PRI Principles for Responsible Investment

RI TRANSPARENCY REPORT

2013/14

Meriten Investment Management Gmbh

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	✓	Private							✓
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	🔒	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	-	n/a							✓
OA 10	Collaborative organisations / initiatives	✓	Public				✓	✓		
OA 11	Promoting RI independently	✓	Public				✓			
OA 12	Dialogue with public policy makers or standard setters	-	n/a				✓	✓	✓	
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	-	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	-	n/a							✓
OA 19	Internal and external review and assurance of responses	-	n/a							✓

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Direct - Listed Equity Incorporation				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
LEI 01	Breakdown by passive, quantitative, fundamental and other active strategies	✓	Public	✓						
LEI 02	Description of ESG incorporation	✓	Public	✓						
LEI 03	Percentage of each incorporation strategy	✓	Public	✓						
LEI 04	Type of ESG information used in investment decision	✓	Public	✓						
LEI 05	Information from engagement and/or voting used in investment decision-making	🔒	n/a	✓						
LEI 06	Types of screening applied	✓	Public	✓						
LEI 07	Processes to ensure screening is based on robust analysis	✓	Public	✓						
LEI 08	Processes to ensure fund criteria are not breached	✓	Public	✓						
LEI 09	Types of sustainability thematic funds/mandates	🔒	n/a	✓						
LEI 10	Description of ESG integration	🔒	n/a	✓						
LEI 11	Review ESG issues while researching companies/sectors	🔒	n/a	✓						
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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PRI Principles for Responsible Investment

Meriten Investment Management Gmbh

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.

Germany

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

180

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		22	300	170	267
Currency	EUR				
Assets in USD		29	373	652	463

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	9	0
Fixed income – corporate	39	0
Fixed income – government	22	0
Fixed income – other	15	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	2	13
Other (2), specify	0	0

'Other (1)' specified

Emerging markets, ABS, Mutual Funds

○ 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% ○ <10% ○ 10-50% ◉ >50 %
Emerging, Frontier and Other Markets	○ 0% ◉ <10% ○ 10-50% ○ >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

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OO 10.2	Indicate if your combined internally and externally managed listed equities are 10% or more of your total AUM.

○ Yes, our total listed equities are 10% or more of our total AUM

◉ No, our total listed equities are less than 10% of our total AUM

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

☑ Fixed Income – other

☐ Other (1)

☐ None of the above

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

Emerging Markets, ABS, Mutual Funds

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.

☐ Other (1)

☑ None of the above

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

Emerging markets, ABS, Mutual Funds

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

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Direct - Listed Equity active ownership

☐ (Proxy) voting

Direct - Fixed Income

☐ Fixed Income - Corporate

☐ Fixed Income - Government

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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Reported Information

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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

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://www.meriten.com/en/Corporate-Governance/Responsible-Investing.htm

- ( ) No

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
Corporate Governance	http://www.meriten.de/en/Corporate-Governance/Best-Execution-Policy.html

- ( ) No

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PRI Principles for Responsible Investment

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 ☐ (Proxy) voting policy ☐ Engagement/active ownership policy ☐ 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	◉ Applicable policies cover all AUM ○ Applicable policies cover a majority of AUM ○ 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]

In all our funds we exclude manufacturers of cluster munitions. In some of the funds we use additional exclusion policies or follow a best-in-class benchmark.

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

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OA 04.2	Describe your policy on managing potential conflicts of interest in the investment process. [Optional]

Both Meriten Investment Management GmbH (Meriten Investment Management) and its employees consider the identification and avoidance of conflicts of interest as well as the adequate handling of such conflicts of interest an essential prerequisite for providing our clients with high-quality services. It is our objective to address any conflicts of interest in a manner that ensures fair treatment for all parties involved.

Identifying, avoiding or handling conflicts of interest efficiently and swiftly helps us maintain and expand client relationships and business segments.

Conflicts of interest may primarily originate from within Meriten Investment Management, which are described below in more detail.

