



# PRI REPORTING FRAMEWORK 2018 Indirect — Manager Selection, Appointment and Monitoring

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reporting@unpri.org

+44 (0) 20 3714 3187



### **Understanding this document**

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

#### Top bar

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

	Indicator status	Purpose	Principle
xxx 01	MANDATORY	CORE ASSESSED	PRI 2

#### Indicator status

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

#### Purnose

Fulpose		
Gateway	•	The responses to this indicator 'unlock' other indicators within a module if they are relevant for your organisation. Please refer to the logic box for more information.
Peering		These indicators are used to determine your peer groups for assessment purposes.
Core assessed	*	These indicators form the core of the assessment and represent the majority of your final assessment score.
Additional assessed	<b>*</b> *	These indicators represent more advanced or alternative practices and account for a smaller part of your score.
Descriptive		These are open-ended narrative indicators, allowing you to describe your activities.

#### Underneath the indicator

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

xxx 01	EXPLANATORY NOTES
xxx 01.1 xxx 01.2	This provides guidance on how to interpret the sub-indicators, including examples of what could be reported.
LOGIC	
xxx 01	This explains when this indicator is applicable and/or if it has an impact on subsequent indicators. If there is no logic box, the indicator is always applicable and does not affect other indicators.
ASSESSMENT	
xxx 01	This provides a brief overview of the pilot assessment approach for this indicator.

xxx 01	DEFINITIONS
xxx 01	Definitions of specific terms that are used in the indicator are defined here.

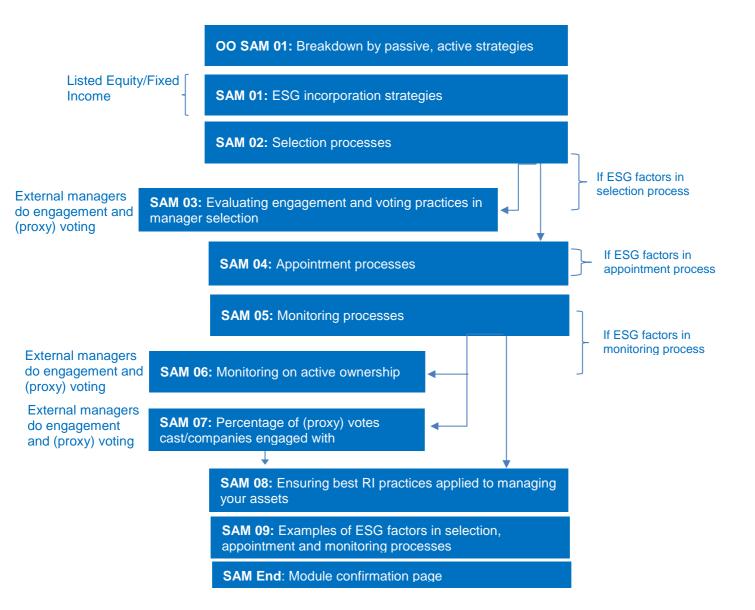


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# Pathways through the module





#### **Preface**

This module is designed for investors who outsource some or all of their investment activities to external investment managers. Pension funds, insurance companies, sovereign wealth funds, foundations and endowments are frequently indirect investors, although they may also have direct investments. Investment managers may also outsource some of their investment activities (e.g. in multimanager or fund-of-fund structures) and those assets should be reported in this module.

Investors who have externally managed listed equities but engage and/or vote in-house, or who instruct specialist service providers to vote and/or engage on their behalf, should report these active ownership activities within the 'Listed Equity Active Ownership (LEA)' module. Indicators on engagement and (proxy) voting in this module will only be displayed in the online tool if you indicate that your external managers perform these functions (SAM 05).

Investors who hire asset consultants (and/or fiduciary managers) to support them in selecting, appointing and monitoring external managers will also be able to report their own or their asset consultant's responsible investment activities here.

This module focuses primarily on the broad processes in place for selecting, appointing and monitoring external managers. It has three specific pathways:

- one for equity and debt asset classes for which there is a direct module in the Reporting Framework, i.e., listed equities (LE), fixed income SSA, corporate (financial), corporate (non-financial) and fixed income securitised;
- one for non-listed asset classes, for which there is a direct module in the Reporting Framework, i.e. private equity (PE), property (PR) and infrastructure (INF); and
- one for the remaining assets not currently captured by other direct modules.

Some indicators and reporting options are broken down by asset class, e.g. indicator SAM 06 by listed equity, fixed income SSA, corporate (financial), corporate (non-financial) fixed income and fixed income securitised. In these cases, you will be able to choose to report separately by each individual asset class and explain any specific implementation differences between asset classes in open-ended indicators.

To support you in reporting to this module, the PRI has developed a tool to help you collect information from your consultant(s) and fiduciary manager: <u>link</u>.

\*Note 1: While retail banks and fund-of-fund investors may also be classed as indirect investors, their characteristics differ in some areas from the organisations covered in this module. A separate module for these investors may be developed by the PRI in the future. Until then, these investors should report using this module and use the open-ended indicators to explain how they implement responsible investment.

\*Note 2: Inclusive Finance. There is a separate module for indirect investors in Inclusive Finance (IFI). This module is mandatory to report for signatories to the Principles for Investors in Inclusive Finance (PIIF) and voluntary for all other investors holding inclusive finance assets.



