



| LEA 02                                 | Disclosures: Mandatory | Reason for Interaction   | Principle: PRI 1, 2, 3 |
|--|------------------------|--|------------------------|
| Individual/ internal staff engagements |                        | <input checked="" type="checkbox"/> To support investment decision-making in a company's material ESG issues<br><input checked="" type="checkbox"/> To influence corporate transition or identify the need for a transition<br><input checked="" type="checkbox"/> To engage internal ESG expertise<br><input type="checkbox"/> Other: specify |                        |
| Collaborative engagements              |                        | <input type="checkbox"/> To support investment decision-making in a company's material ESG issues<br><input type="checkbox"/> To influence corporate transition or identify the need for a transition<br><input type="checkbox"/> Other: specify   |                        |
| Service provider engagements           |                        | <input type="checkbox"/> To support investment decision-making in a company's material ESG issues<br><input type="checkbox"/> To influence corporate transition or identify the need for a transition<br><input type="checkbox"/> Other: specify   |                        |

# RI TRANSPARENCY REPORT

## 2014/15

FIM Asset Management

## 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                 | ✓      | Private                      |           |   |   |   |   |   | ✓       |
| OO 08                   | Breakdown of AUM by market                          | ✓      | Private                      |           |   |   |   |   |   | ✓       |
| OO 09                   | Additional information about organisation           | -      | n/a                          |           |   |   |   |   |   | ✓       |
| 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   | ✓      | Private    |           |   |   |   |   |   | ✓       |
| OA 10                | Collaborative organisations / initiatives                          | ✓      | Public     |           |   |   | ✓ | ✓ |   |         |
| OA 11                | Promoting RI independently   | ✓      | Public     |           |   |   | ✓ |   |   |         |
| OA 12                | Dialogue with public policy makers or standard setters             | ✓      | Private    |           |   |   | ✓ | ✓ | ✓ |         |
| OA 13                | ESG issues in strategic asset allocation                           | ✓      | Private    | ✓         |   |   |   |   |   |         |
| OA 14                | Allocation of assets to environmental and social themed areas      | ✓      | Private    | ✓         |   |   |   |   |   |         |
| 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                              | ✓      | Private    |           |   |   |   |   |   | ✓       |
| OA 19                | Internal and external review and assurance of responses            | ✓      | Private    |           |   |   |   |   |   | ✓       |

