

PRI REPORTING FRAMEWORK 2020 – SERVICE PROVIDERS

Strategy and Governance (SG)

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# Understanding this document

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

**Top bar**

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

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|  | Indicator status | Purpose  GATEWAY |
| xxx 01 | MANDATORY |

**Indicator status**

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

**Purpose**

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

**Underneath the indicator**

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

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

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# Pathways through the module

**SG 01:** Policy on ESG beliefs and public availability

If you have policies/formalized guidelines

**SG 02:** Norms used to develop policies

**SG 03:** Policy offerings to clients

Only applicable if you have some of your revenue derived from ESG as supplementary/integrated services

**SG 04:** ESG/RI in business offerings

**SG 05:** Outsourcing of services

**SG 06:** Providing training/education

**SG 07:** Applying, advancing and promoting the PRI principles

**SG 08:** Actions taken to promote responsible investment

**SG 09:** Long term trends

**SG 10:** Interaction with asset owners

**SG 11:** Aligning approach with investor goals

**SG 12:** ESG recommendations not aligned with investor goals

**SG 13:** Seeking feedback from clients

**SG 14:** Managing conflicts of interest

# Preface

The information reported in this module will enable your stakeholders to understand your organisation’s approach to responsible investment and ESG services (i.e. your governance; policies that cover your approach; how you apply, promote, and advance the Principles; and how you take into account long term risks). You can also report on how you interact with clients and incorporate feedback.

**Summary of updates**

There have been no changes to the wording or structure of indicators in this module since 2019.

For a detailed description of changes, please see [here](https://d8g8t13e9vf2o.cloudfront.net/Uploads/b/s/e/2020updatesofindicatorssp_710352.xlsx).

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| SECTION |
| Policy on ESG beliefs |

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|  | Indicator status | Purpose  GATEWAY |
| SG 01 | MANDATORY |

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| SG 01 | INDICATOR | | |
| **SG 01.1** | Describe how your organisation’s philosophy incorporates environmental, social and governance factors, and the link to your business offerings. | | |
|  | | |
| **SG 01.2** | Indicate whether you have policies that formalise the incorporation of your ESG beliefs in your business offerings. | | |
| 🔾 Yes | 🔾 No | |
| **SG 01.3** | Indicate the components/types of your internal policy and provide the URL and/or an attachment of the document/s if they are publicly available. | | |
| Policy components/types | URL | Attachment |
| ❑ [a]Policy setting out your overall ESG/RI approach |  |  |
| ❑ [b]Formalised guidelines on environmental factors |  |  |
| ❑ [c]Formalised guidelines on social factors |  |  |
| ❑ [d]Formalised guidelines on corporate governance factors |  |  |
| ❑ [e]Formalised guidelines on engagement approach |  |  |
| ❑ [f] Formalised guidelines on (proxy) voting approach |  |  |
| ❑ [g]Other, specify (1)\_\_\_\_\_\_\_\_ |  |  |
| ❑ [h] Other, specify (2)\_\_\_\_\_\_\_\_ |  |  |
| 🔾 None of the above |  |  |
| **SG 01.4** | Indicate how these are put into practice internally across the organisation. | | |
| ❑ Regular employee training on RI/ESG  ❑ Regular RI/ESG policy awareness building for employees  ❑ Establishment of policy review committee/team  ❑ Remuneration linked to achieving ESG objectives  ❑ Annual performance incentives  ❑ Other, specify (1) \_\_\_\_  ❑ Other, specify (2) \_\_\_\_  ❑ Other, specify (3) \_\_\_\_ | | |
| **SG 01.5** | Additional information  [optional] | | |
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| SG 01 | **EXPLANATORY NOTES** |
| **SG 01.1** | State here your organisational commitment to RI/ ESG and how this influences your business model. You can include a link to a public website or documents that explain further.  To find out more on how your peers have responded on this practice, view our analysis and visualisation in the [service provider interactive snapshot report](https://app.powerbi.com/view?r=eyJrIjoiMGNlMTcyYzYtODI2MC00YjcwLTg2YjAtMDNmNTc5ZmNhYThjIiwidCI6ImZiYzI1NzBkLWE5OGYtNDFmMS1hOGFkLTEyYjEzMWJkOTNlOCIsImMiOjh9) available on the Data Portal and the PRI website. |
| **SG 01.3** | Policy here refers to an overall statement of how you approach responsible investment, or ESG issues, in your activities. Such a policy will normally address a broad range of issues and outline the activities an organisation undertakes to address them. Whether or not you have such an overall policy, you may have guidelines on ESG or responsible investment issues within other policies (e.g. on specific issues such as corporate governance or climate change; on specific activities such as voting).  This section does not focus on policies covering office or operational management (e.g., recycling).  *Policy components/types*  The policies listed here may be contained in a single document or multiple separate documents. You may therefore be able to tick multiple boxes.  To find out more on how your peers have responded on this practice, view our analysis and visualisation in the [service provider interactive snapshot report](https://app.powerbi.com/view?r=eyJrIjoiMGNlMTcyYzYtODI2MC00YjcwLTg2YjAtMDNmNTc5ZmNhYThjIiwidCI6ImZiYzI1NzBkLWE5OGYtNDFmMS1hOGFkLTEyYjEzMWJkOTNlOCIsImMiOjh9) available on the Data Portal and the PRI website. |
| **SG 01.5** | If your policy on your ESG approach to your business and services, other responsible investment-related policies, or guidance documents are not publicly available, you may indicate whether you plan to publish them in the future or why you do not intend to do so. |
| **LOGIC** | |
| **SG 01** | SG 01.3 – 01.4 will be applicable if you report “Yes” in SG 01.2.  SG 02 will be applicable if you report “Yes” in SG 01.2. |