# **Summary of updates**

The SAM module was redeveloped in 2016 and signatories reported on the new version for the first time during the 2017 reporting cycle. With feedback received during this cycle, a few amendments have been made to this 2018 version. Prefilling will be available for indicators that did not change significantly since last year.

The revised SAM module offers more targeted indicators to drive the following:

- asset owner (AO) movement from awareness of ESG considerations to creating impact via their managers and mandates
- incorporation of ESG characteristics into investment strategy;
- a shift from reliance on qualitative dialogue between AOs and investment managers (IMs) to quantified, positive ESG impact in AO-IM collaboration;
- a clearer link between the ESG position at a portfolio level and the impacts (such as return and risks);
- increased understanding of the role of asset consultants, and data capture on consultant selection practices in ESG context;
- signatory education on how AOs reward ESG incorporation and thus encourage improved practices.

2017 Indicator	Update summary
SAM 01, 11, 13	Moved to the SG module
SAM 02	Deleted
SAM 03	Moved to the OO module
SAM 04 – 10, 12	Renumbered and sub-indicators have been reworded and/or deleted

To view a detailed summary of changes to the module, please click here.



#### SECTION

# Listed equity (LE) and Fixed income (FI)

# OVERVIEW

SAM 01 Indicator status Purpose Principle DESCRIPTIVE PRI 1

0.1104	INDICATOR								
SAM01	INDICATOR								
SAM 01.1	Indicate which of the following ESG incorporation strategies you require your external manager(s) to implement on your behalf for <b>all</b> your listed equity and/or fixed income assets:								
		All assets	LE	Fixed income —SSA	Fixed income — Corporate (financial)	Fixed income — Corporate (non-financial)	Fixed income — Securitised		
	Active investment strategies								
	Screening								
	Thematic								
	Integration								
	None of the above								
	Passive investment strategies								
	Screening								
	Thematic								
	Integration								
	None of the above								
SAM 01.2	Additional informat	ion							



SAM 01	EXPLANATORY NOTES
SAM 01.1	Please report the strategies your require your managers to implement for all your listed equity and/or fixed income assets, not just those that are ESG-specific funds or products.  For listed equities and/or fixed income, signatories may choose not to address ESG factors because of the characteristics of a specific investment strategy.  Moreover, both in active and passive strategies, ESG incorporation may be done by one or more strategies. These are explained clearly in the definition section.
LOGIC	
	Your response to [OO SAM 01.1] determines which parts of indicator [SAM 01.1] are applicable; the SAM 01.1 indicator has Active and Passive investment strategy sections.
SAM 01	For example, if you report using passive investment strategies in relation to Listed Equity in [OO SAM 01.1], you will only see the part of [SAM 01.1] that is relevant to passive investment strategies for Listed Equity.

SAM 01	DEFINITIONS

#### **ESG** incorporation

Incorporation of ESG factors into investment analysis and decision-making processes is covered in Principle 1 of the PRI. Throughout the Reporting Framework, we refer to ESG incorporation as the review and use of ESG information in the investment decision-making process.

The Reporting Framework addresses four ways in which ESG incorporation can be done:

- 1. screening;
- 2. sustainability themed investment (also called environmentally and socially themed investment);
- 3. integration; and/or
- 4. a combination of the above.

Assets subject to an engagement approach only and not subject to any of the above strategies should not be included in ESG incorporation.

To improve standardisation and communication in the responsible investment industry, the PRI has aligned its definitions with those of the <u>Global Sustainable Investment Alliance</u>. These are presented below for convenience.

below for convenience	•					
	The definitions of the three types of screening in the Reporting Framework are as follows:					
	<ul> <li>a. negative/exclusionary screening: The exclusion from a fund or portfolio of certain sectors, companies or practices based on specific ESG criteria;</li> </ul>					
Screening of	b. positive/best-in-class screening: Investment in sectors, companies or projects selected for positive ESG performance relative to industry peers; and/or					
investments	<ul> <li>norms-based screening: Screening of investments against minimum standards of business practice based on international norms. Norms-based screening involves either of the following:</li> </ul>					
	defining the investment universe based on investees' performance on international norms related to responsible investment/ESG factors; or					



	<ol> <li>excluding investees from portfolios after investment if they are found following research, and sometimes engagement, to contravene these norms. Such norms include but are not limited to the UN Global Compact Principles, the Universal Declaration of Human Rights, International Labour Organization standards, the United Nations Convention Against Corruption and the OECD Guidelines for Multinational Enterprises.</li> </ol>
Thematic/ sustainability themed investing	Investment in themes or assets specifically related to sustainability (for example, clean energy, green technology and sustainable agriculture).
Integration of ESG factors	The systematic and explicit inclusion by investment managers of environmental, social and governance factors into traditional financial analysis.

For further detail on these definitions, please see separate Main Definitions document.

#### Investment decision-making processes

For the purposes of the Reporting Framework, investment decision-making processes refers to research, analysis and other processes that lead to a decision to make or retain an investment (i.e. to buy, sell or hold a security) or to commit capital to an unlisted fund or other asset.

(Proxy) voting decisions and engagement activities are not classified as investment decisions for the purposes of the Reporting Framework. These decisions fall under Principle 2 of the PRI, relating to active ownership, and within the Listed Equity—Active Ownership (LEA) module of the Framework.