| 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         | ✓      | Private    | ✓         |   |   |   |   |   |         |
| 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                                 | ✓      | Private    | ✓         |   |   |   |   |   |         |
| LEI 05                               | Information from engagement and/or voting used in investment decision-making        | ✓      | Private    | ✓         |   |   |   |   |   |         |
| 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                                  | ✓      | Private    | ✓         |   |   |   |   |   |         |
| LEI 09                               | Types of sustainability thematic funds/mandates                                     | ✓      | Public     | ✓         |   |   |   |   |   |         |
| LEI 10                               | Description of ESG integration  | -      | n/a        | ✓         |   |   |   |   |   |         |
| LEI 11                               | Review ESG issues while researching companies/sectors                               | ✓      | Public     | ✓         |   |   |   |   |   |         |
| LEI 12                               | Processes to ensure integration is based on robust analysis                         | ✓      | Private    | ✓         |   |   |   |   |   |         |
| LEI 13                               | Aspects of analysis ESG information is integrated into                              | ✓      | Private    | ✓         |   |   |   |   |   |         |
| LEI 14                               | ESG issues in index construction  | 🔒      | n/a        | ✓         |   |   |   |   |   |         |
| LEI 15                               | How ESG incorporation has influenced portfolio composition                          | -      | n/a        | ✓         |   |   |   |   |   |         |
| LEI 16                               | Incorporation of ESG issues has improved financial/ESG performance and reduced risk | ✓      | Private    | ✓         |   |   |   |   |   |         |
| LEI 17                               | Examples of ESG issues that affected your investment view / performance             | ✓      | Private    | ✓         |   |   |   |   |   |         |
| 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  | ✓      | Private    |           | ✓ |   |   |   |   |         |
| LEA 02                                  | Reasoning for interaction on ESG issues                                      | ✓      | Public     | ✓         | ✓ | ✓ |   |   |   |         |
| LEA 03                                  | Process for identifying and prioritising engagement activities               | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA 04                                  | Objectives for engagement activities   | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA 05                                  | Process for identifying and prioritising engagement activities               | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA 06                                  | Objectives for engagement activities   | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA 07                                  | Role in engagement process   | ✓      | Public     |           | ✓ |   | ✓ |   |   |         |
| LEA 08                                  | Monitor / discuss service provider information                               | ✓      | Public     |           | ✓ |   |   |   | ✓ |         |
| LEA 09                                  | Share insights from engagements with internal/external managers              | ✓      | Private    | ✓         | ✓ |   |   |   |   |         |
| LEA 10                                  | Tracking number of engagements   | ✓      | Public     |           | ✓ |   |   |   |   |         |
| LEA 11                                  | Number of companies engaged with, intensity of engagement and effort         | ✓      | Private    |           | ✓ |   |   |   |   |         |
| LEA 12                                  | Engagements on E, S and/or G issues  | ✓      | Private    |           | ✓ |   |   |   |   |         |
| LEA 13                                  | Companies changing practices / behaviour following engagement                | ✓      | Private    |           | ✓ |   |   |   |   |         |
| LEA 14                                  | Examples of ESG engagements  | ✓      | Public     |           | ✓ |   |   |   |   |         |
| LEA 15                                  | Disclosure of approach to ESG engagements                                    | ✓      | Public     |           | ✓ |   |   |   | ✓ |         |
| LEA 16                                  | Description of approach to (proxy) voting                                    | ✓      | Private    |           | ✓ |   |   |   |   |         |
| LEA 17                                  | Typical approach to (proxy) voting decisions                                 | ✓      | Public     |           | ✓ |   |   |   |   |         |
| LEA 18                                  | Percentage of voting recommendations reviewed                                | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA 19                                  | Confirmation of votes  | ✓      | Private    |           | ✓ |   |   |   |   |         |
| LEA 20                                  | Securities lending programme   | ✓      | Private    |           | ✓ |   |   |   |   |         |
| 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                 | ✓      | Private    |           | ✓ |   |   |   |   |         |
| LEA 24                                  | Shareholder resolutions  | ✓      | Private    |           | ✓ |   |   |   |   |         |
| LEA 25                                  | Examples of (proxy) voting activities  | ✓      | Private    |           | ✓ |   |   |   |   |         |
| LEA 26                                  | Disclosing voting activities   | ✓      | Public     |           | ✓ |   |   |   | ✓ |         |

# FIM Asset Management

## Reported Information

## Public version

## Organisational Overview

## PRI disclaimer

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## Basic Information

OO 01

Mandatory

Gateway/Peering

General

OO 01.1

Select the services you offer.

Fund management

% of assets under management (AUM) in ranges

- <10%
- 10-50%
- >50%

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

% of assets under management (AUM) in ranges

- <10%
- 10-50%
- >50%

Other, specify

Execution and advisory services

OO 02

Mandatory

Peering

General

OO 02.1

Select the location of your organisation's headquarters.

Finland

OO 02.2

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

- 1
- 2-5
- 6-10
- >10

OO 02.3

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

FTE

140

OO 03

Mandatory

Descriptive

General



OO 03.1

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

- Yes
- No

OO 04

Mandatory

Gateway/Peering

General

OO 04.1

Indicate the year end date for your reporting year.

