PRI Principles for Responsible Investment

# RI TRANSPARENCY REPORT

# 2013/14

## Carnegie Asset Management

UNEP Finance Initiative Changing finance, financing change | United Nations Global Compact

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

# About this report

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

This report is an export of the individual Signatory organisation's response to the PRI during the 2013-14 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. This results in some Principles not being explicitly highlighted. For instance, Principle 1 and 2 cannot be implemented without implementing Principle 3, but there are cases when Principle 3 is not explicitly 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.

## PRI disclaimer

This document is based on information reported by signatories and responses have not been independently audited by the PRI Secretariat, PRI working groups, or any other third party. While this information is believed to be reliable, no representations or warranties are made as to its accuracy and no responsibility or liability can be accepted for any error or omission.



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# 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 | ✓ | n/a | | | | | | | ✓ |
| OO 06 | How would you like to disclose your asset class mix | ✓ | Public | | | | | | | ✓ |
| OO 07 | Segregated mandates or pooled funds | 🔒 | n/a | | | | | | | ✓ |
| OO 08 | Breakdown of AUM by market | ✓ | Public | | | | | | | ✓ |
| OO 09 | Additional information about organisation | ✓ | Private | | | | | | | ✓ |
| OO 10 | RI activities for listed equities | ✓ | Public | | | | | | | ✓ |
| OO 11 | RI activities in other asset classes | ✓ | Public | | | | | | | ✓ |
| OO 12 | Modules and sections required to complete | ✓ | Public | | | | | | | ✓ |

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



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PRI Principles for Responsible Investment

| 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 | ✓ | Private | ✓ | | | | | | |
| LEI 03 | Percentage of each incorporation strategy | ✓ | Public | ✓ | | | | | | |
| LEI 04 | Type of ESG information used in investment decision | - | n/a | ✓ | | | | | | |
| 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 | 🔒 | n/a | ✓ | | | | | | |
| LEI 10 | Description of ESG integration | ✓ | Private | ✓ | | | | | | |
| LEI 11 | Review ESG issues while researching companies/sectors | ✓ | Public | ✓ | | | | | | |
| LEI 12 | Processes to ensure integration is based on robust analysis | - | n/a | ✓ | | | | | | |
| LEI 13 | Aspects of analysis ESG information is integrated into | - | n/a | ✓ | | | | | | |
| 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 | - | n/a | ✓ | | | | | | |
| LEI 17 | Examples of ESG issues that affected your investment view / performance | - | n/a | ✓ | | | | | | |
| LEI 18 | Disclosure of approach to ESG incorporation | ✓ | Public | | ✓ | | | | ✓ | |



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| 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 | ✓ | Public | | ✓ | | | | | |
| LEA 04 | Objectives for engagement activities | ✓ | Public | | ✓ | | | | | |
| 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 | ✓ | Public | ✓ | ✓ | | | | | |
| 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 | - | n/a | | ✓ | | | | | |
| LEA 15 | Disclosure of approach to ESG engagements | ✓ | Public | | ✓ | | | | ✓ | |
| LEA 16 | Description of approach to (proxy) voting | 🔒 | n/a | | ✓ | | | | | |
| LEA 17 | Typical approach to (proxy) voting decisions | 🔒 | n/a | | ✓ | | | | | |
| LEA 18 | Percentage of voting recommendations reviewed | 🔒 | n/a | | ✓ | | | | | |
| LEA 19 | Confirmation of votes | 🔒 | n/a | | ✓ | | | | | |
| LEA 20 | Securities lending programme | 🔒 | n/a | | ✓ | | | | | |
| LEA 21 | Informing companies of the rationale of abstaining/voting against management | 🔒 | n/a | | ✓ | | | | | |
| LEA 22 | Percentage of (proxy) votes cast | 🔒 | n/a | | ✓ | | | | | |
| LEA 23 | Proportion of ballot items that were for/against/abstentions | 🔒 | n/a | | ✓ | | | | | |
| LEA 24 | Shareholder resolutions | 🔒 | n/a | | ✓ | | | | | |
| LEA 25 | Examples of (proxy) voting activities | 🔒 | n/a | | ✓ | | | | | |
| LEA 26 | Disclosing voting activities | 🔒 | n/a | | ✓ | | | | ✓ | |



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PRI Principles for Responsible Investment

# Carnegie Asset Management

## Reported Information

## Public version

### Organisational Overview

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PRI Principles for Responsible Investment

## 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

☐ Other, specify

☐ Execution and advisory only services

**OO 02** | Mandatory | Peering | General

**OO 02.1** Select the location of your organisation's headquarters.

Denmark

**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

90

**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



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## OO 04.1 Indicate the year end date for your reporting year.