SAM 02 Indicator status Purpose CORE ASSESSED / ADDITIONAL ASSESSED

Principle PRI 1

SAM 02	INDICATOR							
SAM 02.1	Indicate what RI-related information your organisation typically covers in the majority of selection documentation for your external managers							
		All assets	Asset class 1	Asset class 2	Asset class 3	Asset class 4	Asset class 5	
	Your organisation's investment strategy and how ESG objectives relate to it							
	ESG incorporation requirements							
	ESG reporting requirements							
	Other							
	No RI information covered in the selection documentation							
SAM 02.2	Explain how your organisation evaluates the investment manager's ability to align between your investment strategy and their investment approach							
		All assets	Asset class 1	Asset class 2	Asset class 3	Asset class 4	Asset class 5	
	Strategy							
	Assess the time horizon of the investment manager's offering vs. your/beneficiaries' requirements							
	Assess the quality of investment policy and its references to ESG							
	Assess the investment approach and how ESG objectives are implemented in the investment process							



Review the manager's firm-level vs. product-level approach to RI					
Assess the ESG definitions to be used					
Other, specify					
None of the above					
ESG people/oversight					
Assess the ESG expertise of investment teams					
Review the oversight and responsibilities of ESG implementation					
Review how ESG implementation is incentivised					
Review the manager's RI-promotion efforts and engagement with the industry					
Other, specify					
None of the above					
Process/portfolio cons	truction/ir	vestment val	uation		
Review the process for ensuring the quality of ESG data used					
Review and agree the use of ESG data in the investment decision making process					
Review and agree the impact of ESG analysis on investment decisions					
Review and agree ESG objectives (e.g. risk reduction, return seeking, real-world impact)					
Review and agree manager's ESG risk framework		٥			
Review and agree ESG risk limits at the portfolio level (portfolio construction) and other ESG objectives					



	Review how ESG materiality is evaluated by the manager						
	Review process for defining and communicating on ESG incidents						
	Review and agree ESG reporting frequency and detail					٥	
·	Other, specify						
	None of the above						
SAM 02.3	Indicate the selection pro	cess and i	ts ESG/RI con	nponents			
	☐ Review ESG/RI respo	nses to Rff	P, RfI, DDQ et	C.			
	☐ Review responses to F Questionnaire (LP DDQ)	PRI's Limite	ed Partners' R	esponsible I	nvestment Due	e Diligence	
	☐ Review publicly availa and processes	ble informa	ation on ESG/F	RI□ Review	assurance pro	cess on ES	SG/RI data
	☐ Review PRI Transpare	ency Repoi	rts				
	☐ Request and discuss F		•				
	☐ Meetings with the pote		_	rs covering E	SG/RI themes	3	
	☐ Site visits to potential i	nanagers	Offices				
	□ Other, specify						
		When selecting external managers does your organisation set or use any of the following:					
SAM 02.4		managers	does your org	anisation set	or use any of	the following	ng:
SAM 02.4		managers All ass	Assa	t Asse	t Asset	Asset class	Asset
SAM 02.4			Sots Asse	t Asse	t Asset	Asset class	Asset
SAM 02.4	When selecting external	All ass	sets Asse	t Asse 1 class	Asset class	Asset class 4	Asset class 5
SAM 02.4	When selecting external ESG performance development targets	All ass	sets Asse	t Asse	Asset class 3	Asset class 4	Asset class 5
SAM 02.4	When selecting external  ESG performance development targets  ESG score	All ass	sets Asse	t Asse	t Asset class 3	Asset class 4	Asset class 5
SAM 02.4	When selecting external  ESG performance development targets  ESG score  ESG weight	All ass	sets Asse class	t Asse	Asset class 3	Asset class 4	Asset class 5
SAM 02.4	When selecting external  ESG performance development targets  ESG score  ESG weight  Real economy targets	All ass	sets Asse class	t Asse	Asset class 3	Asset class 4	Asset class 5
SAM 02.4	ESG performance development targets  ESG score  ESG weight  Real economy targets  Other RI considerations  None of the above  Describe how the ESG in process.	All ass	sets Asse class	t Asse class	t Asset class 3	Asset class 4	Asset class 5
	ESG performance development targets  ESG score  ESG weight  Real economy targets  Other RI considerations  None of the above  Describe how the ESG in	All ass	sets Asse class	t Asse class	t Asset class 3	Asset class 4	Asset class 5



