-----------	---------------------	-------

PR 07.1	Indicate whether your organisation makes formal commitments in fund formation contracts, Limited Partnership Agreements (LPAs) or in side letters relating to responsible investment in property when requested by clients.
---------	---

- ☐ We always make formal commitment to responsible investment in fund formation contracts, LPAs or side letters  
☐ In a majority of cases we make formal commitment to responsible investment in fund formation contracts, LPAs or side letters  
☐ In a minority of cases we make formal commitment to responsible investment in fund formation contracts, LPAs or side letters  
☒ We do not make formal commitment to responsible investment in fund formation contracts, LPAs or side letters  
☐ Our clients do not request us to make formal commitments to responsible investment in property

## Pre-investment (selection)

PR 08	Mandatory	Gateway	PRI 1
-------	-----------	---------	-------

PR 08.1	Indicate if your organisation typically incorporates ESG issues when selecting property investments.
---------	--

- ☒ Yes

PR 08.2	Provide a description of your organisation's approach to incorporating ESG issues in property investment selection. [Optional]
---------	--

review efficiency/functionality of building (GHG emissions - electricity, waste, water, recycling, etc)  
 review operating expenses  
 review lease structures in place  
 review of existing or potential environmental certification programs

- ☐ No

PR 09	Voluntary	Descriptive	PRI 1,4
-------	-----------	-------------	---------

PR 09.1	Indicate whether your organisation typically uses ESG advice and research sourced internally and/or externally when incorporating ESG issues into the property investment selection process.
---------	--

- ☐ Internal staff
- ☒ External resources
  - ☒ Environmental advisors
  - ☐ Social advisors
  - ☐ Corporate governance advisors
  - ☒ Regulatory and/or legal advisors
  - ☐ Other, specify type of advisors/roles
- ☐ No use of internal or external advice on ESG issues

PR 10	Mandatory	Core Assessed	PRI 1,3
-------	-----------	---------------	---------

PR 10.1	Indicate which E, S and/or G issues are typically considered by your organisation in the property investment selection process and list up to three examples per issue.
---------	---

#### ESG issues

- ☒ Environmental

List up to three typical examples of environmental issues
---

GHG emissions - electricity, water, waste, recycling, etc  
alternative power sources - (i.e. solar power)

- ☐ Social
- ☐ Governance

PR 11	Voluntary	Additional Assessed	PRI 1,3
-------	-----------	---------------------	---------

PR 11.1	Indicate what type of ESG information your organisation typically considers during your property investment selection process.
---------	--

- ☐ Raw data from the target property asset/company
- ☒ Appraisals/audits
- ☒ Benchmarks/ratings against similar property asset
- ☐ Country level data/benchmarks
- ☐ Data aligned with established property reporting standards, industry codes and certifications
- ☐ International initiatives, declarations or standards
- ☐ Data from engagements with stakeholders (e.g. tenants and local community surveys)
- ☐ Information from external advisers
- ☐ Other, specify
- ☐ We do not track this information

PR 12	Voluntary	Additional Assessed	PRI 1
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<b>PR 12.1</b>	Indicate if ESG issues impacted your property investment selection process during the reporting year.
----------------	---

- ☐ ESG issues helped identify risks and/or opportunities for value creation
- ☐ ESG issues led to the abandonment of potential investments
- ☐ ESG issues impacted the investment in terms of price offered and/or paid
- ☐ ESG issues impacted the terms in the shareholder/purchase agreements and/or lending covenants
- ☒ ESG issues were considered but did not have an impact on the investment selection process
- ☐ Other, specify
- ☐ We do not track this potential impact

## Selection, appointment and monitoring third-party property managers

<b>PR 13</b>	<b>Mandatory</b>	<b>Core Assessed</b>	<b>PRI 4</b>
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<b>PR 13.1</b>	Indicate if your organisation includes ESG issues in your selection, appointment and/or monitoring of third-party property managers.
----------------	--

☒ Yes

<b>PR 13.2</b>	Indicate how your organisation includes ESG issues in your selection, appointment and/or monitoring of third party property managers.
----------------	---

