



| LEA 02  | Disclosures<br>Monetary   | Reason<br>Gateway   | Principle<br>PRI<br>1,2,3 |
|---|---|---|---------------------------|
| <p><b>Type of engagement</b><br/>Individual/ internal staff<br/>engagements</p> | <p><b>Reason for interaction</b></p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> To support investment decisionmaking in &amp; company relevant ESG issues</li> <li><input checked="" type="checkbox"/> To influence corporate practice or identify the need for additional or</li> <li><input checked="" type="checkbox"/> To engage internal ESG decision</li> <li><input type="checkbox"/> Other: specify</li> <li><input type="checkbox"/> We do not engage in internal staff</li> </ul> | <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> To support investment decisionmaking in &amp; company relevant ESG issues</li> <li><input checked="" type="checkbox"/> To influence corporate practice or identify the need for additional or</li> <li><input checked="" type="checkbox"/> To engage internal ESG decision</li> <li><input type="checkbox"/> Other: specify</li> <li><input type="checkbox"/> We do not engage in collaborative engagements</li> </ul> |                           |
| <p><b>Collaborative engagements</b></p>   | <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> To support investment decisionmaking in &amp; company relevant ESG issues</li> <li><input checked="" type="checkbox"/> To influence corporate practice or identify the need for additional or</li> <li><input checked="" type="checkbox"/> To engage internal ESG decision</li> <li><input type="checkbox"/> Other: specify</li> <li><input type="checkbox"/> We do not engage in collaborative engagements</li> </ul>                           | <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> To support investment decisionmaking in &amp; company relevant ESG issues</li> <li><input checked="" type="checkbox"/> To influence corporate practice or identify the need for additional or</li> <li><input checked="" type="checkbox"/> To engage internal ESG decision</li> <li><input type="checkbox"/> Other: specify</li> <li><input type="checkbox"/> We do not engage in collaborative engagements</li> </ul> |                           |
| <p><b>Service provider engagements</b></p>                                      | <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> To support investment decisionmaking in &amp; company relevant ESG issues</li> <li><input checked="" type="checkbox"/> To influence corporate practice or identify the need for additional or</li> <li><input checked="" type="checkbox"/> To engage internal ESG decision</li> <li><input type="checkbox"/> Other: specify</li> <li><input type="checkbox"/> We do not engage in collaborative engagements</li> </ul>                           | <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> To support investment decisionmaking in &amp; company relevant ESG issues</li> <li><input checked="" type="checkbox"/> To influence corporate practice or identify the need for additional or</li> <li><input checked="" type="checkbox"/> To engage internal ESG decision</li> <li><input type="checkbox"/> Other: specify</li> <li><input type="checkbox"/> We do not engage in collaborative engagements</li> </ul> |                           |

# RI TRANSPARENCY REPORT

## 2013/14

Trillium 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 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.

# 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                          | ✓      | Private    |           |   |   |   |   |   | ✓       |
| 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                                    | ✓      | Private    |           |   |   |   |   |   | ✓       |
| OA 07                | Governance, management structures and RI processes                 | ✓      | Private    |           |   |   |   |   |   | ✓       |
| 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 | ✓      | Private    |           |   |   |   |   |   | ✓       |
| 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         | ✓      | 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                                 | ✓      | 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  | ✓      | Private    | ✓         |   |   |   |   |   |         |
| 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                          | ✓      | Private    | ✓         |   |   |   |   |   |         |
| 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               | ✓      | Public     |           | ✓ |   |   |   |   |         |
| LEA 04                                  | Objectives for engagement activities   | ✓      | Public     |           | ✓ |   |   |   |   |         |
| LEA 05                                  | Process for identifying and prioritising engagement activities               | ✓      | Public     |           | ✓ |   |   |   |   |         |
| LEA 06                                  | Objectives for engagement activities   | ✓      | Public     |           | ✓ |   |   |   |   |         |
| LEA 07                                  | Role in engagement process   | 🔒      | n/a        |           | ✓ |   | ✓ |   |   |         |
| LEA 08                                  | Monitor / discuss service provider information                               | 🔒      | n/a        |           | ✓ |   |   |   | ✓ |         |
| LEA 09                                  | Share insights from engagements with internal/external managers              | ✓      | 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                | ✓      | Public     |           | ✓ |   |   |   |   |         |
| LEA 14                                  | Examples of ESG engagements  | ✓      | Private    |           | ✓ |   |   |   |   |         |
| 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                                | ✓      | Public     |           | ✓ |   |   |   |   |         |
| 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     |           | ✓ |   |   |   | ✓ |         |