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

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|  | Indicator status | Purpose  DESCRIPTIVE |
| SG 02 | MANDATORY |

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| **SG 02** | INDICATOR |
| **SG 02.1** | Indicate what frameworks and guidelines you have used to develop your organisation’s policies. Tick all that apply. |
| ❑ UN Principles for Responsible Investment  ❑ UN Global Compact Principles  ❑ UN Guiding Principles on Business and Human Rights  ❑ Universal Declaration of Human Rights  ❑ UN Sustainable Development Goals  ❑ International Bill of Human Rights  ❑ International Labour Organisation Conventions  ❑ IFC Performance Standards  ❑ United Nations Convention Against Corruption  ❑ OECD Principles of Corporate Governance  ❑ OECD Guidelines for Multinational Enterprises  ❑ GRI standards  ❑ Other, specify (1)\_\_\_\_\_  ❑ Other, specify (2)\_\_\_\_\_  ❑ Other, specify (3)\_\_\_\_\_  🔾 None of the above |
| **SG 02.2** | Additional information.  [OPTIONAL] |
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| SG 02 | **EXPLANATORY NOTES** |
| **SG 02.1** | This indicator focuses on the types of international norms that were used to develop your policy.  To find out more on how your peers have responded on this practice, view our analysis and visualisation in the [service provider interactive snapshot report](https://app.powerbi.com/view?r=eyJrIjoiMGNlMTcyYzYtODI2MC00YjcwLTg2YjAtMDNmNTc5ZmNhYThjIiwidCI6ImZiYzI1NzBkLWE5OGYtNDFmMS1hOGFkLTEyYjEzMWJkOTNlOCIsImMiOjh9) available on the Data Portal and the PRI website. |

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|  | Indicator status | Purpose  DESCRIPTIVE |
| SG 03 | MANDATORY |