SAM 02	EXPLANATORY NOTES
	This indicator is aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations.
	This indicator seeks information about the typical processes in place and actions taken by your organisation during manager selection (even if managers have not been selected or reappointed during the reporting year). If these processes are implemented only in a minority of cases, do not report them here in the pre-selected options, but do describe these cases in the Additional Information field at the end of this indicator.
SAM 02	Here is some further guidance on some of the processes your selection may cover.
OAM 02	For examples of how asset owner signatories are incorporating ESG considerations into their selection, appointment and monitoring of external managers, see <u>Aligning Expectations: Guidance for asset owners on incorporating ESG factors into manager selection, appointment and monitoring by the PRI, February 2013.</u>
	And
	Crafting an investment strategy – a process guidance for asset owners
	Selection documentation can include RFPs, RFI, DDQ and other questionnaires and selection surveys, Investment and Operational Due Diligence processes.
SAM 02.1	Select 'Investment strategy and how ESG objectives relate to it' if your organisation includes your investment strategy, components of it, investment beliefs or principles in the selection documentation. This can also include explanation as to how your organisation's investment strategy links to your ESG objectives.
	The options containing the wording 'Review and agree' refer to reviewing a certain aspect of the potential investment manager's approach and concluding that this approach is sufficiently enough aligned with your own beliefs, strategy and policy.
	'Assess the time horizon of the investment manager's offering vs. your/beneficiaries' requirements' — this also includes assessing how the time horizon fits with your organisation's ESG objectives and how it's reflected with the investment managers' portfolio turnover rate.
	'Assess the quality of the investment policy' – this could mean reviewing the references to ESG, the coverage of the policy in terms of regions, products, strategies and asset classes also understanding how any changes in the policy are implemented.
	'Review the manager's firm-level vs. product-level approach to RI' – this can include ensuring that the top-level ESG strategy of the firm is consistent with how the manager is implementing ESG on a product-level.
	'Assess the ESG definitions to be used' can also include discussions of the scope of what is understood with ESG and what it entails. 'Review how ESG implementation is enforced /ensured' – this could mean ensuring availability for training on ESG.
SAM 02.2	'Review the RI-promotion and engagement with the industry to enhance RI implementation' – The investment manager might for instance be providing or supporting education or training on RI to clients, consultants and other stakeholders, encouraging better transparency and disclosure of RI practices across the industry, speaking publicly at events and conferences to promote RI, supporting academia on RI research etc.
	'Review and agree the investment decision making process' – understanding how ESG is integrated in the decision-making, asking for a recent example for when ESG factors influenced an investment decision. Also important to understand – who makes a decision – a committee, individual, algorithm, or another party.
	'Assess ESG expertise of investment teams' - understand if there is an ESG team, specialists or if ESG function is integrated throughout the investment team. If there is a separate ESG team – review where is it based and how it works together with the rest of the organisation. If ESG responsibilities are integrated throughout the teams – understand how the team is trained and recruited to ensure that they have the ESG skills and competencies. This may include a discussion of, for example, any differences between mandates, strategies or markets.
	' Review and agree the impact of ESG analysis on investment decisions' - Understanding the investment process – is the investment manager using fundamental analysis or thematic, this



determines how ESG materiality is identified, and is the process driven by qualitative or quantitative factors

Review and agree ESG objectives (e.g. risk reduction, return seeking, real-world impact)'— This could include identifying the ESG areas that your organisation wants to prioritise and what the desired outcome is within the given investment horizon, and then agreeing how this should be linked with the investment manager's investment strategy, investment policy, investment process, and performance review. ESG objectives could include ESG risk reduction, exclusions, ESG considerations in the investment decision making process and other integration objectives, particular ESG related outcomes and real-world impact, emissions reductions or similar.

'Review and agree manager's ESG risk framework' – understanding how the manager identifies, measures and manages ESG risk

'Review and agree ESG risk limits at the portfolio level (portfolio construction) and other ESG '-looking at how investment manager sees ESG returns and risk and if there is an additional ESG objective, assessing if and what is the ESG contribution to risk-return profile of the portfolio *Investment Policy: Process & Practice – A Guide for Asset Owners* can be found here.

Meetings with the potential shortlisted managers can include video conference and other multimedia meetings.

Site visits to potential managers' offices can also be done through a third party and/or during the appointment phase.

#### **SAM 02.3**

'Review assurance process' refers to reviewing the assurance process that the investment manager applies to its financial or other reports. Reviewing this process would ideally result in you as an organisation being more confident in the data and information that the investment manager presents to you.

PRI's Limited Partners' Responsible Investment Due Diligence Questionnaire (LP DDQ) can be found here.

LOGIC						
SAM 02	This indicator is applicable for (asset classes) where:  • You selected (asset class) in OO 11.2 (your organisation/your investment consultants address ESG incorporation or active ownership in your external manager selection, appointment and/or monitoring), or:  • You selected (asset class) in OO 12.1 (you do RI implementation via external managers)					
ASSESSME	ENT					
SAM 02	· ·	Maximum score: 18 ★ per asset class.  Please note that SAM 02.2 is worth up to 9 ★, of which 6 ★ are core and 3 ★ are additional.				
	Indicator scoring methodolog	ду				
	Selected response	Level score	Further Details			
	Core Assessed					
	SAM 02.1					
	"No RI information covered in the RFPs"					
	One option selected	*				



_							
	Two options selected	**					
	Three options or more selected	***					
	Core Assessed						
	SAM 02.2 - Strategy						
	"None of the above" selected	0					
	One option selected	*					
	Two options selected	**					
	Three options or more selected	***					
	Core Assessed						
	SAM 02.2 – ESG people/overs	ight					
	"None of the above" selected	0					
	One option selected	*					
	Two options selected	**					
	Three options or more selected	***					
	Additional Assessed						
	SAM 02.2 - Process/portfolio	construction/investment valuat	ion				
	"None of the above" selected	0					
	One or two options selected	*					
	Three or four options selected	**					
	Five or more options selected	***					
	Core Assessed						
	SAM 02.3						
	One option selected	*					
	Two options selected	**					
	Either "Meetings with the potential shortlisted managers" or "Site visits to potential managers offices" selected	***					
	Additional Assessed						
	SAM 02.4						