# Trillium 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

Other, specify

Execution and advisory only services

|       |           |         |         |
|-------|-----------|---------|---------|
| OO 02 | Mandatory | Peering | General |
|-------|-----------|---------|---------|

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

United States

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

30

OO 02.4 Additional information. [Optional]

|       |           |             |         |
|-------|-----------|-------------|---------|
| 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 03.3** Additional information. [Optional]

Trillium is based in Boston, MA with offices in Durham, NC and Larkspur, CA. Our employee-owned firm was founded explicitly to benefit our clients, society, the environment, as well as our employee shareholders.

**OO 04** **Mandatory** Gateway/Peering General

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

09/30/13

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

|               | trillions | billions | millions | thousands | hundreds |
|---------------|-----------|----------|----------|-----------|----------|
| Total AUM     |           | 1        | 300      | 000       | 000      |
| Currency      | USD       |          |          |           |          |
| Assets in USD |           | 1        | 300      | 000       | 000      |

**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 broad ranges

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



|                      |      |   |
|----------------------|------|---|
| Fixed income – other | 0    | 0 |
| Private debt         | <10% | 0 |
| Private equity       | <10% | 0 |
| Property             | 0    | 0 |
| Infrastructure       | 0    | 0 |
| Commodities          | 0    | 0 |
| Hedge funds          | 0    | 0 |
| Forestry             | 0    | 0 |
| Farmland             | 0    | 0 |
| Inclusive finance    | 0    | 0 |
| Cash                 | <10% | 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 |
|----------------|--|---------|---------|
| <b>OO 10.1</b> | Select the responsible investment activities your organisation implemented, directly and/or indirectly, for listed equities in the reporting year.   |         |         |
|                | <input checked="" type="checkbox"/> We incorporate ESG issues into investment decisions on our internally managed assets<br><input checked="" type="checkbox"/> We engage with companies on ESG issues via our staff, collaborations or service providers<br><input checked="" type="checkbox"/> We cast our (proxy) votes directly or via service providers<br><input type="checkbox"/> 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
- Private debt
- Private equity
- Cash
- None of the above

|              |                  |                |                |
|--------------|------------------|----------------|----------------|
| <b>OO 12</b> | <b>Mandatory</b> | <b>Gateway</b> | <b>General</b> |
|--------------|------------------|----------------|----------------|

**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
- (Proxy) voting

Direct - Fixed Income

- Fixed Income - Corporate
- Fixed Income - Government

Direct - Other asset classes with dedicated modules

- Private Equity

**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.

# Trillium 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]

Trillium believes that companies that adhere to strong positive Environmental, Social and Governance (ESG) policies can increase profitability and develop a competitive edge. We have found that integrating ESG factors into the investment process is the best way to deliver strong long-term, risk adjusted returns to our clients.

|       |           |               |       |
|-------|-----------|---------------|-------|
| 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.trilliuminvest.com/esg-investment/esg-integration/>

- 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   |
|-------------------------|---|
| Advocacy & Policy       | <a href="http://www.trilliuminvest.com/esg-investment/esg-impact/shareholder-advocacy-public-policy/">http://www.trilliuminvest.com/esg-investment/esg-impact/shareholder-advocacy-public-policy/</a> |

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 checked="" type="checkbox"/> Specific guidelines on corporate governance<br><input checked="" type="checkbox"/> Specific guidelines on environmental issues<br><input checked="" 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 type="radio"/> Applicable policies cover all AUM<br><input checked="" type="radio"/> Applicable policies cover a majority of AUM<br><input type="radio"/> Applicable policies cover a minority of AUM |