Vis-à-vis our shareholders and affiliated companies, we use Chinese walls that are subject to monitoring and have proved stable. Activities of shareholders or affiliates of our company and its agents are therefore only relevant if they have a direct impact on our clients.

An investment company with a broad client base may encounter conflicts of interest in a variety of circumstances. In accordance with applicable laws and regulations, we have implemented a number of systems and control mechanisms to manage conflicts of interest in order to prevent our clients from being prejudiced.

Conflicts of interest may arise from an incompatibility of interests between Meriten Investment Management or third parties and clients or an investment fund, between different clients, between a client and an investment fund, or between two investment funds. Situations where there is no risk of loss for clients or where clients are not put at a disadvantage do not constitute relevant conflicts of interests in this sense.

There is a series of circumstances which might result in Meriten Investment Management encountering such conflicts of interest in pursuing its business activities. Such potential conflicts of interest include in particular:

Incentive systems for employees of the company
Personal account dealings
Inducements for employees of the company
Regrouping of assets within the investment fund
Window dressing (measures aimed at improving the appearance of portfolio performance as per reporting date)
Transactions between the company and investment funds or individual portfolios it manages or
Transactions between investment funds and/or individual portfolios managed by the company
Aggregation of multiple orders (block trades)
Contracting with companies or persons that are closely affiliated
Single investments that are substantial in size
Frequent Trading
Definition of cut-off times for trades in mutual fund units
Allotment of new issues

By taking appropriate organisational measures, we have ensured that risk of disadvantages arising for the individual investor from conflicts of interest is reduced to a minimum and have implemented several processes and controls to identify,

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manage and solve potential conflicts of interest. The effectiveness of such protective mechanisms is subject to monitoring by our Compliance Officer.

The measures put in place are regularly audited by the Compliance Officer and other employees entrusted with controlling activities and will be adjusted, as required.

Should the measures taken by us prove insufficient to prevent the interest of one or more clients from being harmed, the client service manager or the fund manager will notify his/her client about such conflict of interest prior to executing the relevant transaction and will execute or proceed with such transaction solely with the client's express consent.

○ 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

◉ 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.

The investment controlling department ensures that manufactures of cluster munitions are excluded from the investment universe of Meriten Investment Management. It also reviews other restrictions in mandates where ESG issues are incorporated. The head of the department reports into the COO.

Within our product team (comprising product specialists and product development) two people allocate part of their time to ESG related questions. The head of the department reports into the CEO.

Our Team Quantitative Products&Research manages a ESG Mutual fund where the universe is defined by a sustainable benchmark (best-in-class approach). This benchmark will change to a more restrictive benchmark which excludes alcohol,gambling,tobacco,armament, firearms and adult entertainment. The head of the department reports into the head of Quantitative & Equity Products.

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

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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 Investment Controlling

- ☑ Oversight/accountability for responsible investment
- ☐ Implementation of responsible investment
- ☐ No oversight/accountability or implementation responsibility for responsible investment

☑ Portfolio managers

- ☐ Oversight/accountability for responsible investment
- ☑ Implementation of responsible investment
- ☐ No oversight/accountability or implementation responsibility for responsible investment

☑ Investment analysts

- ☐ Oversight/accountability for responsible investment
- ☐ Implementation of responsible investment
- ☑ No oversight/accountability or implementation responsibility for responsible investment

☑ Dedicated responsible investment staff

- ☑ Oversight/accountability for responsible investment
- ☐ Implementation of responsible investment
- ☐ No oversight/accountability or implementation responsibility for responsible investment

☐ External managers or service providers

☑ Other role, specify

Provider of ESG Benchmark Index

- ☑ Oversight/accountability for responsible investment
- ☐ Implementation of responsible investment
- ☐ No oversight/accountability or implementation responsibility for responsible investment

☐ Other role, specify

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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

☐ 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

Forum Nachhaltige Geldanlagen e.V.