31/12/2013

## OO 04.2 Indicate your total AUM at the end of your reporting year.

| | trillions | billions | millions | thousands | hundreds |
|---|---|---|---|---|---|
| Total AUM | | 10 | 940 | 000 | 000 |
| Currency | EUR | | | | |
| Assets in USD | | 14 | 410 | 103 | 335 |

## OO 04.3 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 percentage breakdown

| | Internally managed (%) | Externally managed (%) |
|---|---|---|
| Listed equity | 90 | 0 |
| Fixed income – corporate | 10 | 0 |
| Fixed income – government | 0 | 0 |
| Fixed income – other | 0 | 0 |
| Private debt | 0 | 0 |
| Private equity | 0 | 0 |
| Property | 0 | 0 |
| Infrastructure | 0 | 0 |
| Commodities | 0 | 0 |
| Hedge funds | 0 | 0 |
| Forestry | 0 | 0 |



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| | | |
|---|---|---|
| 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 broad ranges

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

| OO 08 | Mandatory to Report Voluntary to Disclose | Peering | General |
|---|---|---|---|

**OO 08.1** Indicate the breakdown of your organisation's AUM by market.

| Market breakdown | % of AUM |
|---|---|
| Developed Markets | ○ 0%<br>○ <10%<br>○ 10-50%<br>◉ >50 % |
| Emerging, Frontier and Other Markets | ○ 0%<br>◉ <10%<br>○ 10-50%<br>○ >50 % |

## 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

☐ 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

☐ 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. They are based on the percentages provided in your AUM breakdown and your responses to the gateway indicators. Note, 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. Direct - Fixed Income and Infrastructure are always 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

| | Direct - Fixed Income |
|---|---|

☐ Fixed Income - Corporate

**Closing module**

☑ Closing module

**Note:** Please make sure your response to this indicator is complete and confirmed before you progress. Your response will determine which tailored modules and sections you will be presented with.



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Carnegie Asset Management

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## 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



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PRI Principles for Responsible Investment

| 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] |
|---|---|

Carnegie Asset Management is a highly focused Investment Management organisation which offers high quality investment products to investors selectively around the world. Carnegie Asset Management Fondsmæglerselskab Holding A/S (CAM) is a signatory of the United Nations Principles for Responsible Investment (UN PRI).

The UN PRI are a set of principles that encourage the adaption of Environmental, Social and Governance (ESG) issues in the investment analysis of companies.

In our role as Investment Manager, our mandate is to maximize client portfolio returns over the long-term, at appropriate risk levels. In this fiduciary role, we believe that ESG issues can affect the performance of shares in an investment portfolio. Therefore, where consistent with our fiduciary responsibilities, we commit to encouraging sustainable business behaviour in the companies we invest in.

Carnegie Asset Management (CAM) is a UN PRI signatory as of January 2012.

As an active owner we have incorporated ESG issues into our ownership policies and practices. We also recognise that applying these Principles may better align investors with broader objectives of society. Therefore, where consistent with our fiduciary responsibilities, we commit to the following:

- To incorporate ESG issues into our investment analysis and decisionmaking process
- To be active owners and incorporate ESG issues into our ownership policies and practices
- To seek appropriate disclosure on ESG issues by the entities in which we invest
- To promote acceptance and implementation of the Principles within the investment industry
- To work together to enhance our effectiveness in implementing the Principles
- To make a report on our activities and progress towards implementing the Principles

This commitment is a multi-year process for CAM, and we see the UN Principles for Responsible Investment as an appropriate framework. Where relevant, CAM will analyse ESG issues and apply them on a case by case basis. The overall decision making process will be a holistic one, as fundamental financial analysis will be supplemented, where appropriate, by ESG and other non-financial factors.