**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  
 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

## 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  
**Director of Research**

- 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
- External managers or service providers
- Other role, specify
- Other role, specify

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

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

11

## Promoting responsible investment

|              |                  |                      |                |
|--------------|------------------|----------------------|----------------|
| <b>OA 10</b> | <b>Mandatory</b> | <b>Core Assessed</b> | <b>PRI 4,5</b> |
|--------------|------------------|----------------------|----------------|

|                |   |
|----------------|---|
| <b>OA 10.1</b> | Indicate if your organisation is a member of and/or participant in any collaborative organisation or initiatives that promote responsible investment. |
|----------------|---|

Yes

|                |   |
|----------------|---|
| <b>OA 10.2</b> | 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)

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

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

Trillium has been a long-time collaborator with ICCR, assuming both leadership and membership roles.

- International Corporate Governance Network (ICGN)
- Investor Group on Climate Change, Australia/New Zealand (IGCC)
- Investor Network on Climate Risk (INCR)/CERES

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

- Basic
- Moderate
- Advanced



Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

Trillium was a co-founder of Ceres and incubated the non-profit in our offices. We continue to have a close collaboration with the organization.

- 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

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

Trillium has been publicly supportive of PRI and share the belief that increased transparency is positive.

- Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify

USSIF

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

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

Trillium is a co-founder of US SIF. Our Head of Business Development, Paul Hilton, was recently named Chair of the USSIF Board of Directors. In addition, our CEO, Matt Patsky, is a former member of this USSIF Board and Cheryl Smith, Managing Partner is a past Chair of the USSIF Board.

- Shareholder Association for Research and Education (Share)
- United Nations Environmental Program Finance Initiative (UNEP FI)

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

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

Trillium has collaborated with UNEP FI in their investor briefings - particularly in the area of carbon accounting.

- United Nations Global Compact
- Other collaborative organisation/initiative, specify

**B-Corp.**

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

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

Trillium has been a long-time supporter of B-Corp. In 2013, our firm was recognized by B Lab as "Best of the Best" for creating positive social and environmental impact.

- Other collaborative organisation/initiative, specify

**GIIN (Global Impact Investing Network)**

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

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

Trillium has supported GIIN since its founding and are members of the organization.

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

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

# Trillium Asset Management

## Reported Information

### Public version

#### Direct - Listed Equity Incorporation

## PRI disclaimer

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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

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

%

80

- Thematic + integration strategies

|  |  |
|--|--|
| Percentage of active listed equity to which the strategy is applied (estimate +/- 10%) | <div style="display: flex; align-items: center;"> <div style="width: 15px; height: 15px; background-color: #0070C0; margin-right: 5px;"></div> <span style="margin-left: 5px;">%</span> </div><br>20 |
|--|--|

- 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.

Our entire stock selection and investment process integrates companies' ESG performance, as we believe companies with a leading or improving ESG focus can help us identify investment opportunities for our clients that generate higher growth and profitability, as well as represent low risk . We utilize screening in order to eliminate companies in certain industries, such as those generating 5% or more of their revenues from firearms, alcohol, tobacco, gaming, or pornography. From a thematic perspective, we have developed two investment strategies: Sustainable Opportunities and Fossil Fuel Free Core. Sustainable Opportunities is a fossil fuel free product, but also focuses on companies demonstrating that they are contributing to three core sustainability themes through their core business: Green Solutions, Economic Empowerment, and Healthy Living.

**(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**

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

## Description

For example, we do not invest in companies that fail the following screens:

≥5% revenue derived from nuclear power

≥5% revenue from non retail sales derived from:

- Firearms
- Alcohol
- Tobacco
- Gaming
- Pornography

≥5% revenue from conventional, chemical or biological weapons

≥1% revenue from nuclear weapons

>0% revenue from manufacturing landmines

Positive/best-in-class screening

### Screened by

Product

Activity

Sector

Country/geographic region

Environmental and social practices and performance

Corporate governance

## Description

Analysts conduct an in-depth industry based analysis to determine which ESG issues are most material (what we call an ESG materiality matrix) and then benchmark company performance.