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PRI Principles for Responsible Investment

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

☑ Basic

☐ Moderate

☐ Advanced

☐ 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

◉ No

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Direct - Listed Equity Incorporation

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PRI Principles for Responsible Investment

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

	% of internally managed listed equities

◉ <10%

Report on your strategies that represent <10% of listed equities

○ Yes

◉ No

○ 10-50%

○ >50%

☑ Active – quantitative (quant)

	% of internally managed listed equities

○ <10%

◉ 10-50%

○ >50%

☑ Active – fundamental and other active strategies

	% of internally managed listed equities

○ <10%

◉ 10-50%

○ >50%

LEI 02	Voluntary	Descriptive	PRI 1

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

In all our funds we exclude manufacturers of cluster munitions. In some of the funds we observe additional exclusions. In our mutual ESG fund (BNY Mellon Sustainability Fund) we follow a best-in-class benchmark and restrict the universe to the universe of the index Stoxx Europe Sustainability Index. In this fund we will move to the more restrictive ex AGTAFA version which excludes producers of alcohol, gambling, tobacco, armament, fire arms and adult entertainment.

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 (estimate +/- 10%)	%
	100

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

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

☐ Screening + Integration strategies

☐ Thematic + integration strategies

☐ Screening + thematic strategies

☐ All three strategies combined

☐ No incorporation strategies applied

	Total actively managed listed equities

100%

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

We do not conduct specific ESG research but rely on external sources. All stocks in our equity universe are screened to exclude producers of cluster munitions. In some funds we observe additional exclusions. In our ESG mutual fund (BNY Mellon Sustainability Fund) we use a a best-in-class index (Stoxx Europe Sustainability index) to define the investment universe. In this fund we will move to a more restrictive version which excludes producers of alcohol, gambling,tobacco, armament, fire arms and adult entertainment.

LEI 04	Voluntary	Additional Assessed	PRI 1

LEI 04.1	Indicate what ESG information you use in your ESG incorporation strategies and who provides this information.

Type of ESG information

- ☐ Raw ESG company data
- ☐ Company-related analysis or ratings
- ☐ Sector-related analysis or ratings
- ☐ Country-related analysis or ratings
- ☐ Screened stock list
- ☐ Issue-specific analysis or ratings
- ☑ Other, specify

We restrict our investment universe in dedicated ESG products to the universe of Sustainability Indices.

Indicate who provides this information

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

LEI 04.3	Indicate if you incentivise brokers to provide ESG research.

- ○ Yes
- ○ No

(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

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☑ Negative/exclusionary screening

Screened by

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

Description

We exclude in all our funds manufacturers of cluster munitions.

☑ Positive/best-in-class screening

Screened by

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

Description

In a dedicated ESG equity product we invest in a universe which is defined by the benchmark index Stoxx Europe Sustainability index, advised by Bank J. Safra Sarasin AG. The advisor follows a best-in-class approach. We will move to the more restrictive version Stoxx Europe Sustainability ex AGTAFA, which excludes manufacturers of alcohol, gambling, tobacco, armament, firearms and adult entertainment.

☐ Norms-based screening

LEI 06.2 Describe how the screening criteria are established, how often the criteria are reviewed and how you notify clients and/or beneficiaries when changes are made.

The Stoxx Europe sustianability indices which define our universe are revised each month.

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

We use the universe of the Stoxx Europe sustainability indices as our universe in dedicated ESG products. We believe that this indices offer high quality.

☐ None of the above

LEI 08	Voluntary	Additional Assessed	PRI 1

LEI 08.1	Indicate which processes your organisation uses to ensure that fund criteria are not breached

☐ Checks are performed to ensure that stocks meet the funds' screening criteria. These checks are:

☑ Automated IT systems prevent investment managers from investing in excluded stocks or those that do not meet positive screening criteria.

☑ Audits of fund holdings are undertaken regularly by internal audit function

☐ Other, specify

☐ None of the above

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

◉ We disclose it to clients and/or beneficiaries only

LEI 18.3	Indicate the information your organisation proactively discloses to clients/ beneficiaries regarding your approach to ESG incorporation.

◉ Broad approach to ESG incorporation

○ Detailed explanation of ESG incorporation strategy used

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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

( ) We do not proactively disclose it to the public and/or clients/beneficiaries

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