"None of the above"	0	
Any option selected	***	

DEFINITIONS	
ESG objectives	This could be adhering to code of conducts, beliefs, strategy, policy etc.; investment restrictions; integration practices; engagement; voting; reporting.
Investment strategy	An investment strategy is a systematic plan that guides a financial institution's investment decisions. This may include asset allocation, buy and sell guidelines and risk guidelines such as ESG risks. This can also include investment beliefs understood as a financial institution's key convictions about how financial markets work, while considering human behaviour. This may include investment process beliefs, organisational beliefs and ESG beliefs.
Real economy targets	The extent to which an investment positively or negatively impacts the real economy, including environment, social and governance impacts, additionally to financial return.

SAM 03 Indicator status Purpose Principle
ADDITIONAL ASSESSED PRI 2

SAM 03	INDICATOR						
SAM 03.1	Indicate how your organi majority of the manager			the manage	er's active ow	nership prac	tices in the
		All assets	Asset class 1	Asset class 2	Asset class 3	Asset class 4	Asset class 5
	Engagement						
	Review the manager's engagement policy						
	Review the manager's engagement process (with examples and outcomes)		٥				
	Ensure whether engagement outcomes feed back into the investment decisionmaking process						
	Other engagement issues in your selection process; specify			٥		٥	
	None of the above			_	_		
	(Proxy) voting						
	Review the manager's voting policy			n/a	n/a	n/a	n/a
	Review the manager's ability to align voting activities with clients' specific voting policies			n/a	n/a	n/a	n/a
	Review the manager's process for informing clients about voting decisions			n/a	n/a	n/a	n/a
	Ensure whether voting outcomes feed back into the investment decision-making process		٥	n/a	n/a	n/a	n/a



	Review the number of votes cast as a percentage of ballots/AGMs or holdings and available rationale			n/a	n/a	n/a	n/a
	Other voting issues in your selection process; specify		٥		۵	٥	
	None of the above						
SAM 03.2	Describe how you asses	s if the mana	ager's engag	ement appro	ach is effect	ive.	
	<ul> <li>□ Impact on investment decisions</li> <li>□ Financial impact on target company or asset class</li> <li>□ Impact on ESG profile of company or the portfolio</li> <li>□ Evidence of changes in corporate practices (i.e. ESG policies and implementation activities)</li> <li>□ Other, specify</li> <li>□ None of the above</li> </ul>						otivities)
SAM 03.3	Describe how you assess if the manager's voting approach is effective/appropriate						
	<ul> <li>☐ Impact on investment decisions</li> <li>☐ Impact on ESG profile of company or the portfolio</li> <li>☐ Evidence of changes in corporate practices (i.e. ESG policies and implementation activities)</li> <li>☐ Other, specify</li> <li>☐ None of the above</li> </ul>						
SAM 03.4	Additional information						
	[OPTIONAL]						

SAM 06	EXPLANATORY NOTES
	This indicator seeks information about the typical processes in place and actions taken by your organisation during manager selection focusing specifically on engagement and voting practice. Report here also if you require your managers to report on any of the options.
SAM 03	Review the manager's engagement process discussing in what situations the manager engages. Request examples and outcomes. Review how the engagement outcomes feed back into the investment decision-making process.
	PRI's <u>Crafting an investment strategy – a process guidance for asset owners provides guidance on how asset owners might evaluate a manager's active ownership processes</u>



LOGIC			
SAM 03	[SAM 03] is applicable if you report requiring external ma	nagers to engage or	r vote in [OO 10.1]
SAM 03.1	The engagement section of this indicator is applicable if in the Organisational Overview module, OO 10.1, it was reported for either Listed Equity or Fixed Income: 'We require our external managers to engage'.  • The Listed Equity column of table SAM 03.1 will apply if the above apples to Listed Equity  • The Fixed Income (SSA) column of table SAM 03.1 will apply if the above apples to Fixed Income (SSA)  (and so on for the other Fixed Income types)		
	The voting section of this indicator is applicable if in the it was reported that for Listed Equity - voting row: "We r behalf".		
SAM 03.2	This indicator is applicable if in the Organisational Ove either Listed Equity or Fixed Income: "We require our e		
SAM 03.3	This indicator is applicable if in the Organisational Ove for Listed Equity - voting row: "We require our external		
ASSESSME	ENT		
SAM 03	Maximum of twelve ★ per asset class (maximum of nir	ne ★ for Fixed Incom	ne)
Scored sub- indicator	SAM 03.1 – Indicate how your organisation typically practices in the majority of the manager selection process.		
	Indicator scoring methodology		
	Selected response	Level score	Further Details
	Engagement		
	"None of the above" selected	0	
	One option selected	*	
	Two options selected	**	
	Three options or more selected	***	
	Proxy voting (not applicable for Fixed income – SS Fixed income – corporate (non-financial) and Fixed		
	"None of the above" selected	0	
	One option selected	*	
	Two options selected	**	
	Three options or more selected	***	
Scored sub- indicator	SAM 03.2 – Describe how you assess if the manager's	s engagement appro	ach is effective