Norms-based screening

|                 |   |
|-----------------|---|
| <b>LEI 06.2</b> | 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 screening criteria are agreed upon by members of the firm's Investment Management Committee and are reviewed periodically.

Like many investors focused on sustainable and responsible investing (SRI), Trillium's environmental, social, and governance (ESG) criteria attempt to identify the companies best positioned to deliver strong long term financial performance. For this reason, Trillium's ESG research is primarily focused on selecting companies that are meeting positive thresholds of performance for ESG issues, such as strong workplace practices, a demonstrated record of producing safe products for consumers, protecting the environment, fair compensation for employees and executives, and respecting and upholding human rights. We look to reward those companies exhibiting best practices in these areas. In order to reflect the concerns of many SRI investors, Trillium also employs strict exclusionary screens. For example, we will not invest in companies with significant involvement in producing, marketing, or distributing firearms, alcohol, tobacco, gaming, nuclear power, pornography, or military weapons systems.

|               |                  |                      |              |
|---------------|------------------|----------------------|--------------|
| <b>LEI 07</b> | <b>Mandatory</b> | <b>Core Assessed</b> | <b>PRI 1</b> |
|---------------|------------------|----------------------|--------------|

|                 |   |
|-----------------|---|
| <b>LEI 07.1</b> | 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

|               |                  |                    |              |
|---------------|------------------|--------------------|--------------|
| <b>LEI 09</b> | <b>Mandatory</b> | <b>Descriptive</b> | <b>PRI 1</b> |
|---------------|------------------|--------------------|--------------|

|                 |  |
|-----------------|--|
| <b>LEI 09.1</b> | Indicate the type of sustainability thematic funds or mandates that your organisation manages. |
|-----------------|--|

- Environmentally themed funds
- Socially themed funds
- Combination of themes



|                 |  |
|-----------------|--|
| <b>LEI 09.2</b> | Describe your organisation's processes for sustainability thematic funds. [Optional] |
|-----------------|--|

Companies included in our Sustainable Opportunities investment strategy must demonstrate that they are contributing to three core sustainability themes through their core business: Green Solutions, Economic Empowerment, and Healthy Living. The portfolio has no fossil fuel exposure. A group of five investment professionals decides on the list of companies from our internal Buy List that are eligible for investment in this investment strategy.

Our Fossil Fuel Free Core strategy invests across the range of market capitalizations and economic sectors in companies that meet Trillium's sustainability criteria. This strategy has no direct exposure to fossil fuels.

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

|               |                  |                      |              |
|---------------|------------------|----------------------|--------------|
| <b>LEI 11</b> | <b>Mandatory</b> | <b>Core Assessed</b> | <b>PRI 1</b> |
|---------------|------------------|----------------------|--------------|

|                 |   |
|-----------------|---|
| <b>LEI 11.1</b> | Indicate if E, S and G issues are reviewed while researching companies and/or sectors in active strategies. |
|-----------------|---|

| <b>ESG issues</b>    | <b>Coverage/extent of review on these issues</b>  |
|----------------------|---|
| Environmental        | <input checked="" type="radio"/> We systematically review the potential significance of environmental issues and investigate them accordingly<br><input 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 checked="" type="radio"/> We systematically review the potential significance of social issues and investigate them accordingly<br><input 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 checked="" type="radio"/> We systematically review the potential significance of corporate governance issues and investigate them accordingly<br><input 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

|               |                  |                      |                |
|---------------|------------------|----------------------|----------------|
| <b>LEI 18</b> | <b>Mandatory</b> | <b>Core Assessed</b> | <b>PRI 2,6</b> |
|---------------|------------------|----------------------|----------------|

**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.trilliuminvest.com/esg-investment/esg-integration/our-approach-to-integration/>