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| **SG 03** | INDICATOR | | |
| **SG 03.1** | Indicate whether you offer standard, off the shelf, policies to clients as part of your product offerings, and/or whether you create tailored versions for individual clients. | | |
|  | Off the shelf | Tailored |
| Asset class-specific RI guidelines | ❑ | ❑ |
| Sector-specific RI guidelines | ❑ | ❑ |
| Screening/exclusions policy | ❑ | ❑ |
| Engagement policy | ❑ | ❑ |
| (Proxy) voting policy | ❑ | ❑ |
| RI guidelines set out within the Investment Policy Statement (IPS) | ❑ | ❑ |
| RI guidelines set out in a freestanding RI policy | ❑ | ❑ |
| Multi-year RI implementation project plan | ❑ | ❑ |
| Conflict of interest management policy | ❑ | ❑ |
| Stockbroker allocation policy | ❑ | ❑ |
| Securities lending policy | ❑ | ❑ |
| Other, please specify (1)\_\_\_\_ | ❑ | ❑ |
| Other, please specify (2)\_\_\_\_ | ❑ | ❑ |
| Other, please specify (3)\_\_\_\_ | ❑ | ❑ |
| 🔾 None of the above | | |
| **SG 03.2** | Provide a brief description of the key elements, any variations, or exceptions applying to these policies. | | |
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| **SG 03.3** | Additional information  [OPTIONAL] | | |
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| SG 03 | **EXPLANATORY NOTES** |
| **SG 03.2** | You may wish to comment on:   * the typical scope of the policies; * how frequently it is reviewed by the client; * any significant exceptions to the policies; * how the policies are typically implemented by the clients. |
| **LOGIC** | |
| **SG 03** | SG 03.2 will be applicable if you report on any of the options listed in SG 03.1, except for ‘None of the above’. |

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|  | Indicator status | Purpose  DESCRIPTIVE |
| SG 04 | MANDATORY |