- ☒ Selection process of property managers incorporated ESG issues
  - ☒ For all third party property managers
  - ☐ For a majority of property managers
  - ☐ For a minority of property managers
- ☒ Contractual requirements when appointing property managers includes ESG issues
  - ☒ For all third party property managers
  - ☐ For a majority of property managers
  - ☐ For a minority of property managers
- ☒ Monitoring of property managers covers ESG responsibilities and implementation
  - ☐ For all third party property managers
  - ☒ For a majority of property managers
  - ☐ For a minority of property managers

☐ No

## Post-investment (monitoring and active ownership)

### Overview

<b>PR 14</b>	<b>Mandatory</b>	<b>Gateway</b>	<b>PRI 2</b>
--------------	------------------	----------------	--------------



<b>PR 14.1</b>	Indicate if your organisation, and/or property managers, considers ESG issues in post-investment activities relating to your property assets.
----------------	---

☒ Yes

<b>PR 14.2</b>	Indicate whether your organisation, and/or property managers, considers ESG issues in the following post-investment activities relating to your property assets.
----------------	--

- ☒ We consider ESG issues in property monitoring and management
- ☒ We consider ESG issues in property developments and refurbishments
- ☒ We consider ESG issues in property occupier engagements
- ☒ We consider ESG issues in community engagements related to our properties
- ☐ We consider ESG issues in other post-investment activities, specify

☐ No

## Property monitoring and management

<b>PR 15</b>	<b>Mandatory</b>	<b>Core Assessed</b>	<b>PRI 2,3</b>
--------------	------------------	----------------------	----------------

<b>PR 15.1</b>	Indicate the proportion of property assets for which your organisation, and/or property managers, set and monitored ESG targets (KPIs or similar) during the reporting year.
----------------	--

- ☐ >90% of property assets
- ☐ 51-90% of property assets
- ☐ 10-50% of property assets
- ☒ <10% of property assets

(in terms of number of property assets)

<b>PR 15.2</b>	Indicate ESG issues for which your organisation, and/or property managers, typically sets and monitors targets (KPIs or similar) and provide examples per issue.
----------------	--

### ESG issues

- ☐ Environmental
- ☐ Social
- ☐ Governance
- ☒ We do not set and/or monitor against targets

## Property developments and refurbishments

<b>PR 17</b>	<b>Mandatory</b>	<b>Core Assessed</b>	<b>PRI 2</b>
--------------	------------------	----------------------	--------------

<b>PR 17.1</b>	Indicate the proportion of active property developments and refurbishments where ESG issues have been considered.
----------------	---

- ☒ >90% of active developments and refurbishments
- ☐ 51-90% of active developments and refurbishments
- ☐ 10-50% of active developments and refurbishments
- ☐ <10% of active developments and refurbishments
- ☐ N/A, no developments and refurbishments of property assets are active

(by number of active property developments and refurbishments)

<b>PR 17.2</b>	Indicate if the following ESG considerations are typically implemented and monitored in your property developments and refurbishments.
----------------	--

- ☒ Minimum environmental site selection requirements
- ☒ Minimum environmental site development requirements
- ☒ Sustainable construction materials
- ☒ Minimum water efficiency requirements
- ☒ Minimum energy efficiency requirements
- ☐ Energy generation from on-site renewable sources
- ☒ Waste management plans at sites
- ☒ Health and safety management systems at sites
- ☒ Construction contractors comply with sustainability guidelines
- ☐ Other, specify

## Occupier engagement

<b>PR 18</b>	<b>Mandatory</b>	<b>Core Assessed</b>	<b>PRI 2</b>
--------------	------------------	----------------------	--------------

<b>PR 18.1</b>	Indicate the proportion of property occupiers your organisation, and/or your property managers, engaged with on ESG issues during the reporting year.
----------------	---

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

(in terms of number of occupiers)

<b>PR 18.2</b>	Indicate if the following practises and areas are typically part of your, and/or your property managers', occupier engagements.
----------------	---

- ☒ Distribute a sustainability guide to occupiers
- ☒ Organise occupier events focused on increasing sustainability awareness
- ☒ Deliver training on energy and water efficiency
- ☒ Deliver training on waste minimisation
- ☒ Provide feedback on energy and water consumption and/or waste generation
- ☒ Provide feedback on waste generation
- ☒ Carry out occupier satisfaction surveys
- ☐ Other, specify