31/12/2014

OO 04.2

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

|               | trillions | billions | millions | thousands | hundreds |
|---------------|-----------|----------|----------|-----------|----------|
| Total AUM     |           | 5        | 506      | 000       | 000      |
| Currency      | EUR       |          |          |           |          |
| Assets in USD |           | 7        | 221      | 070       | 413      |

OO 04.5

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

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

OO 06

Mandatory

Descriptive

General

OO 06.1

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

- Publish our asset class mix as broad ranges

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

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

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

### Gateway asset class implementation indicators

|       |           |         |         |
|-------|-----------|---------|---------|
| OO 10 | Mandatory | Gateway | General |
|-------|-----------|---------|---------|

**OO 10.1**

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

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

|       |           |         |         |
|-------|-----------|---------|---------|
| OO 11 | Mandatory | Gateway | General |
|-------|-----------|---------|---------|

**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
- Property
- None of the above

**OO 11.2**

Indicate if in the reporting year you addressed ESG incorporation and/or active ownership in your external manager selection, appointment and/or monitoring processes in the following externally managed asset classes.

- Fixed income – corporate
- Hedge funds
- 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 - Government

**Closing module**

- Closing module

# FIM Asset Management

## Reported Information

### Public version

### Overarching Approach

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## Responsible investment policy

|       |           |                       |         |
|-------|-----------|-----------------------|---------|
| OA 01 | Mandatory | Gateway/Core Assessed | General |
|-------|-----------|-----------------------|---------|

**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 approach is based on active ownership (engagements, very limited AGM voting). An external service provider, GES Investment Services, screens all our holdings twice a year and we conduct engagement processes with them. We are a founding member of FINSIF and a signatory of CDP and WDP. Four of our funds (FIM Brands, FIM Brazil, FIM BRIC+, FIM Sahara) exclude companies involved in tobacco, pornography and certain weapon technologies (nuclear and cluster weapons, anti-personnel mines).

|       |           |               |       |
|-------|-----------|---------------|-------|
| OA 02 | Mandatory | Core Assessed | PRI 6 |
|-------|-----------|---------------|-------|

**OA 02.1** Indicate if your responsible investment policy is publicly available.

- Yes

**OA 02.2** Provide a URL to your responsible investment policy.

URL

[https://www.fim.com/about-fim/vastuullisuus/sijoittaminen?sc\\_lang=en](https://www.fim.com/about-fim/vastuullisuus/sijoittaminen?sc_lang=en)

- No

|       |           |               |         |
|-------|-----------|---------------|---------|
| 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<br><input checked="" type="checkbox"/> (Proxy) voting policy<br><input checked="" type="checkbox"/> Engagement/active ownership policy<br><input type="checkbox"/> Specific guidelines on corporate governance<br><input type="checkbox"/> Specific guidelines on environmental issues<br><input type="checkbox"/> Specific guidelines on social issues<br><input type="checkbox"/> Asset class-specific guidelines<br><input checked="" type="checkbox"/> Screening/exclusion policy<br><input type="checkbox"/> Other, specify<br><input type="checkbox"/> Other, specify | <input checked="" type="radio"/> Applicable policies cover all AUM<br><input type="radio"/> Applicable policies cover a majority of AUM<br><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]

Sector based negative screening applies only to four funds (FIM Sahara, FIM Brazil, FIM BRIC+ and FIM Brands).

|              |                  |                      |                |
|--------------|------------------|----------------------|----------------|
| <b>OA 04</b> | <b>Mandatory</b> | <b>Core Assessed</b> | <b>General</b> |
|--------------|------------------|----------------------|----------------|

**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]

We have two conflict of interest prevention policies: general policy is on FIM Group level and a complementary policy is related to our mutual fund activities.

The general policy addresses the following issues: 1 Conflicts of interest in offering investment services and mutual funds 2 Asset management, transmission of orders, and trading on own account 3 Mutual fund activity 4 Investment research 5 Personal business transactions 6 Compensation schemes and incentives 7 Secondary occupations of management and personnel members 8 Duty to disclose conflicts of interest.

The complementary policy related to mutual fund activities defines the possible circumstances in mutual fund activity in which a conflict of interest may arise involving a significant risk directed at the interests of a mutual fund, non-UCITS fund, or one or more customers. It also sets the procedures to prevent and manage conflicts of interest: separation of operations, separate information systems, restricted user permissions, and access control.