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| SG 04 | INDICATOR | | | |
| **SG 04.1** | Briefly describe how you include ESG/RI factors as part of your business offerings. | | | |
| **Business area** | | **How you incorporate ESG/RI factors** | |
| [a]Reporting | | (Max 250) | |
| [b] Active Ownership Services | |  | |
| [c] Investment Consultancy | |  | |
| [d] Research and Data Provision | |  | |
| [e] Other, specify (1) \_\_\_\_ | |  | |
| [f] Other, specify (2)\_\_\_\_\_ | |  | |
| [g] Other, specify (3)\_\_\_\_\_ | |  | |
| [h] Other, specify (4)\_\_\_\_\_ | |  | |
| **SG 04.2** | Indicate the roles in your organisation, and indicate for each whether they have oversight and/or implementation responsibilities for ESG/RI within the organisation. | | | |
| **Roles present in your organisation** | | **Oversight/accountability for ESG/RI** | **Implementation of ESG/RI** |
| Board | | ❑ | ❑ |
| Directors | | ❑ | ❑ |
| Chief Executive Officer (CEO), Chief Financial Officer (CFO) | | ❑ | ❑ |
| Chief Operating Officer (COO), Chief Information Officer (CIO) | | ❑ | ❑ |
| Other chief-level staff, specify\_\_\_\_ | | ❑ | ❑ |
| Other heads of department, specify\_\_\_\_ | | ❑ | ❑ |
| Dedicated ESG/RI staff | | ❑ | ❑ |
| Other role, specify (1)\_\_\_\_ | | ❑ | ❑ |
| Other role, specify (2)\_\_\_\_ | | ❑ | ❑ |
| Other role, specify (3)\_\_\_\_ | | ❑ | ❑ |
| None of the above | | ❑ | ❑ |
| **SG 04.3** | Indicate how you ensure ESG/RI expertise for the roles where there are RI oversight/accountability or implementation responsibilities. | | | |
| ❑ Staff training on ESG/RI incorporation | | | |
| ❑ Including ESG/RI knowledge factors in personal development goals | | | |
| ❑ Having development plans that aim to enhance ESG/RI knowledge of certain departments/teams/individuals | | | |
| ❑ Including ESG in selection requirements when hiring new employees | | | |
| ❑ Other, specify (1)\_\_\_\_ | | | |
| ❑ Other, specify (2)\_\_\_\_ | | | |
| ❑ Other, specify (3)\_\_\_\_ | | | |
| ❑ Other, specify (4)\_\_\_\_ | | | |
| **SG 04.4** | Indicate whether your organisation has any ESG/RI linked incentives for its employees. | | | |
| 🔾 Yes | 🔾 No | 🔾 Not applicable, we ensure that employees incorporate ESG/RI into services through other mechanisms | |
| **SG 04.5** | Describe the ESG/RI linked incentives. | | | |
|  | | | |
| **SG 04.6** | Describe how you ensure that your employees incorporate ESG/RI into services through other mechanisms than ESG/RI linked incentives. | | | |
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| **SG 04.7** | Additional information  [OPTIONAL] | | | |
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| SG 04 | **EXPLANATORY NOTES** |
| **SG 04.1** | Organisations may take a different approach to the inclusion of ESG and RI factors when they are an underlying part of their offerings, as compared to an ESG supplementary product. This indicator allows you to briefly describe the approach of your organisation. |
| **SG 04.2** | Oversight and implementation are differentiated as follows.  Individuals with **oversight** roles are those with management or governance responsibility for ensuring that the organisation implements its policies and achieves its objectives and targets in relation to RI/ESG performance.  Individuals with **implementation** roles are those charged with implementing specific aspects of the organisation’s RI/ESG practices, for example, conducting ESG-related research, incorporating ESG issues into asset allocation advice, voting recommendations and engagement prioritization. |
| **SG 04.4** | ESG/RI linked incentives might be monetary, recognition or exposure, and can be applicable for a number of areas, e.g. ensuring policy implementation, compensation linked to investment manager performance and similar.  You may wish to specify whether there is a different approach to ESG/RI-linked incentives for employees working with ESG integrated products compared to ESG supplementary products. |
| **LOGIC** | |
| **SG 04.1** | The options (business areas) available to you in this table depend on the information you reported in OO 05.1 |
| **SG 04.2** | Selecting any of the options in SG 04.2, except for ‘None of the above’, will unlock SG 04.3. |
| **SG 04.4** | Selecting ‘Yes’ will unlock SG 04.5. Selecting ‘Not applicable, we ensure that employees incorporate ESG/RI into services through other mechanisms’ will unlock SG 04.6 |

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|  | Indicator status | Purpose  DESCRIPTIVE |
| SG 05 | MANDATORY TO REPORT, VOLUNTARY TO DISCLOSE |

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| SG 05 | INDICATOR | |
| **SG 05.1** | Indicate whether you outsource some of your services. Report percentage of services outsourced as percentage for that specific business area. | |
| **Business area** | **Percentage of service outsourced** |
| ❑ Reporting | [Dropdown – broad ranges] % |
| ❑ Active Ownership Services | % |
| ❑ Investment Consultancy | % |
| ❑ Research and Data Provision | % |
| ❑ Other, specify (1)\_\_\_\_\_\_\_ | % |
| ❑ Other, specify (2)\_\_\_\_\_\_\_ | % |
| ❑ Other, specify (3)\_\_\_\_\_\_\_ | % |
| 🔾 None of the above | |
| **SG 05.2** | For each business area, describe what components you outsource to other organisations. | |
|  | |
| **SG 05.3** | For each business area, describe how you ensure the organisation implementing your outsourced services adheres to your beliefs and policies on ESG/RI. | |
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| SG 05 | **EXPLANATORY NOTES** |
| **SG 05** | Any form of collaboration with external partners where the external partner receives payment from your organisation for the execution of services or advice on behalf of your organisation should be reported here as outsourced services.  The outsourced services can be enlisted for additional revenue on an ad-hoc basis, but can also include regular/permanent outsourcing of services that may not necessarily result in an explicit addition to revenue. As an example, a client might request an analysis of a portfolio’s carbon footprint, at which point your organisation might outsource this analysis to an emissions analyst for the additional expertise. Your organisation might also have certain aspects such as outsourcing of data from external data providers in order to perform research and analysis themselves.  This indicator allows you to describe how you ensure consistency throughout your services in terms of ESG/RI beliefs and adherence to any formalized policies on ESG/RI that you might have.  To find out more on how your peers have responded on this practice, view our analysis and visualisation in the [service provider interactive snapshot report](https://app.powerbi.com/view?r=eyJrIjoiMGNlMTcyYzYtODI2MC00YjcwLTg2YjAtMDNmNTc5ZmNhYThjIiwidCI6ImZiYzI1NzBkLWE5OGYtNDFmMS1hOGFkLTEyYjEzMWJkOTNlOCIsImMiOjh9) available on the Data Portal and the PRI website. |
| **LOGIC** | |
| **SG 05.1** | If you report that any percentage >0% of your services are outsourced, SG 05.2 and 05.3 will be applicable to you. |