| 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 |
|---|---|

http://carnegieam.com/investment-philosophy/responsible-investments

○ No



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

◉ 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. |
|---|---|

| Policy or document name | URL |
|---|---|
| Carnegie Worldwide Ethical | http://www.carnegieam.com/funds---luxembourg/carnegie-worldwide-ethical |

○ 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 |
|---|---|
| ☑ Policy setting out your overall approach | ○ Applicable policies cover all AUM |
| ☐ (Proxy) voting policy | ◉ Applicable policies cover a majority of AUM |
| ☑ Engagement/active ownership policy | ○ Applicable policies cover a minority of AUM |
| ☐ Specific guidelines on corporate governance | |
| ☐ Specific guidelines on environmental issues | |
| ☐ Specific guidelines on social issues | |
| ☐ Asset class-specific guidelines | |
| ☑ Screening/exclusion policy | |
| ☐ Other, specify | |
| ☐ Other, specify | |

| OA 03.2 | Comment on any variations or exceptions in the coverage of your responsible investment policy. [Optional] |
|---|---|

Fixed income - sovereign is not covered by the overall screening and engagement policies. The value-based screening leading to exclusions is only applied for a specific fund - Carnegie Worldwide Ethical.



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| 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]

Investment decisions are discussed within the investment group, where conflicts of interest will be raised and discussed openly.

○ No

## Objectives and strategies

| OA 05 | Mandatory | Gateway/Core Assessed | General |
|---|---|---|---|

**OA 05.1** Indicate if your organisation sets objectives for its responsible investment activities.

◉ Yes

**OA 05.2** Indicate how frequently your organisation sets or revises objectives for responsible investment.

◉ At least once per year

○ Less than once per year

**OA 05.3** Indicate how frequently your organisation formally reviews performance against its objectives for responsible investment.

○ Quarterly

○ Biannually

◉ Annually

○ Every two years or less

○ It is not reviewed

○ No

| OA 06 | Voluntary | Descriptive | General |
|---|---|---|---|

**OA 06.1** List your three main responsible investment objectives you had set for the reporting year. For each, indicate any key performance indicators you set to measure your progress and also indicate your progress towards achieving your objectives.

☑ Add responsible investment objective 1



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| | |
|---|---|
| Objective 1 | Streamline and standardise investment and reporting processes in order to comply with PRI reporting framework. |
| Key performance indicators | Compliance with PRI reporting framework. |
| Describe the progress achieved | Achieved. |

☐ Add responsible investment objective 2

☐ Add responsible investment objective 3

**OA 06.2** List your three main objectives for responsible investment implementation for the next reporting year and indicate any key performance indicators you intend to use to measure your progress.

☑ Add responsible investment objective 1 for the next reporting year

| | |
|---|---|
| Objective 1 for the next reporting year | Contiue to streamline and standardise investment and reporting processes in order to comply with PRI reporting framework. |
| Key performance indicators | Compliance with PRI reporting framework. |

☐ Add responsible investment objective 2 for the next reporting year

☐ Add responsible investment objective 3 for the next reporting year

## Governance and human resources

**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

Head of Clients & Marketing



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☑ Oversight/accountability for responsible investment

☐ Implementation of responsible investment

☐ No oversight/accountability or implementation responsibility for responsible investment

☑ Portfolio managers

☑ Oversight/accountability for responsible investment

☑ Implementation of responsible investment

☐ No oversight/accountability or implementation responsibility for responsible investment

☑ Investment analysts

☐ Oversight/accountability for responsible investment

☐ Implementation of responsible investment

☑ No oversight/accountability or implementation responsibility for responsible investment

☑ Dedicated responsible investment staff

☑ Oversight/accountability for responsible investment

☑ Implementation of responsible investment

☐ No oversight/accountability or implementation responsibility for responsible investment

☑ External managers or service providers

☐ Oversight/accountability for responsible investment

☑ Implementation of responsible investment

☐ No oversight/accountability or implementation responsibility for responsible investment

☐ Other role, specify

☐ Other role, specify

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

| | Number |
|---|---|

4

## Promoting responsible investment

**OA 10** | **Mandatory** | **Core Assessed** | **PRI 4,5**

**OA 10.1** Indicate if your organisation is a member of and/or participant in any collaborative organisation or initiatives that promote responsible investment.