No

## Objectives and strategies

|              |                  |                              |                |
|--------------|------------------|------------------------------|----------------|
| <b>OA 05</b> | <b>Mandatory</b> | <b>Gateway/Core Assessed</b> | <b>General</b> |
|--------------|------------------|------------------------------|----------------|

**OA 05.1**

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

Yes

No

## Governance and human resources

**OA 07**

Voluntary

Descriptive

General

**OA 07.1**

Provide a brief description of your organisation's governance, management structures and processes related to responsible investment.

One of our fund managers has been appointed to govern issues related to responsible investments. He manages the screening and engagement processes with our external service provider, GES Investment Services and our activities at FINSIF. He works with our CIO, who has the final decision power related to individual cases. Changes to our investment policy are approved by our Board of Directors.

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

**OA 08**

Mandatory

Gateway/Core Assessed

General

**OA 08.1**

Indicate the roles present in your organisation and for each, indicate whether they have oversight and/or implementation responsibilities for responsible investment.

**Roles present in your organisation**

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

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

Number

1

**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
- Asian Corporate Governance Association
- 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
- CDP Forests
- CDP Water

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

- Basic
- Moderate
- Advanced
- CFA Institute Centre for Financial Market Integrity
- Council of Institutional Investors (CII)
- Eumedion
- Extractive Industries Transparency Initiative (EITI)
- 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)
- Investor Group on Climate Change, Australia/New Zealand (IGCC)
- Investor Network on Climate Risk (INCR)/CERES
- Local Authority Pension Fund Forum
- Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify
- Shareholder Association for Research and Education (Share)
- United Nations Environmental Program Finance Initiative (UNEP FI)
- United Nations Global Compact
- Other collaborative organisation/initiative, specify

FINSIF

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

- Basic
- Moderate
- Advanced
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify

OA 11

Mandatory

Core Assessed

PRI 4

OA 11.1

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

- Yes

OA 11.2

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

- Provided or supported education or training programmes for clients, investment managers, broker/dealers, investment consultants, legal advisers or other investment organisations
  - Provided financial support for academic or industry research on responsible investment
  - Encouraged better transparency and disclosure of responsible investment practices across the investment industry
  - Spoke publicly at events and conferences to promote responsible investment
  - Wrote and published in-house research papers on responsible investment
  - Encouraged the adoption of the PRI
  - Other, specify
- No

# FIM Asset Management

## Reported Information

### Public version

#### Direct - Listed Equity Incorporation

## PRI disclaimer

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## Overview

|        |           |             |       |
|--------|-----------|-------------|-------|
| LEI 02 | Voluntary | Descriptive | PRI 1 |
|--------|-----------|-------------|-------|

**LEI 02.1** Provide a brief overview of how you incorporate ESG issues into listed equity investments.

Our partner GES Investment Services reviews the holdings of all FIM Funds twice a year (norms-based screening). If any violations come into light, GES helps us to find out the backstory and begin discussions and an engagement process with the company to rectify the situation.

Additionally four of our funds where customers have specifically requested that certain investments were excluded from the funds' investment universe apply negative screening. Thus the FIM Brands, FIM Brazil, FIM BRIC+ and FIM Sahara funds do not invest in companies in the tobacco or pornographic industries or in companies operating in certain sectors of weapons technology (nuclear and cluster weapons and anti-personnel landmines).

Thematic investing: FIM Rohto Biomed Fund invests globally in companies operating in the healthcare sector. Key investment targets include pharmaceutical and biotechnology companies and companies that produce healthcare equipment and services.