Provide URL

<http://trilliuminvest.com/wp-content/uploads/2012/05/Trillium-ESG-Criteria.pdf>

**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

# Trillium 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 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 checked="" type="checkbox"/> To encourage improved ESG disclosure<br><input type="checkbox"/> Other, specify<br><input type="checkbox"/> We do not engage via internal staff            |
| <b>Collaborative 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 checked="" type="checkbox"/> To encourage improved ESG disclosure<br><input type="checkbox"/> Other, specify<br><input type="checkbox"/> We do not engage via collaborative engagements |
| <b>Service provider engagements</b>          | <input type="checkbox"/> To support investment decision-making (e.g. company research)<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 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

LEA  
03.2

Describe how you identify and prioritise engagements.

As a firm that has a long history of advocacy and has committed significant resources to corporate engagement, Trillium is able to pursue a large number of engagements and pursue them deeply. Over our 30 years we have worked on a broad range of ESG issues including, but not limited to, Climate Change and Renewable Energy, Environmental Health, Water Scarcity, Animal Welfare, Dams and River Protection, Sustainable Finance, Sustainable Agriculture & Forestry, Access to Healthcare, Workplace Diversity, HIV/AIDS, Indigenous People's Rights, Human Rights, Lesbian, Gay, Bisexual and Transgender Rights, Executive Compensation, Farmworker Rights, Sweatshops & Child Labor, Privacy, Freedom of Speech and the Internet. In other words, we consider the entire range of ESG issues.

Engagement priorities are discussed, set and agreed to by the Advocacy Department with input from and the consent of the Investment Management Committee and the Managing Partners. We look to a number of factors in order to identify and priorities our engagements: (1) financial materiality of the ESG issue for the company; (2) the impact of the issue on the broader economy and markets; (3) the size of Trillium's clients' holdings in the company; (4) the impact of the issue on society and the environment; (5) opportunities to effectuate change and have an impact (i.e. is there a reasonable likelihood that Trillium's action will have an impact in the short, medium or long term).

The bulk of the engagement priorities are identified and set on an annual basis during the summer. However, as discussed below, those priorities and activities are constantly monitored. We also intentionally leave a portion of our resources uncommitted and unprioritized so that we may act on new issues that emerge quickly and warrant prompt action.

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

**Objectives and goals:** Objectives and goals are defined in a number of ways. With respect to shareholder proposals, the objective/goal is clearly articulated in the "resolved clause" of the shareholder proposal. The Advocacy Department, using the factors described in LEA 3.2, develops these goals. Engagements that take the form of inquiry letters or investor statements are similarly formal commitments to specific goals and objectives. Trillium participates in numerous collaborative efforts as described elsewhere in this report that define engagement goals and objectives through those entity's internal processes. Trillium also engages in dialogues with companies that are more open ended and while not structured around a particular goal do provide important opportunities to establish relationships for future goal oriented engagement activities.

**Monitoring:** Trillium monitors its engagement activities using an internal database to record and track all activities. The Advocacy Department holds weekly staff meetings (with regular attendance by research staff) and distributes meeting notes to the entire company on a weekly basis for their review. The Advocacy Department also provides quarterly updates and reviews for the Investment Management Committee and semi-annual reviews for the Managing Partners. Ongoing monitoring of companies we engage with takes the form of regular meetings with the company to follow up on company commitments.

**Escalation or termination of engagement:** Our engagement activities are guided by the five factors described in LEA 3.2. As our understanding and insight into companies evolves in the context of a company's activities and responsiveness to our engagement, as well as to changes in the market, including environmental, social and governance issues, we will recalibrate our engagement.

For example, in 2013 following exceptionally hostile and aggressive tactics take by Range Resources against Trillium, government agencies and community groups, combined with a negative financial outlook for the company, we became increasingly convinced that Range Resources presented a very poor use of our time and resources. Further, we saw little opportunity to create impact or realize increasing shareholder value. As such, we decided to terminate the engagement.