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|  | Indicator status | Purpose  DESCRIPTIVE |
| SG 06 | MANDATORY |

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| SG 06 | INDICATOR |
| **SG 06.1** | Indicate whether you provide training/educational services on ESG/RI. Tick all that apply. |
| ❑ Board/trustee training  ❑ Investment manager training  ❑ Regulatory bodies/authorities or public policy makers  ❑ Corporate executive training  ❑ ESG analyst training  ❑ Other, specify (1)\_\_\_\_  ❑ Other, specify (2)\_\_\_\_  ❑ Other, specify (3)\_\_\_\_  ❑ Other, specify (4)\_\_\_\_  🔾 None of the above |
| **SG 06.2** | Describe the main components of your training/educational services on ESG/RI and any variations depending on the group you provide training/education to. |
|  |
| **SG 06.3** | Describe whether these training/educational services include any commercial elements. |
|  |
| **SG 06.4** | Additional information  [OPTIONAL] |
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| SG 06 | **EXPLANATORY NOTES** |
| SG 06.3 | Use this indicator to describe to what extent you include information about your other service offerings as part of the training/educational sessions. |
| LOGIC | |
| **SG 06.1** | SG 06.2 and SG 06.3 will be applicable if you reported that you provide training/educational services to any of the groups listed in SG 06.1, including ‘Other, specify’. |

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|  | Indicator status | Purpose  DESCRIPTIVE |
| SG 07 | MANDATORY |

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| SG 07 | INDICATOR |
| **SG 07.1** | Describe how your organisation applies, advances and promotes the PRI Principles. |
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| **SG 07.2** | Highlight whether there are any ways that your organisation would like to engage further with the PRI.  [OPTIONAL] |
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| SG 07 | **EXPLANATORY NOTES** |
| **SG 07** | Use this indicator to describe where you are specifically promoting the PRI Principles through your work and other activities. You may list the specific events, publications, and other actions you undertook during the reporting year to explicitly apply, advance, and promote the PRI Principles. Advancement of general RI and ESG practices can be described in the subsequent indicator. |

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|  | Indicator status | Purpose |
| SG 08 | MANDATORY |  |

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| SG 08 | INDICATOR |
| **SG 08.1** | Indicate which of the following actions your organisation has taken to promote responsible investments during the reporting year, independently of collaborative initiatives. |
| ❑ Provided or supported education or training programmes for clients, investment managers,  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  ❑ Spoken publicly at events and conferences to promote responsible investment  ❑ Written and published in-house research papers on responsible investment  ❑ Encouraged the adoption of the PRI  ❑ Written and published articles on responsible investment in the media  ❑ Policy engagements and other interactions  ❑ Other, specify\_\_\_\_\_\_\_\_\_  🔾 None of the above |
| **SG 08.2** | Additional information.  [Optional] |
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| SG 08 | **EXPLANATORY NOTES** |
| **SG 08** | Describe any activities that help contribute to the wider understanding of RI or ESG issues, including pro bono work, training or thought leadership activities that your organisation undertakes. |