	Indicator scoring methodology		
	Selected response	Level score	Further Details
	"None of the above" selected	0	
	One option selected	*	
	Two options selected	**	
	Three options or more selected	***	
Scored sub- indicator	SAM 03.3 – Describe how you assess if the manager's	voting approach is e	ffective/appropriate
	Indicator scoring methodology		
	Selected response	Level score	Further Details
	"None of the above" selected	0	
	One option selected	*	
	Two options selected	**	
	Three options or more selected	***	

#### **APPOINTMENT**

SAM 04	Indicator status MANDATORY	Purpose  CORE ASSESSED/ADDITIONAL ASSESSED	Principle PRI 1
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SAM 04	INDICATOR							
SAM 04.1	Indicate if in the majority of cases and where the structure of the product allows, your organisation does any of the following as part of the manager appointment and/or commitment process							
	☐ Sets standard benchmarks or ESG benchmarks							
	□ Defines ESG objectives							
	☐ Sets incentives and controls link	ed to the ESG objectives						
	☐ Requires reporting on ESG object	ctives						
	□ Requires the investment manager to adhere to ESG guidelines, regulations, principles or standards							
	☐ None of the above							
	☐ None of the above, we invest only in pooled funds and have a thorough selection process							
SAM 04.2	Provide an example per asset class in your managers' appointment.	s of your benchmarks, object	ctives, incentives/controls and reporting req	uirements that would typ	ically be included			
	Asset class Benchmark ESG Objectives Incentives and Reporting controls requirement							
	<ul> <li>All</li> <li>Applicable from SAM 03 [drop down]</li> <li>Standard benchmark</li> <li>ESG related strategy, specify</li> <li>ESG related investment restrictions, specify</li> </ul>							



		O We do not set benchmarks	□ ESG integration, specify □ Engagement, specify □ Voting, specify □ Promoting responsible investment □ ESG specific improvements □ ESG guidelines/regulation, principles/standards, specify □ Other, specify □ We do not define ESG objectives	☐ Communication and remedy of breaches ☐ Termination ☐ No fee/ breach of contract ☐ We do not set incentives and controls	O Annually O Ad-hoc/when requested O We do not require the reporting on ESG objectives			
	[same as above]	[same as above]	[same as above]	[same as above]	[same as above]			
	[same as above]	[same as above]	[same as above]	[same as above]	[same as above]			
SAM 04.3	If none of the above, describe any other mechanisms in place to set expectations as part of the appointment or commitment process.							
S 6 116								
SAM 04.4	Indicate which of these actions your organisation might take if any of the ESG requirements are not met							
	☐ Discuss requirements not met ar	nd set project plan to rectify	1					
	☐ Place investment manager on a	"watch list"						
	☐ Track and investigate reason for	non-compliance						
	☐ Re-negotiate fees							
	☐ Failing all actions, terminate con	tract with the manager						
	Other, specify							
	□ No actions are taken if any of the ESG requirements are not met							

SAM 04.5	Provide additional information relevant to your organisation's appointment processes of external managers.  [OPTIONAL]

SAM 04	EXPLANATORY NOTES
	Standard benchmark – select this option if your organisation sets benchmarks against mainstream Index products such as the MSCI WORLD, MSCI ACWI, MSCI Emerging Markets, SP500, FTSE100, DAX, EuroStoxx600, Nikkei225, Topix, Iboxx, and Barclays Composite bond index. For absolute return investors that might be Libor + 300Bps, 5%, 8% or any other hurdle rate. A combination of several indexes would still fall within this category.
	ESG benchmark – select this option if your organisation sets ESG benchmark using indexes with the ESG consideration in its securities selection or weighting. Examples include MSCI range of ESG indexes, FTSE/RUSSEL ESG Index Range, DOW JONES/Robecco SAM sustainable range.
	ESG objectives are usually part of the Investment Management Agreement (IMA) for separate mandates, the GP/LP Agreement for Private Equity type pools and in Side Letters in all other cases. This allows additional ESG requirements to become contractually binding in the relationship between an asset owner and an investment manager.
SAM 04	ESG objectives: strategy – this could include objectives to adhere to Codes of Conduct, your organisation's investment strategy, investment policy and/or statement of beliefs and similar strategy / governance documents. An active ownership objective could be to execute engagement/voting activities by following your organisation's engagement/voting policy or specific ESG position.
	ESG specific improvements – objectives might include that the investment manager puts in place an RI policy, undergoes training on ESG and similar.
	Incentives and controls: Fee based incentive – select this option if your organisation has a positive incentive (higher fees) or negative incentive (not full amount of standard fees) based on the manager's ESG performance.
	Termination – select this option if your organisation would be terminating investment manager's contract or if your organisation would not be bound by private equity commitments (become an excused investor in to a pulled vehicle) if ESG objectives are not met.
	Communication and remedy of breaches – communication that a breach of contract/agreement has occurred and establish actions to remedy the breach
	No fee/ breach of contract – select this option if your organisation would pay no fees, recover fees already paid or would terminate the contract with the manager if ESG objectives are not met.