## ESG incorporation in actively managed listed equities

### Implementation processes

|        |           |                       |       |
|--------|-----------|-----------------------|-------|
| LEI 03 | Mandatory | Gateway/Core Assessed | PRI 1 |
|--------|-----------|-----------------------|-------|

**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%) |    |
|  | 98 |

- Thematic alone (i.e. not combined with any other strategies)
- Integration alone (i.e. not combined with any other strategies)
- Screening + Integration strategies
- Thematic + integration strategies

|  |   |
|--|---|
| Percentage of active listed equity to which the strategy is applied - you may (estimate +/- 10%) | % |
|  | 2 |

- Screening + thematic strategies
- All three strategies combined
- No incorporation strategies applied

|  |  |
|--|--|
|  | Total actively managed listed equities |
|--|--|

100%

|                 |   |
|-----------------|---|
| <b>LEI 03.2</b> | Describe your primary reasons for choosing a particular ESG incorporation strategy. |
|-----------------|---|

FIM Funds have positions in appr. 700 companies globally with significant weight on emerging markets. Norms-based screening allows us to track all our holdings regarding ESG factors. External service provider gives us expertise on ESG issues and allows us to combine forces with their other customers in engagements. Negative screening is based on our customers' specific requests to comply with their ESG policies.

|                 |  |
|-----------------|--|
| <b>LEI 03.3</b> | Where assets are managed using a combination of ESG incorporation strategies, briefly describe how these combinations are used. [Optional] |
|-----------------|--|

FIM Rohto Biomed is subject to the same norms-based screening as all other funds.

|                                      |
|--------------------------------------|
| <b>(A) Implementation: Screening</b> |
|--------------------------------------|

|               |                  |                    |              |
|---------------|------------------|--------------------|--------------|
| <b>LEI 06</b> | <b>Mandatory</b> | <b>Descriptive</b> | <b>PRI 1</b> |
|---------------|------------------|--------------------|--------------|

|                 |  |
|-----------------|--|
| <b>LEI 06.1</b> | Indicate and describe the type of screening you apply to your internally managed active listed equities. |
|-----------------|--|

**Type of screening**

- Negative/exclusionary screening

**Screened by**

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

| Description |
|-------------|
|-------------|

FIM Brands, FIM Brazil, FIM BRIC+ and FIM Sahara funds (4 of our 28 funds) do not invest in companies in the tobacco or pornographic industries or in companies operating in certain sectors of weapons technology (nuclear and cluster weapons and anti-personnel landmines).

- Positive/best-in-class screening
- Norms-based screening

**Screened by**

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

| Description |
|-------------|
|-------------|

Screening is based on GES Global Ethical Standard.

| 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. |
|----------|---|
|----------|---|

Negative screening is based on customers' request to comply with their ESG policy. The changes to our screening criteria are communicated on our website and marketing material.

| LEI 07 | Mandatory | Core Assessed | PRI 1 |
|--------|-----------|---------------|-------|
|--------|-----------|---------------|-------|

| LEI 07.1 | Indicate which processes your organisation uses to ensure that screening is based on robust analysis. |
|----------|---|
|----------|---|

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

| (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.   |
|          | <input type="checkbox"/> Environmentally themed funds<br><input checked="" type="checkbox"/> Socially themed funds<br><input type="checkbox"/> Combination of themes |
| LEI 09.2 | Describe your organisation's processes for sustainability themed funds. [Optional]   |

FIM Rohto Biomed Fund invests globally in companies operating in the healthcare sector. Key investment targets include pharmaceutical and biotechnology companies and companies that produce healthcare equipment and services.

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

|        |           |               |       |
|--------|-----------|---------------|-------|
| LEI 11 | Mandatory | Core Assessed | PRI 1 |
|--------|-----------|---------------|-------|

|          |   |
|----------|---|
| LEI 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 type="radio"/> We systematically review the potential significance of environmental issues and investigate them accordingly<br><input checked="" type="radio"/> We occasionally review the potential significance of environmental issues and investigate them accordingly<br><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<br><input checked="" type="radio"/> We occasionally review the potential significance of social issues and investigate them accordingly<br><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<br><input checked="" type="radio"/> We occasionally review the potential significance of corporate governance issues and investigate them accordingly<br><input type="radio"/> We do not review corporate governance issues |

### Communication

|        |           |               |         |
|--------|-----------|---------------|---------|
| LEI 18 | Mandatory | Core Assessed | PRI 2,6 |
|--------|-----------|---------------|---------|

**LEI 18.1**

Indicate if your organisation proactively discloses information on your approach to ESG incorporation in listed equity.