<b>PR 19</b>	<b>Voluntary</b>	<b>Additional Assessed</b>	<b>PRI 2</b>
--------------	------------------	----------------------------	--------------

<b>PR 19.1</b>	Indicate the proportion of all leases signed during the reporting year that used green leases or the proportion of Memoranda of Understandings (MoUs) with reference to ESG issues.
----------------	---

- ☐ >90% of leases or MoUs
- ☐ 51-90% of leases or MoUs
- ☒ 10-50% of leases or MoUs
- ☐ <10% of leases or MoUs
- ☐ 0% of leases or MoUs
- ☐ N/A, no leases or MoUs were signed during the reporting year

(in terms of number of leases or MoUs)

## Community engagement

<b>PR 20</b>	<b>Voluntary</b>	<b>Additional Assessed</b>	<b>PRI 2</b>
--------------	------------------	----------------------------	--------------

<b>PR 20.1</b>	Indicate in respect of what proportion of property assets your organisation, and/or your property managers, engaged with the community on ESG issues during the reporting year.
----------------	---

- ☐ >90% of property assets
- ☒ 51-90% of property assets
- ☐ 10-50% of property assets
- ☐ <10% of property assets

(in terms of number of property assets)

<b>PR 20.2</b>	Indicate if the following areas and activities are typically part of your, and/or your property managers', community engagement.
----------------	--

- ☐ ESG education programmes for the community
- ☐ ESG enhancement programmes for public spaces
- ☐ Research and networking activities focusing on ESG issues
- ☐ Employment creation in communities
- ☒ Supporting charities and community groups
- ☐ Other, specify

## Outputs and outcomes

<b>PR 21</b>	<b>Voluntary</b>	<b>Additional Assessed</b>	<b>PRI 1,2</b>
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<b>PR 21.1</b>	Indicate if your organisation measures whether your approach to ESG issues in property investments has affected financial and/or ESG performance.
----------------	---

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

<b>PR 21.2</b>	Describe how you are able to determine these outcomes.
----------------	--

Measured by external managers

<b>PR 22</b>	<b>Voluntary</b>	<b>Descriptive</b>	<b>PRI 1,3</b>
--------------	------------------	--------------------	----------------

<b>PR 22.1</b>	Provide examples of ESG issues that affected your property investments during the reporting year.
----------------	---

- ☒ Add Example 1

ESG issue	Water conservation
Types of properties affected	All property types
Impact (or potential impact) on investment	Reduce operating costs
Activities undertaken to influence the investment and the outcomes	Retrofitting older buildings, implementing water conservation techniques, applying new technology

- ☒ Add Example 2

ESG issue	Waste management
Types of properties affected	All property types
Impact (or potential impact) on investment	Reduce operating costs
Activities undertaken to influence the investment and the outcomes	Introduced robust recycling and compost programs; educated tenants

☒ Add Example 3

ESG issue	GHG emission reduction
Types of properties affected	All property types
Impact (or potential impact) on investment	Reduce operating costs, attract new tenants, extend investment life
Activities undertaken to influence the investment and the outcomes	Separate metering, tenant engagement, new technologies

☐ Add Example 4

☐ Add Example 5

## Communication

PR 23	Mandatory	Core Assessed	PRI 6
-------	-----------	---------------	-------

**PR 23.1** Indicate if your organisation proactively discloses ESG information on your property investments.

- ☐ Disclose publicly
- ☒ Disclose to clients/beneficiaries only

**PR 23.2** Indicate if your organisation uses property specific reporting standards to disclose information related to your property investments' ESG performance.

- ☐ Global Reporting Initiative (GRI) Construction & Real Estate Sector Supplement (CRESS)
- ☐ Other property reporting standards, specify
- ☒ No property specific reporting standards are used

**PR 23.6**

Indicate the type of ESG information that your organisation proactively discloses to your clients/beneficiaries.

- ☒ ESG information on how you select property investments
- ☒ ESG information on how you monitor and manage property investments
- ☒ Information on your property investments' ESG performance
- ☐ Other, specify

**PR 23.7**

Indicate your organisation's typical frequency of disclosing ESG information to the your clients/beneficiaries.