◉ Yes

**OA 10.2** 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**



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PRI Principles for Responsible Investment

☐ Asian Corporate Governance Association

☐ Association for Sustainable & Responsible Investment in Asia

☐ Australian Council of Superannuation Investors

☐ CDP Climate Change

☐ CDP Forests

☐ CDP Water

☐ 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

☑ Principles for Responsible Investment

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

☑ Basic

☐ Moderate

☐ Advanced

☐ 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

☐ Other collaborative organisation/initiative, specify

☐ Other collaborative organisation/initiative, specify

☐ Other collaborative organisation/initiative, specify

○ No

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

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

◉ Yes



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| 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

Carnegie offers investors the possibility to invest in ethical funds - Carnegie Worldwide Global Equities SRI and Carnegie Worldwide Ethical.

○ No

## Asset class implementation not reported in other modules

| OA 15 | Voluntary | Descriptive | General |
|---|---|---|---|

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

| Asset Class | Describe what processes are in place and the outputs or outcomes achieved |
|---|---|
| Fixed income - corporate | Responsible investments in fixed income - corporate is handled in a similar way as equity. The same screening and engagement processes are in place and ESG issues are taken into account on a case-by-case approach. |



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PRI Principles for Responsible Investment

Carnegie Asset Management

# Reported Information

# Public version

## Direct - Listed Equity Incorporation

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## Overview

| LEI 01 | Mandatory to Report Voluntary to Disclose | Gateway/Peering | PRI 1 |
|---|---|---|---|

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

**Strategies**

☐ Passive

☐ Active – quantitative (quant)

☑ Active – fundamental and other active strategies

| | % of internally managed listed equities |
|---|---|

○ <10%

○ 10-50%

◉ >50%

## 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)

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

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

☑ Screening + Integration strategies



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| | |
|---|---|
| Percentage of active listed equity to which the strategy is applied (estimate +/- 10%) | % <br> 100 |

☐ Thematic + integration strategies

☐ Screening + thematic strategies

☐ All three strategies combined

☐ No incorporation strategies applied

**Total actively managed listed equities**

100%

**LEI 03.2** Describe your primary reasons for choosing a particular ESG incorporation strategy.

All listed equities are screened for violations of international norms and conventions. This norm-based screening process ensures that holdings behave according to society's minimum expectations for ESG management or face proper engagement to solve any issues.

At Carnegie Asset Management we believe that ESG issues can affect the performance of shares in an investment portfolio. Therefore we facilitate and encourage portfolio managers to take ESG issues into account in the investment process.

For the Carnegie Worldwide Ethical fund we add the value-based screening in order to provide investors with the possibility to avoid investing in what these investors may consider controversial business activities.

## (A) Implementation: Screening

| LEI 06 | Mandatory | Descriptive | PRI 1 |
|---|---|---|---|

**LEI 06.1** Indicate and describe the type of screening you apply to your internally managed active listed equities.

**Type of screening**

☑ Negative/exclusionary screening

**Screened by**



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☑ Product

☐ Activity

☐ Sector

☐ Country/geographic region

☐ Environmental and social practices and performance

☐ Corporate governance

Description

The Carnegie Worldwide Ethical fund applies negative screening for weapon, tobacco, alcohol, adult entertainment and gambling in combination with a norm-based screening.

☐ 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

The screening provider has a comprehensive screening process including UN Guiding Principles, environmental conventions and other conventions and guidelines.

Description

The norm-based screening is applied to all listed equity.

**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.

GES has over more than 20 years built a model for norm-based screening, which is reviewed and updated on an ongoing basis, whenever relevant norms and conventions are introduced.

| 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 07.2 | Additional information. [Optional] |
|---|---|

The norm-based screening process is ARISTA quality certified.