SAM 04.3			above' options in SAM 04.1. Use this indicator to describe other mechanisms in place in the nay for example be informally setting expectations through conversations and relationship			
LOGIC						
SAM 04	The asset classes presented in SAM 04.2 will be influenced by which asset classes you reported in OO SAM 01.1 or OO 11.2  [SAM 04] will be applicable if you report 'Appointment' for the relevant external asset class in OO 11.2.  [SAM 04.2] is triggered by SAM 04.1 if you select any of the options (excluding "None of the above")  [SAM 04.3] is triggered if you report either of the "None of the above" options in SAM 04.1					
ASSESSMI	ENT					
	Indicator scoring methodology					
	Selected response	Level score	Further Details			
	Core Assessed					
	SAM 04.1					
	"None of the above" or "None of the above, we invest only in pooled funds and have a thorough selection process" selected	0				
	One option selected	*				
	Two options selected	**				
	Three or four options selected	***				
	SAM 04.2					
	No example provided	0				
	Example provided	***				

	Additional Assessed				
	SAM 04.4				
	"None of the above" selected	0			
	One option selected	*			
	Two options selected	**			
	Three or more options selected	***			

Examples	Examples							
Asset class	Benchmark	Objectives	Incentives and controls	Reporting requirements				
Property	☑ Standard benchmark, specify "Liber + 6%"	☑ Integration, specify "Improving energy efficiency by 5% of the buildings"	☑ Fee based incentive	Annually				
Listed equity	☑ ESG benchmark, specify "MSCI World ESG"	✓ Voting, specify "the asset owner is retaining the rights of all corporate actions and voting issues in accordance to its ESG policies. In lieu of asset owner's instructions the manager is going to vote according to asset owner's voting policy"  ✓ Engagement, specify "The asset owner retains the right to engage directly with any of the companies in the investment portfolio and the investment manager will be required to facilitate the interaction."	☑ Termination	• Quarterly				



SAM 05 Indicator status Purpose Principle CORE ASSESSED PRI 1

SAM 05	INDICATOR						
SAM 05.1	When monitoring managinformation your organism				s of respons	ible investr	nent
		All assets	Asset class 1	Asset class 2	Asset class 3	Asset class 4	Asset class 5
	ESG objectives linked to investment strategy (with examples)						
	Evidence on how the ESG incorporation strategy(ies) affected the investment decisions and financial / ESG performance of the portfolio/fund						
	Compliance with investment restrictions and any controversial investment decisions						
	ESG portfolio characteristics						
	How ESG materiality has been evaluated by the manager in the monitored period						
	Information on any ESG incidents						
	Metrics on the real economy influence of the investments						
	PRI Transparency Reports						
	PRI Assessment Reports						
	RI-promotion and engagement with the industry to enhance RI implementation						
	Other general RI considerations in investment						



	management agreements; specify							
	None of the above	٥		n/a	n/a	n/a	n/a	
SAM 05.2	When monitoring external managers, does your organisation set any of the following to measure compliance/progress:							
	ESG score or assessment							
	ESG weight							
	ESG performance minimum threshold							
	Real economy targets							
	Other RI considerations							
	None of the above							
SAM 05.3	Provide additional inform managers. [OPTIONAL]	ation releva	nt to your org	ganisation's mo	nitoring pro	cesses of e	external	
	,							

SAM 05	EXPLANATORY NOTES
	The indicator [SAM 5.2] is aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations.
	ESG score and weight does not have to be quantitative; this could also be assurance requirements or complying with minimum standards. ESG weight could for example capture the ESG performance minimum threshold or standards, and trigger points for action when monitoring your manager.
	You may wish to comment on variations in the reporting provided by your managers and on the reasons for these variations (e.g. does it reflect their contractual obligations? Is it a function of asset class or the types of investment being made?). ESG objectives linked to investment strategy - objectives set to adhere to Codes of Conduct, your organisation's investment strategy, investment policy and/or statement of beliefs and similar strategy / governance documents.
SAM 05	Investment restrictions and any controversial investment decisions – this could mean checking if investment manager has invested or disinvested with a non-consensus view.
	ESG portfolio characteristics – this would include reviewing what companies are in the portfolio, what are their respective ESG scores and how has the ESG composition of the portfolio changed from the last reporting period. This could also include reviewing examples of turnover for the monitored time period.
	Information on any ESG incidents – this could also include any examples of previously bought stock being sold due to ESG factors.
	Metrics on the real economy influence of the investments – this could for example be the energy efficiency of the portfolio of buildings.
	If you require your external managers to undertake carbon portfolio monitoring, you are strongly encouraged to report this using the 'additional information' field.



LOGIC							
SAM 05	[SAM 05] will be applicable if you report 'Monitoring' for the relevant external asset class in OO 11.2.						
ASSESSME	ENT						
SAM 05	Indicator scoring methodology						
	Selected response	Level score	Further Details				
	SAM 05.1						
	"None of the above" selected	0					
	One or two options selected	*	If both "PRI Transparency Reports" and				
	Three or four options selected	**	"PRI Assessment Reports" are selected, they are eligible to be counted as one				
	Five or more options selected	***	option together.				
	SAM 05.2						
	"None of the above" selected	0					
	One option selected	*					
	Two options selected	**					
	Three options selected	***					