- ☒ Quarterly or more frequently
- ☐ Semi annually
- ☐ Annually
- ☐ Every two years or less frequently
- ☐ Ad-hoc, specify
- ☐ No proactive disclosure to the public or to clients/beneficiaries

# British Columbia Investment Management Corporation

## Reported Information

### Public version

#### Direct - Infrastructure

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## Overview

INF 01	Mandatory to Report Voluntary to Disclose	Gateway/Peering	General
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**INF 01.1** Provide a breakdown of your organisation's internally managed infrastructure investments by equity and debt.

Infrastructure investment instruments	Percentage of your internally managed infrastructure investments (in terms of AUM)
Equity investments	<input checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%
Debt investments	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%
<b>Total</b>	<b>100%</b>

**INF 01.2** Indicate the level of ownership you typically hold in your infrastructure investments.

- ☐ a majority stake (>50%)
- ☐ a 50% stake
- ☒ a significant minority stake (between 10-50%)
- ☐ a minority stake (<10%)
- ☐ a mix of ownership stakes
- ☐ N/A, we hold 100% debt investments

INF 02	Mandatory to Report Voluntary to Disclose	Gateway/Peering	General
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**INF 02.1** Provide a breakdown of your organisation's infrastructure assets based on who manages the assets.



Infrastructure assets managed by	Breakdown of your infrastructure assets (by number)
Managed directly by your organisation/companies owned by you	<input checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%
Managed via third-party operators appointed by your organisation/companies owned by you	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%
Managed by other investors/their third-party operators	<input type="radio"/> >50% <input type="radio"/> 10-50% <input checked="" type="radio"/> <10% <input type="radio"/> 0%
<b>Total</b>	<b>100%</b>

**INF 02.2**

Additional information. [Optional]

bclMC does not typically use third-party operators. We would typically have a direct equity stake in the company that controls the operations of infrastructure assets, hold board seats, and participate in various committees.

**INF 03**

Voluntary

Descriptive

General

**INF 03.1**

Indicate up to three of your largest infrastructure sectors by AUM.

Sector	Main infrastructure sectors (by AUM)
Largest infrastructure sector	<input type="radio"/> Transportation <input checked="" type="radio"/> Energy infrastructure <input type="radio"/> Conventional energy <input type="radio"/> Renewable energy <input type="radio"/> Water management <input type="radio"/> Waste management <input type="radio"/> Communication <input type="radio"/> Social infrastructure <input type="radio"/> Other, specify
Second largest infrastructure sector	<input type="radio"/> Transportation <input type="radio"/> Energy infrastructure <input type="radio"/> Conventional energy <input type="radio"/> Renewable energy <input checked="" type="radio"/> Water management <input type="radio"/> Waste management <input type="radio"/> Communication <input type="radio"/> Social infrastructure <input type="radio"/> Other, specify
Third largest infrastructure sector	<input checked="" type="radio"/> Transportation <input type="radio"/> Energy infrastructure <input type="radio"/> Conventional energy <input type="radio"/> Renewable energy <input type="radio"/> Water management <input type="radio"/> Waste management <input type="radio"/> Communication <input type="radio"/> Social infrastructure <input type="radio"/> Other, specify

INF 04	Voluntary	Descriptive	PRI 1-6
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INF 04.1	Provide a brief overview of your organisation's approach to responsible investment in infrastructure where you have equity stakes.
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bclMC's direct infrastructure program considers each investment's ESG factors as part of both the initial investment due diligence process and ongoing ESG monitoring. We use external consultants for select aspects of the initial ESG due diligence process, with the majority of the analysis being done in house.

INF 05	Mandatory	Core Assessed	PRI 1-6
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<b>INF 05.1</b>	Indicate if your organisation has a responsible investment policy for infrastructure.
<input checked="" type="radio"/> Yes <input type="radio"/> No	

## Fundraising of infrastructure funds

<b>INF 06</b>	<b>Mandatory</b>	<b>Core Assessed</b>	<b>PRI 1,4,6</b>
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<b>INF 06.1</b>	Indicate if your fund placement documents (private placement memorandums (PPMs) or similar) refer to responsible investment aspects of your organisation.
<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> Not applicable as our organisation does not fundraise	

<b>INF 06.4</b>	Describe why your organisation does not fundraise.
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bcIMC manages money on behalf of primarily public sector pension clients in the province of British Columbia. Our clients include public sector pension plans, public bodies, publicly administered trust funds, and government operating funds.