**Insights:** Shareholder advocacy's insights are incorporated into the investment process at a number of well-defined points. On a weekly basis research analysts attend Advocacy Department meetings and advocacy notes are distributed to the entire company. When investment research staff, either on an ad hoc basis or as regularly scheduled, are considering a company or sector, members of the Advocacy Department are formally consulted as part of that process. On a quarterly basis, the Advocacy Department meets with the Investment Management Committee to discuss advocacy engagements, knowledge and insights.

Trillium also provides public transparency and disclosure of activities on our website. This includes a full record of our shareholder proposals going back to 1999 and proxy votes back to 2004. In addition, we provide narrative shareholder advocacy quarterly updates. Finally, we

regularly issue statements and updates discussing our activities.

Evaluation: Trillium evaluates the progress of our engagement activities by identifying the specific and identifiable progress points in each engagement. These can take, for example, the form of votes on shareholder proposals, clear and specific commitments or actions made by companies following our engagement, legislative and regulatory developments, and evidence of our concerns entering public and market debates on an issue.

Capturing/Integrating Lessons: Lessons and experience from engagements are shared by members of the Advocacy Department on a weekly basis and as described elsewhere on a regular basis with Research staff and the Investment Management Committee. Because of the seasonality of shareholder proposal filings, we take the opportunity every summer to reflect upon the previous nine months to identify opportunities to improve and recalibrate our engagement activities.

No

### Process for engagements conducted via collaborations

|          |   |               |       |
|----------|---|---------------|-------|
| LEA 05   | Mandatory   | Core Assessed | PRI 2 |
| LEA 05.1 | Indicate whether your organisation has a formal process for identifying and prioritising collaborative engagements. |               |       |

Yes



|                     |   |
|---------------------|---|
| <b>LEA<br/>05.2</b> | Describe how you identify and prioritise collaborative engagements. |
|---------------------|---|

Collaboration has been ingrained in Trillium's shareholder advocacy work for 30 years.

We regularly collaborate with organizations including Ceres, USSIF, UNPRI, ICCR, IEHN, Open MIC, Global Network Initiative, Conflict Risk Network, Center for Political Accountability and others. We also collaborate with other investors on an ad hoc basis to address issues that have not formally formed into convening entities.

The benefits to Trillium of engaging collaboratively are many. Collaboration allows us to have a greater impact on the companies we engage with because the unified voice of many investors can be more persuasive. We also benefit in collaborative efforts as they increase our understanding of issues through shared knowledge and insights. Collaboration also allows us to work on issues and engage companies that we may not otherwise have sufficient resources to dedicate to. Finally, collaboration offers Trillium a way to exhibit leadership in and to give back to the larger shareholder community.

Trillium was a founding member of Ceres and provided office space for its first staffers. Ceres has been pivotal to Trillium's work on climate change in a variety of ways. Trillium plays a leadership role in developing particular engagement strategies to press fossil fuel companies to reduce its greenhouse gas emissions, energy consumers to reduce energy and procure renewables, and to speak out on public policy efforts.

Trillium also was a founding member of USSIF and currently Trillium's Paul Hilton is the Chair of the Ceres Board.

Trillium's Susan Baker is a board member of ICCR.

No

|               |                  |                      |              |
|---------------|------------------|----------------------|--------------|
| <b>LEA 06</b> | <b>Mandatory</b> | <b>Core Assessed</b> | <b>PRI 2</b> |
|---------------|------------------|----------------------|--------------|

|                     |  |
|---------------------|--|
| <b>LEA<br/>06.1</b> | Indicate if the collaborative engagements in which you are involved have defined objectives. |
|---------------------|--|

- Yes
  - Yes, for all collaborative engagement activities
  - Yes, for the majority of collaborative engagement activities
  - Yes, for a minority of collaborative engagement activities
- No

**LEA 06.2** Indicate if you monitor the actions companies take following your collaborative engagements.

- Yes
  - Yes, in all cases
  - Yes, in the majority of cases
  - Yes, in the minority of cases