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|  | Indicator status | Purpose  DESCRIPTIVE |
| SG 09 | MANDATORY |

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| SG 09 | INDICATOR |
| **SG 09.1** | Indicate which of the following long-term trends are addressed in your product outputs. |
| * Changing demographics * Climate change * Resource scarcity * Technology developments * Other, specify (1)\_\_\_\_ * Other, specify (2) \_\_\_\_   🔾 None of the above |
| **SG 09.2** | Explain how this long-term trend affects your product outputs. |
|  |
| **SG 09.3** | If none of the above are applicable, please explain why not. |
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| SG 09 | **EXPLANATORY NOTES** |
| **SG 09.1** | This indicator gives you the opportunity to report on long term ESG trends that your organisation is considering as part of your overall approach to ESG and/or responsible investment. The list of trends is not exhaustive, and it is expected that signatories will provide examples of additional trends that are not currently captured. PRI will continue to monitor and update the list in future years. |
| **SG 09.2** | The terms used are broad and may impact business and investment processes in a number of different ways. Please provide detail on how these trends will impact your approach in terms of your product outputs. |
| **LOGIC** | |
| **SG 09.1** | SG 09.2 will be applicable if you report that you address any of the long-term trends in your product outputs, this includes ‘Other, specify\_\_\_’.  SG 09.3 will be applicable if you report ‘None of the above’. |

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|  | Indicator status | Purpose |
| SG 10 | MANDATORY |

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| SG 10 | INDICATOR | |
| SG 10.1 | Indicate whether you interact with asset owner clients. | |
| 🔾 Yes, we do | 🔾 No, we do not |
| **SG 10.2** | Indicate the typical frequency and type of interactions with your asset owner clients. | |
| Type of interaction | Frequency |
| ❑ Board of trustee meetings | [DROPDOWN]  Daily, Weekly, Monthly, Quarterly, Bi-annually, Annually, Ad-hoc basis, Other, specify (1)\_\_\_\_, |
| ❑ Investment committee meetings | [same as above] |
| ❑ Trustee training workshops |  |
| ❑ Formal regular meetings outside of committee meetings |  |
| ❑ Informal meetings or calls |  |
| ❑ Other, specify (1) \_\_\_\_\_ |  |
| ❑ Other, specify (2) ­­­­\_\_\_\_\_ |  |
| ❑ Other, specify (3) \_\_\_\_\_ |  |
| **SG 10.3** | Additional information  [OPTIONAL] | |
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| SG 10 | **EXPLANATORY NOTES** |
| **SG 10** | This indicator is asking about your typical interactions with asset owner clients, not the investment managers you might be researching for your clients.  This indicator will in part help PRI understand the relationship between service providers and their asset owner clients, the intensity of that relationship and they type of interaction they have to ensure clients are well informed of their services.  Investor client interactions, frequency and topics may sometimes vary. Please report your typical approach.  ‘Interaction’ is taken to mean meetings or calls where substantive issues are discussed. It does not mean monitoring items such as reporting.  To find out more on how your peers have responded on this practice, view our analysis and visualisation in the [service provider interactive snapshot report](https://app.powerbi.com/view?r=eyJrIjoiMGNlMTcyYzYtODI2MC00YjcwLTg2YjAtMDNmNTc5ZmNhYThjIiwidCI6ImZiYzI1NzBkLWE5OGYtNDFmMS1hOGFkLTEyYjEzMWJkOTNlOCIsImMiOjh9) available on the Data Portal and the PRI website. |
| **SG 10.2** | The information you report here is understood as the typical approach to a type of interaction and frequency of that interaction. Some level of generalization and aggregation of information may be needed to respond to this indicator. |
| **SG 10.3** | You may wish to describe the subject areas that you address in your interactions with asset owner clients. These may include, but are not limited to: RI-policy incorporation, how ESG affects the investment strategy, ESG integration, how ESG affects valuations, engagement and (proxy) voting, conflicts of interest, ESG risks, research on RI topics, ESG ratings, etc. |
| **LOGIC** | |
| **SG 10.2** | SG 10.2 will be applicable if you report ‘Yes, we do’ in SG 10.1 |