- We disclose it publicly

Provide URL

[https://www.fim.com/about-fim/vastuullisuus/sijoittaminen?sc\\_lang=en](https://www.fim.com/about-fim/vastuullisuus/sijoittaminen?sc_lang=en)

**LEI 18.2**

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

- Yes

**LEI 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

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



# FIM Asset Management

## Reported Information

### Public version

#### Direct - Listed Equity Active Ownership

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## Engagement

### Overview

|        |           |         |           |
|--------|-----------|---------|-----------|
| 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 type="checkbox"/> To support investment decision-making (e.g. company research)<br><input type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues<br><input type="checkbox"/> To encourage improved ESG disclosure<br><input type="checkbox"/> Other, specify<br><input checked="" 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)<br><input type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues<br><input type="checkbox"/> To encourage improved ESG disclosure<br><input type="checkbox"/> Other, specify<br><input checked="" type="checkbox"/> We do not engage via collaborative engagements    |
| <b>Service provider engagements</b>          | <input checked="" type="checkbox"/> To support investment decision-making (e.g. company research)<br><input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues<br><input type="checkbox"/> To encourage improved ESG disclosure<br><input type="checkbox"/> Other, specify<br><input type="checkbox"/> We do not engage via service providers |

|          |                                    |
|----------|------------------------------------|
| LEA 02.2 | Additional information. [Optional] |
|----------|------------------------------------|

Our fund managers participate in engagements carried out by our external service provider, but we don't carry out engagements solely by internal staff.

## Process

### Process for engagements conducted with/on your behalf by service providers

|        |           |               |         |
|--------|-----------|---------------|---------|
| LEA 07 | Mandatory | Core Assessed | PRI 2,4 |
|--------|-----------|---------------|---------|

**LEA 07.1** Indicate if you play a role in the engagement process that your service provider conducts on your behalf.

Yes

**LEA 07.2** Indicate what role you play in engagements that your service provider conducts on your behalf.

- Specify the issues for the engagement
- Specify the objectives for the engagement
- Select the companies to be engaged with
- Participate directly in the engagements with your service provider
- Actively monitor and review the activities of the service provider
- Other, specify

No

**LEA 08**

**Mandatory**

**Core Assessed**

**PRI 2,6**

**LEA 08.1** Indicate whether you monitor and/or discuss the following information provided to you by your service provider

**Please select all that apply**

- The subject (or ESG issue(s)) of engagement
- The objectives of the engagement
- The rationale for engagement
- The frequency/intensity of interactions with companies
- Progress towards achieving engagement goals
- Outcomes that have been achieved from the engagement
- Next steps for engagement activity
- Other, specify
- None of the above

### General processes for all three groups of engagers

**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>Service provider engagements</b> | <input type="radio"/> Yes, we track the number of our engagements in full<br><input checked="" type="radio"/> Yes, we partially track the number of our engagements<br><input type="radio"/> No, we do not track our engagements but can provide a reasonable estimate of our engagement numbers<br><input type="radio"/> No, we do not track and cannot estimate our engagements |

**LEA 10.2** Additional information. [Optional]

We know the precise number of company specific engagements our service provider is carrying out for us, but the service provider has additionally some theme or country based engagements which target larger number of companies.

## Outputs and outcomes

|               |                  |                    |              |
|---------------|------------------|--------------------|--------------|
| <b>LEA 14</b> | <b>Voluntary</b> | <b>Descriptive</b> | <b>PRI 2</b> |
|---------------|------------------|--------------------|--------------|

**LEA 14.1** Provide examples of the engagements that your organisation carried out during the reporting year.

Add Example 1

|                    |   |
|--------------------|---|
| Topic or ESG issue | Funding dam construction in Ethiopia. The construction leads to environmental damage and relocation of communities.   |
| Conducted by       | <input checked="" type="checkbox"/> Service provider  |
| Objectives         | To halt funding the project.  |
| Scope and Process  | The service provider has been in active dialogue with the bank. The bank states that the benefits of the project outweigh the adverse effects. The bank states that it conducts environmental assessment of its financing projects. |
| Outcomes           | The bank has not withdrawn its funding.   |