**LEA 06.3** Describe how you monitor and evaluate the progress of your collaborative engagement activities.

See LEA 04.3

- No

**General processes for all three groups of engagers**

|               |                  |                              |              |
|---------------|------------------|------------------------------|--------------|
| <b>LEA 10</b> | <b>Mandatory</b> | <b>Gateway/Core Assessed</b> | <b>PRI 2</b> |
|---------------|------------------|------------------------------|--------------|

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

| Type of engagement                             | Tracking engagements  |
|--|---|
| <b>Individual / Internal staff engagements</b> | <input checked="" type="radio"/> Yes, we track the number of our engagements in full<br><input 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 |
| <b>Collaborative engagements</b>               | <input checked="" type="radio"/> Yes, we track the number of our engagements in full<br><input 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 |

**Outputs and outcomes**

|               |                  |                    |              |
|---------------|------------------|--------------------|--------------|
| <b>LEA 13</b> | <b>Voluntary</b> | <b>Descriptive</b> | <b>PRI 2</b> |
|---------------|------------------|--------------------|--------------|

**LEA 13.1** Indicate whether you have a reliable estimate of the number of cases during the reporting year where a company has changed its practices, or made a commitment to do so, following your organisation's and/or your service provider's engagement activities.

- Yes

**LEA  
13.2**

Indicate the number of companies that changed or committed to change in the reporting year following your organisation's and/or your service provider's engagement activities.

|   | <b>Number of company changes or commitments to change</b> |
|---|---|
| Individual / Internal staff engagements | 12  |
| Collaborative engagements               | 6   |

No

Trillium and Christopher Reynolds Foundation Statement on Endo Pharmaceuticals Lobbying Spending Disclosure

<http://www.trilliuminvest.com/news-articles-category/thinking-capital/trillium-and-christopher-reynolds-foundation-statement-on-endo-pharmaceuticals-lobbying-spending-disclosure/>

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34.3% of Men's Wearhouse Shareholders Vote in Favor of Sustainability Reporting Proposal

<http://www.trilliuminvest.com/news-articles-category/thinking-capital/34-3-of-men%E2%80%99s-wearhouse-shareholders-vote-in-favor-of-sustainability-reporting-proposal/>

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Trillium / Calvert Statement on Anglo American's Withdrawal from Pebble Mine Project

<http://www.trilliuminvest.com/news-articles-category/thinking-capital/trillium-calvert-statement-on-anglo-americans-withdrawal-from-pebble-mine-project/>

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FactSet Updates Non-discrimination Policy Following Trillium's Shareholder Engagement

<http://www.trilliuminvest.com/news-articles-category/thinking-capital/factset-updates-non-discrimination-policy-following-trillium%E2%80%99s-shareholder-engagement/>

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Sasol Heeds Community's Call for Environmental Justice in Mossville, LA

<http://www.trilliuminvest.com/news-articles-category/thinking-capital/sasol-heeds-communitys-call-for-environmental-justice-in-mossville-la/>

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Trillium Successfully Withdraws Four Board Diversity Proposals

<http://www.trilliuminvest.com/news-articles-category/thinking-capital/trillium-successfully-withdraws-four-board-diversity-proposals-6/>

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CenturyLink Implements the Most Robust Political Spending Disclosure in the Telecommunications Sector

<http://www.trilliuminvest.com/news-articles-category/thinking-capital/centurylink-implements-the-most-robust-political-spending-disclosure-in-the-telecommunications-sector/>

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AT&T Takes a Small Step Toward Net Neutrality

<http://www.trilliuminvest.com/uncategorized/att-takes-a-small-step-toward-net-neutrality/>

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Heinz Discloses its Supply Chain Impact on Deforestation

<http://www.trilliuminvest.com/uncategorized/heinz-discloses-company%E2%80%99s-supply-chain-impact-on-deforestation/>

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W.W. Grainger Adds Gender Identity and Expression Language to its Equal Opportunity Employment Guidelines

<http://www.trilliuminvest.com/uncategorized/w-w-grainger-adds-gender-identity-and-expression-language-to-its-equal-opportunity-employment-guidelines/>

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## 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

please provide URL

<http://www.trilliuminvest.com/esg-investment/esg-impact/shareholder-advocacy-public-policy/>

please provide URL

<http://www.trilliuminvest.com/news-articles-category/thinking-capital/trillium%E2%80%99s-2013-corporate-engagement-highlights/>

LEA  
15.2

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

Yes

LEA  
15.3

Indicate what engagement information your organisation proactively discloses to clients/beneficiaries and/or the public.