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|  | Indicator status | Purpose  DESCRIPTIVE |
| SG 11 | MANDATORY |

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| SG 11 | INDICATOR |
| **SG 11.1** | Describe how you typically align your organisation’s philosophy and approach to ESG/RI with your investor clients’ goals. |
| 🔾 This is not relevant for my organisation |
| **SG 11.2** | Additional information.  [Optional] |
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| SG 11 | **EXPLANATORY NOTES** |
| **SG 11** | This indicator allows you to elaborate on how your organisation adapts its approach and execution of ESG services according to the investment goals or other needs of investor clients.  Investor goals may be general such as generating superior, risk-adjusted returns or being an active owner, channelling capital towards positive impact investment opportunities and/or contributing to the sustainability of the financial markets.  Actions to align your organisation’s philosophy on and approach to ESG with investor goals may include, but are not limited to: compiling an RI/ESG value or belief statement, setting RI outcomes to be achieved over time, setting timelines for RI outcomes, documenting RI outcomes, timelines and guidelines, and RI/ESG training when beliefs and outcomes diverge.  If this indicator is not applicable to your organisation, please explain why not by using the ‘Additional information’ box. |

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|  | Indicator status | Purpose |
| SG 12 | MANDATORY | DESCRIPTIVE |

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| SG 12 | INDICATOR |
| **SG 12.1** | Describe what steps you take, if any, when your ESG recommendations are not in line with your investor clients’ goals. |
| 🔾 This is not relevant for my organisation |
| **SG 12.2** | Additional information.  [Optional] |
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| SG 12 | **EXPLANATORY NOTES** |
| **SG 12.1** | Describe if you take any actions to re-align your ESG recommendations with your client’s goals, either by modifying your approach or by providing the investor with further information to assist with decision making.  If this indicator is not applicable for your organisation, please explain why not by using the ‘Additional information’ box. |

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|  | Indicator status | Purpose |
| SG 13 | MANDATORY | DESCRIPTIVE |

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| SG 13 | INDICATOR | |
| **SG 13.1** | Indicate whether you seek feedback from clients on your RI/ESG services and product offerings. | |
|  | 🔾 Yes | 🔾 No |
| **SG 13.2** | Describe how you use this feedback in your RI/ESG services and product offerings. | |
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| **SG 13.3** | If not, please explain why. | |
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| SG 13 | **EXPLANATORY NOTES** |
| **SG 13** | It may be possible to ask clients to comment on the utility of the work carried out for them, in order to understand and potentially make changes to product and service offerings. This might not always be possible or appropriate in the client relationship. |
| **LOGIC** | |
| **SG 13.1** | SG 13.2 will be applicable if you report ‘Yes’.  SG 13.3 will be applicable if you report ‘No’. |

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|  | Indicator status | Purpose |
| SG 14 | MANDATORY | DESCRIPTIVE |

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| SG 14 | INDICATOR | |
| **SG 14.1** | Indicate whether your organisation has a policy for managing potential conflicts of interest. | |
|  | 🔾 Yes | 🔾 No |
| **SG 14.2** | Describe how you manage potential conflicts of interest. | |
|  |  | |
| **SG 14.3** | Describe how you ensure that company employees do not derive any personal gain from the use of information collected during your work process. | |
|  | |
| **SG 14.4** | Additional information  [OPTIONAL] | |
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| SG 14 | **EXPLANATORY NOTES** |
| **SG 14** | A conflict of interest may occur where the interest of a client is not the same as, or is not perceived to be the same as, that of your own organisation. |
| **LOGIC** | |
| **SG 14.1** | SG 14.2 and 14.3 will be applicable if you report ‘Yes’ in SG 14.1. |