Add Example 2

|                    |   |
|--------------------|---|
| Topic or ESG issue | Numerous oil spills. Avoiding enforcement of court ordered fines.   |
| Conducted by       | <input checked="" type="checkbox"/> Service provider  |
| Objectives         | Secure financing of clean-up operations.  |
| Scope and Process  | The oil spills took place 20-40 years ago in Ecuador. The oil company conducted clean-up operations in 1995 and was released from further liability. Despite this legal process led to significant fines. A recent court ruling gave immunity from enforcement in the US. The service provider has been in contact with parties involved. |
| Outcomes           | The oil company states that it is no longer responsible of the remaining  |

- Add Example 3
- Add Example 4
- Add Example 5
- Add Example 6
- Add Example 7
- Add Example 8
- Add Example 9
- Add Example 10

## Communication

LEA 15

Mandatory

Core Assessed

PRI 2,6

LEA 15.1

Indicate whether your organisation proactively discloses information on its engagements.

We disclose it publicly

provide URL

[https://www.fim.com/about-fim/vastuullisuus/sijoittaminen?sc\\_lang=en](https://www.fim.com/about-fim/vastuullisuus/sijoittaminen?sc_lang=en)

**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

Examples of engagements are disclosed on our website and marketing material

**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

|                 |  |
|-----------------|--|
| <b>LEA 15.6</b> | Indicate how frequently you typically report engagements information to clients/beneficiaries. |
|-----------------|--|

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

**(Proxy) voting and shareholder resolutions**

**Process**

|               |                  |                    |              |
|---------------|------------------|--------------------|--------------|
| <b>LEA 17</b> | <b>Mandatory</b> | <b>Descriptive</b> | <b>PRI 2</b> |
|---------------|------------------|--------------------|--------------|

|                 |   |
|-----------------|---|
| <b>LEA 17.1</b> | 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.

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

- our own voting policy
  - our clients requests or policy
  - other, explain
- We hire service provider(s) which make voting recommendations or provide research that we use to inform our voting decisions.
- We hire service provider(s) which make voting decisions on our behalf, except for some pre-defined scenarios for which we review and make voting decisions.
- We hire service provider(s) which make voting decisions on our behalf.

|               |                  |                      |              |
|---------------|------------------|----------------------|--------------|
| <b>LEA 21</b> | <b>Mandatory</b> | <b>Core Assessed</b> | <b>PRI 2</b> |
|---------------|------------------|----------------------|--------------|

|                 |   |
|-----------------|---|
| <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:
- No
- Not applicable as we and/or our service providers do not abstain or vote against management recommendations

|          |                                    |
|----------|------------------------------------|
| LEA 21.2 | Additional information. [Optional] |
|----------|------------------------------------|

We discuss the issue while meeting the management/main owners.

## Outputs and outcomes

|        |           |               |       |
|--------|-----------|---------------|-------|
| LEA 22 | Mandatory | Core Assessed | PRI 2 |
|--------|-----------|---------------|-------|

|          |   |
|----------|---|
| LEA 22.1 | For listed equities where you and/or your service provider has the mandate to issue (proxy) voting instructions, indicate the percentage of votes cast during the reporting year. |
|----------|---|

We do track or collect this information

|  |                                |
|--|--------------------------------|
|  | Votes cast (to the nearest 1%) |
|--|--------------------------------|

|  |   |
|--|---|
|  | % |
|--|---|

1

|  |  |
|--|--|
|  | 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

## Communication

|        |           |               |         |
|--------|-----------|---------------|---------|
| LEA 26 | Mandatory | Core Assessed | PRI 2,6 |
|--------|-----------|---------------|---------|

|          |  |
|----------|--|
| LEA 26.1 | Indicate if your organisation proactively discloses information on your voting activities. |
|----------|--|

- We disclose it publicly
- We disclose it to clients/beneficiaries only
- We do not proactively disclose our voting activities to the public and/or to clients/beneficiaries