## Engagement information disclosed

- 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

<http://www.trilliuminvest.com/news-articles-category/thinking-capital/trillium%E2%80%99s-2013-corporate-engagement-highlights/>

**LEA  
15.4**

Indicate how frequently you typically report engagements information.

- Disclosed continuously (prior and post engagements)
- Disclosed quarterly
- Disclosed annually
- Disclosed every two years or less
- Other, specify

We disclose information continuously, through quarterly updates, and annual updates.

No

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

**LEA 17**

**Mandatory**

**Descriptive**

**PRI 2**

**LEA  
17.1**

Indicate how you typically make your (proxy) voting decisions and what this approach is based on.

#### Approach

- We use our own research or voting team and make our own voting decisions without the use of service providers.
- We hire service provider(s) which make voting recommendations or provide research that we use to inform our voting decisions.
- 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.

Based primarily on

- the service provider voting policy signed off by us
  - our own voting policy
  - our clients requests or policy
  - other, explain
- We hire service provider(s) which make voting decisions on our behalf.

|        |           |             |       |
|--------|-----------|-------------|-------|
| LEA 18 | Mandatory | Descriptive | PRI 2 |
|--------|-----------|-------------|-------|

|          |   |
|----------|---|
| LEA 18.1 | Of the voting recommendations that your service provider made in the reporting year, indicate what percentage your organisation reviewed, and the reasons for the review. |
|----------|---|

**Percentage of voting recommendations your organisation reviewed**

- >20%
- 5-20%
- 1-5%
- <1%

**Reasons for review**

- Specific ESG issues
- Votes where a significant level of ownership is held
- Votes against management or abstentions
- Conflicts of interest
- Corporate actions such as M&A, disposal, etc.
- Other, explain

|        |           |               |       |
|--------|-----------|---------------|-------|
| LEA 21 | Mandatory | Core Assessed | PRI 2 |
|--------|-----------|---------------|-------|

|          |   |
|----------|---|
| LEA 21.1 | 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 publicly disclose our proxy voting decisions and rationale.  
<http://www.trilliuminvest.com/esg-investment/esg-impact/shareholder-advocacy-public-policy/proxy-voting-2/>

## 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%) |
|--------------------------------|

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

100

|  |
|--|
| 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

|             |
|-------------|
| provide URL |
|-------------|

<http://www.trilliuminvest.com/esg-investment/esg-impact/shareholder-advocacy-public-policy/proxy-voting-2/>

|             |
|-------------|
| provide URL |
|-------------|

<http://www.trilliuminvest.com/esg-investment/esg-impact/shareholder-advocacy-public-policy/resolutions-by-year/>

|          |   |
|----------|---|
| LEA 26.2 | Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries. |
|----------|---|

Yes



**LEA  
26.3**

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

Indicate how much of your voting record you disclose

- All voting decisions
- Some voting decisions
- Only abstentions and opposing vote decisions
- Summary of votes only

Indicate what level of explanation you provide

- Explain all voting decisions
- Explain some voting decisions
- Only explain abstentions and votes against management
- No explanations provided

**LEA  
26.4**

Indicate how frequently you typically report voting information.

- Continuously (primarily before meetings)
  - Continuously (soon after votes are cast)
  - Quarterly or more frequently
  - Between quarterly and annually
  - Less frequently than annually
  - Other, specify
- No
- We disclose it to clients/beneficiaries only
  - We do not proactively disclose our voting activities to the public and/or to clients/beneficiaries