<b>INF 07</b>	<b>Voluntary</b>	<b>Additional Assessed</b>	<b>PRI 4</b>
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<b>INF 07.1</b>	Indicate whether your organisation makes formal commitments in fund formation contracts, Limited Partnership Agreements (LPAs) or in side letters relating to responsible investment in infrastructure when requested by clients.
<input type="radio"/> We always make formal commitment to responsible investment in fund formation contracts, LPAs or side letters <input type="radio"/> In a majority of cases we make formal commitment to responsible investment in fund formation contracts, LPAs or side letters <input type="radio"/> In a minority of cases we make formal commitment to responsible investment in fund formation contracts, LPAs or side letters <input type="radio"/> We do not make formal commitment to responsible investment in fund formation contracts, LPAs or side letters <input type="radio"/> Our clients do not request us to make formal commitments to responsible investment in infrastructure	

<b>INF 07.3</b>	Additional information.
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This does not apply to our organization as we do not fundraise. However, bcIMC is committed to taking ESG considerations into account when making investment as it believes it adds to long-term returns.

## Pre-investment (selection)

<b>INF 08</b>	<b>Mandatory</b>	<b>Gateway</b>	<b>PRI 1</b>
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<b>INF 08.1</b>	Indicate if your organisation typically incorporates ESG issues when selecting infrastructure investments.
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☒ Yes

<b>INF 08.2</b>	Describe your organisation's approach to incorporating ESG issues in infrastructure investment selection. [Optional]
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In respect to large direct investments we incorporate the following into our due diligence procedures pre-investment:

- Review the particular investment for specific concerns and work to 1) fully assess them through due diligence (sometimes with the help of external consultants), 2) assess the risk they pose over both a short and long term basis, 3) work to address the concerns through changes to the business, governance, price adjustments, etc.
- Commission detailed environmental reviews prior to investing using a respected 3rd party advisor;
- Negotiate detailed shareholder arrangements that define;the responsibilities of the new company board;
- shareholder rights.
- 
- Review employment policies and practices, stakeholder engagement, and assess level of interaction with the communities in which they operate;
- Conduct legal review of historic and current litigation;
- Review relationship with regulatory bodies including negative rulings or fines levied;
- Incorporate the results of the analysis above into our pro-forma plan including addressing areas identified as deficient.

☐ No

<b>INF 09</b>	<b>Voluntary</b>	<b>Descriptive</b>	<b>PRI 1,4</b>
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<b>INF 09.1</b>	Indicate whether your organisation typically uses ESG advice and research sourced internally and/or externally when incorporating ESG issues into the infrastructure investment selection process.
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- ☒ Internal staff
- ☐ Specify role
  - ☐ Specify role
  - ☐ Specify role
- ☒ External resources
- ☒ Environmental advisors
  - ☒ Social advisors
  - ☐ Corporate governance advisors
  - ☒ Regulatory and/or legal advisors
  - ☐ Other, specify type of advisors/roles
- ☐ No use of internal or external advice on ESG issues

<b>INF 10</b>	<b>Mandatory</b>	<b>Core Assessed</b>	<b>PRI 1,3</b>
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**INF 10.1**

Indicate which E, S and/or G issues are typically considered by your organisation in the investment selection process and list up to three typical examples per issue.

**ESG issues**

☒ Environmental

List up to three typical examples of environmental issues

Potential land contamination

Potential emissions issues

Waste management

☒ Social

List up to three typical examples of social issues

Health and safety

Labour conditions

Community involvement

☒ Governance

List up to three typical examples of governance issues

Appropriate ability to make change to the business, relative to our ownership percent

Board structure

Anti-bribery and corruption issues

**INF 11**

Voluntary

Additional Assessed

PRI 1,3

**INF 11.1**

Indicate what type of ESG information your organisation typically considers during your infrastructure investment selection process.