## (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 | ○ We systematically review the potential significance of environmental issues and investigate them accordingly<br>◉ We occasionally review the potential significance of environmental issues and investigate them accordingly<br>○ We do not review environmental issues |
| Social | ○ We systematically review the potential significance of social issues and investigate them accordingly<br>◉ We occasionally review the potential significance of social issues and investigate them accordingly<br>○ We do not review social issues |
| Corporate Governance | ◉ We systematically review the potential significance of corporate governance issues and investigate them accordingly<br>○ We occasionally review the potential significance of corporate governance issues and investigate them accordingly<br>○ We do not review corporate governance issues |



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| LEI 11.2 | Additional information. [Optional] |
|---|---|

We systematically facilitate ESG related information to portfolio managers, but it is up to the individual portfolio manager how this information should be taken into account. It is, however, a prerequisite for Carnegie Asset Management to invest in a company that it has a certain level of governance practices. The portfolio managers are systematically challenged with ESG issues at the presentation of the investment case in the investment committee.

## 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 |
|---|---|

http://www.carnegieam.com/investment-philosophy/responsible-investments

| | Provide URL |
|---|---|

http://www.carnegieam.com/funds---luxembourg/carnegie-worldwide-ethical

| 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



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| 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



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Carnegie 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 |
|---|---|
| **Individual/Internal staff engagements** | ☑ To support investment decision-making (e.g. company research)<br>☑ To influence corporate practice (or identify the need to influence) on ESG issues<br>☐ To encourage improved ESG disclosure<br>☐ Other, specify<br>☐ We do not engage via internal staff |
| **Collaborative engagements** | ☐ To support investment decision-making (e.g. company research)<br>☐ To influence corporate practice (or identify the need to influence) on ESG issues<br>☐ To encourage improved ESG disclosure<br>☐ Other, specify<br>☑ We do not engage via collaborative engagements |
| **Service provider engagements** | ☑ To support investment decision-making (e.g. company research)<br>☑ To influence corporate practice (or identify the need to influence) on ESG issues<br>☑ To encourage improved ESG disclosure<br>☐ Other, specify<br>☐ We do not engage via service providers |

## Process

## Process for engagements run internally

| LEA 03 | Mandatory | Core Assessed | PRI 2 |
|---|---|---|---|

**LEA 03.1** Indicate whether your organisation has a formal process for identifying and prioritising engagement activities carried out by internal staff.

◉ Yes



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| LEA 03.2 | Describe how you identify and prioritise engagements. |
|---|---|

Carnegie Asset Management performs engagement on Nordic holdings that may be identified from the screening process of violations of international norms and conventions.

Additionally, Carnegie will engage with companies, who show consistent poor performance in the engagement process with the service provider.

○ 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. |
|---|---|

The Portfolio Managers follow the companies closely and whenever an ESG issue is brought into the engagement that Portfolio Managers do with companies, the progress of this issue is followed as closely as any other engagement issues.

○ No

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

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



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| 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

The online engagement forum gives furthermore access to rating of the engagement dialogue, minutes of meetings, media coverage related to case, etc.

☐ None of the above

## 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. |
|---|---|



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| Type of engagement | Insights shared |
|---|---|
| **Individual/Internal staff engagements** | ◉ Yes, systematically<br>○ Yes, occasionally<br>○ No |
| **Service provider engagements** | ◉ Yes, systematically<br>○ Yes, occasionally<br>○ No |

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

**LEA 10.1** Indicate if you track the number of companies you engage with.

| Type of engagement | Tracking engagements |
|---|---|
| **Individual / Internal staff engagements** | ◉ Yes, we track the number of our engagements in full<br>○ Yes, we partially track the number of our engagements<br>○ No, we do not track our engagements but can provide a reasonable estimate of our engagement numbers<br>○ No, we do not track and cannot estimate our engagements |
| **Service provider engagements** | ◉ Yes, we track the number of our engagements in full<br>○ Yes, we partially track the number of our engagements<br>○ No, we do not track our engagements but can provide a reasonable estimate of our engagement numbers<br>○ No, we do not track and cannot estimate our engagements |

## 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

○ We disclose it to clients and/or beneficiaries only

◉ We do not proactively disclose it to the public and/or clients/beneficiaries.



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| LEA 15.6 | Additional information. [Optional] |
|---|---|

It will often have a negative impact on the engagement process, if you disclose too much information about the ongoing engagement. Effective engagement requires trust, where confidential information can be shared and difficult discussions can be made without fear for seeing the information in the public space.



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