- ☒ Raw data from the target infrastructure asset/company
- ☒ Benchmarks/ratings against similar infrastructure asset
- ☒ Sector level data/benchmarks
- ☒ Country level data/benchmarks
- ☒ Reporting standards, infrastructure sector codes and certifications
- ☒ International initiatives, declarations or standards
- ☒ Engagements with stakeholders (e.g. contractors and suppliers)
- ☒ Advice from external sources
- ☐ Other, specify
- ☐ We do not track this information

**INF 12**

Voluntary

Additional Assessed

PRI 1

<b>INF 12.1</b>	Indicate if ESG issues impacted your infrastructure investment selection processes during the reporting year.
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- ☒ ESG issues helped identify risks and/or opportunities for value creation
- ☒ ESG issues led to the abandonment of potential investments
- ☒ ESG issues impacted the investment in terms of price offered and/or paid
- ☒ ESG issues impacted the terms in the shareholder/purchase agreements and/or lending covenants
- ☐ ESG issues were considered but did not have an impact on the investment selection process
- ☐ Other, specify
- ☐ We do not track this potential impact

## Post-investment (monitoring and active ownership)

### Overview

<b>INF 14</b>	<b>Mandatory</b>	<b>Gateway</b>	<b>PRI 2</b>
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<b>INF 14.1</b>	Indicate if your organisation, and/or operators, consider ESG issues in post-investment activities relating to your infrastructure assets.
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☒ Yes

<b>INF 14.2</b>	Indicate how your organisation, and/or operators, considers ESG issues in the following post-investment activities relating to your infrastructure assets.
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- ☒ We consider ESG issues in the monitoring and operation of infrastructure
- ☒ We consider ESG issues in infrastructure maintenance
- ☒ We consider ESG issues in stakeholder engagements related to our infrastructure
- ☐ We consider ESG issues in other post-investment activities, specify

<b>INF 14.3</b>	Describe how your organisation, and/or operators, considers ESG issues in post-investment activities related to your infrastructure investments. [Optional]
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bclMC invests in stand-alone companies with internalised operations teams. ESG policies are therefore established and enforced at the Board level. bclMC generally seeks to make investments material enough to occupy a Board seat. We expect our companies to exhibit good corporate social responsibility, and expect management teams to foster a culture of engaging with the communities they operate in. Management teams provide status reports detailing ESG issues to the Board and directly to shareholders as part of standard reporting requirements. Sub-committees are established to address ESG issues as required.

☐ No

## Infrastructure monitoring and operations

<b>INF 15</b>	<b>Mandatory</b>	<b>Core Assessed</b>	<b>PRI 2</b>
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<b>INF 15.1</b>	Indicate the proportion of infrastructure assets where your organisation, and/or operators, included ESG performance in investment monitoring during the reporting year.
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- ☒ >90% of infrastructure assets
- ☐ 51-90% of infrastructure assets
- ☐ 10-50% of infrastructure assets
- ☐ <10% of infrastructure assets

(in terms of number of infrastructure assets)

<b>INF 15.2</b>	Indicate ESG issues for which your organisation, and/or operators, typically sets and monitors targets (KPIs or similar) and provide examples per issue.
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☒ Environmental

	List up to three example targets per issue
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Spills and other operational issues

☒ Social

	List up to three example targets per issue
--	--

Health and safety

☒ Governance

	List up to three example targets per issue
--	--

Board and committee membership

☐ We do not set and/or monitor against targets

<b>INF 16</b>	<b>Mandatory</b>	<b>Additional Assessed</b>	<b>PRI 2</b>
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<b>INF 16.1</b>	Indicate if you track the proportion of your infrastructure investees that have an ESG/sustainability-related policy (or similar guidelines).
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- ☐ Yes
- ☒ No

<b>INF 17</b>	<b>Voluntary</b>	<b>Descriptive</b>	<b>PRI 2,3</b>
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<b>INF 17.1</b>	Indicate the type and frequency of reports you request and/or receive from infrastructure investees covering ESG issues.
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#### Type of Reporting

☒ Overarching portfolio asset/company reports or similar where management disclosure, financial and ESG data are integrated

	Typical reporting frequency
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- ☒ Quarterly or more frequent
- ☐ Semi annually
- ☐ Annually
- ☐ Every two years or less
- ☐ Ad-hoc, specify
- ☐ Standalone reports highlighting targets and/or KPIs covering ESG issues
- ☐ Other, specify
- ☐ No reporting on ESG issues requested and/or provided by infrastructure investees

## Infrastructure maintenance

INF 18	Mandatory	Core Assessed	PRI 2
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INF 18.1	Indicate the proportion of active infrastructure maintenance projects where ESG issues have been considered.
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- ☒ >90% of active maintenance projects
- ☐ 51-90% of active maintenance projects
- ☐ 10-50% of active maintenance projects
- ☐ <10% of active maintenance projects
- ☐ N/A, no maintenance projects of infrastructure assets are active

(in terms of number of active maintenance projects)

## Stakeholder engagement

INF 19	Voluntary	Additional Assessed	PRI 2
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INF 19.1	Indicate which stakeholders your organisation, and/or operators, engaged with on ESG issues in relation to your infrastructure assets during the reporting year and what proportion of your investments they apply to.
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	Stakeholders engaged
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- ☒ Regulators

	Percentage of infrastructure assets these apply to
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- ☐ >90% of infrastructure assets
- ☒ 51-90% of infrastructure assets
- ☐ 10-50% of infrastructure assets
- ☐ <10% of infrastructure assets



(in terms of number of infrastructure assets)

☒ Communities

	Percentage of infrastructure assets these apply to
--	--

- ☐ >90% of infrastructure assets
- ☒ 51-90% of infrastructure assets
- ☐ 10-50% of infrastructure assets
- ☐ <10% of infrastructure assets

(in terms of number of infrastructure assets)

☒ Other stakeholder, specify

Other shareholders and employees

	Percentage of infrastructure assets these apply to
--	--

- ☒ >90% of infrastructure assets
- ☐ 51-90% of infrastructure assets
- ☐ 10-50% of infrastructure assets
- ☐ <10% of infrastructure assets

(in terms of number of infrastructure assets)

☐ Other stakeholder, specify

## Outputs and outcomes

INF 20	Voluntary	Additional Assessed	PRI 1,2
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INF 20.1	Indicate if your organisation measures whether your approach to ESG issues in Infrastructure investments has affected financial and/or ESG performance.
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- ☐ We measure whether our approach to ESG issues impacts funds' financial performance
- ☐ We measure whether our approach to ESG issues impacts funds' ESG performance
- ☒ None of the above

## Communication

INF 22	Mandatory	Core Assessed	PRI 6
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INF 22.1	Indicate if your organisation proactively discloses ESG information on your infrastructure investments.
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- ☒ Disclose publicly

please provide URL

<http://www.bcimc.com/>

please provide URL

<http://www.bcimc.com/publications/Default.asp>

**INF 22.2**

Indicate if the level of ESG information you provide to the public is the same as the level you provide to your clients/beneficiaries.

- ☐ Yes  
☒ No

**INF 22.3**

Indicate the type of ESG information that your organisation proactively discloses to the public.

- ☐ ESG information on how you select infrastructure investments  
☐ ESG information on how you monitor and manage infrastructure investments  
☒ Information on your infrastructure investments' ESG performance  
☒ Other; specify

We provide a quarterly RI newsletter to the public which focuses on various ESG themes as well as an annual Responsible Investing report.

**INF 22.4**

Indicate your organisation's typical frequency of disclosing ESG information to the public.

- ☒ Quarterly or more frequently  
☐ Semi annually  
☐ Annually  
☐ Every two years or less frequently  
☐ Ad-hoc; specify

**INF 22.5**

Indicate the type of ESG information that your organisation proactively discloses to your clients/beneficiaries.

- ☒ ESG information on how you select infrastructure investments  
☒ ESG information on how you monitor and manage infrastructure investments  
☒ Information on your infrastructure investments' ESG performance  
☐ Other; specify

**INF 22.6**

Indicate your organisation's typical frequency of disclosing ESG information to your clients/beneficiaries.

- ☐ Quarterly or more frequently
- ☐ Semi annually
- ☒ Annually
- ☐ Every two years or less frequently
- ☐ Ad-hoc; specify
- ☐ Disclose to clients/beneficiaries only
- ☐ No proactive disclosure to the public or to clients/beneficiaries

**INF 23****Voluntary****Descriptive****PRI 6****INF 23.1**

Describe your organisation's approach to disclosing ESG incidents in infrastructure investments to your investor clients.

Not applicable as bclMC does not have investor clients.