SAM 06	INDICATOR								
SAM 06.1	When monitoring morganisation typical								
		All	Asset	Asset	Asset	Asset	Asset		
		assets	class 1	class 2	class 3	class 4	class 5		
	Engagement								
	Report on engagements undertaken (summary with metrics, themes, issues, sectors or similar)								
	Report on engagement ESG impacts (outcomes, progress made against objectives and examples)								
	Information on any escalation strategy taken after initial unsuccessful dialogue	٥	٥	٥			٥		
	Alignment with any eventual engagement programme done internally			٥	٥	٥			
	Information on the engagement activities' impact on investment decisions								
	Other RI considerations relating to engagement in investment management agreements; specify								
	None of the above	٥	٥				٥		



(Proxy) voting					
Report on voting undertaken (with outcomes and examples)		n/a	n/a	n/a	n/a
Report on rationale of voting decisions taken		n/a	n/a	n/a	n/a
Adherence with the agreed upon voting policy		n/a	n/a	n/a	n/a
Other RI considerations relating to (proxy) voting in investment management agreements; specify		n/a	n/a	n/a	n/a
None of the above		n/a	n/a	n/a	n/a

SAM 06	EXPLANATORY NOTES				
	This indicator aims to capture how your organ practices and processes to measure their influ		ır managers' active ownership		
	For listed equity this can mean reviewing the n situations the manager engages, requestinengagement outcomes feed back into the inve	g examples and or	utcomes, reviewing how the		
	Monitoring of engagement activities might entail discussing with your investment managers their escalation strategies in case of initial unsuccessful dialogue (i.e. filing a resolution, informing voting against management, issuing a public statement, considering reducing investment/divesting or litigation).				
	When reviewing proxy voting activities under might want to monitor that voting decisions hav voting policy and assess any situation where t	e been made in acco	ordance with your agreed upon		
	If your organisation undertakes some engage module), your monitoring process could includ and results of engagement practices with your	e ensuring alignmen	t of your manager's objectives		
LOGIC					
SAM 06	[SAM 06] is applicable if you report requiring ext	ernal managers to e	ngage or vote in [OO 10.1]		
	The engagement section of this indicator is applicable if in the Organisational Overview module, OO 10.1, it was reported for either Listed Equity or Fixed Income: 'We require our external managers to engage'.  • The Listed Equity column of table SAM 03.1 will apply if the above apples to Listed Equity  • The Fixed Income (SSA) column of table SAM 03.1 will apply if the above apples to Fixed Income (SSA)  (and so on for the other Fixed Income types)  The voting section of this indicator is applicable if in the Organisational Overview module, OC 10.1, it was reported that for Listed Equity - voting row: "We require our external managers to vote on our behalf".  "Report on voting undertaken (with outcomes and examples)" will trigger SAM 07.1				
SAM 06.1					
ASSESSMEN	I NT				
SAM 06	Maximum of six ★ per asset class				
	Indicator scoring methodology				
	Selected response	Level score	Further Details		
	Engagement				
	"None of the above" selected	0			
	One option selected	*			
	Two options selected	**			
	Three options selected	***			
	Proxy voting (not applicable for Fixed incor Fixed income – corporate (non-financial) ar				
	"None of the above" selected	0			



One option selected	*	
Two options selected	**	
Three options selected	***	

		Indicator status	Purpose	Principle
5	SAM 07	MANDATORY	ADDITIONAL ASSESSED	PRI 2

SAM 07	INDICATOR				
SAM 07.1	For the listed equities for which indicate the approximate percen				
	Votes cast (to the nearest 5%)  Specify the basis on v calculated.			which this percentage is	
			the total number have issued instr	of ballot items on which they ructions	
	% Of the total number of they could have voted			of company meetings at which	
	Of the total value which they could ha				your listed equity holdings on voted
	☐ We do not collect this information.				
SAM 07.2	Indicator status	Purpose			Principle
	VOLUNTARY	DESCF	RIPTIVE		PRI 2
	For the listed equities for which your behalf, indicate the approxiduring the reporting year.				
	Number of companies engaged				
	Proportion (to the nearest 5%)				%
SAM 07.3	Additional information [OPTIONAL]				



SAM 10	EXPLANATORY NOTES				
SAM 07	When calculating the percentage of votes cast or companies engaged with, please include only those holdings for which you have given external managers the mandate to vote or engage.				
	Variations in reporting	Variations in reporting			
	You may wish to comment on variations in the reporting provided by your investment managers and on the reasons for these variations.				
	Reasons why managers choose not to vote				
	You may wish to comment on a variety of reaso	ns why managers	s choose not to vote, including:		
	strategic decision not to vote on certain	types of assets	or funds;		
	<ul> <li>operational or timing constraints;</li> </ul>				
SAM 07.3	share-blocking;				
	conflicts of interest;				
	administrative impediments (e.g. power)	r of attorney requ	irements);		
	<ul><li>voting fees;</li></ul>				
	geographical restrictions (non-home m	arket);			
	insufficient information; and/or				
	overall cost effectiveness.				
LOGIC	,				
	[SAM 07] is applicable if you selected "Report of undertaken" in [SAM 06]	n voting undertak	ken" or "Report on engagements		
SAM 07	[SAM 07.1] is triggered if, in [SAM 06.1] you select and examples)"	cted "Report on v	oting undertaken (with outcomes		
	[SAM 07.2] is triggered if, in [SAM 06.1] you select with metrics, themes, issues, sectors or similar)'	ed 'Report on eng	gagements undertaken (summary		
ASSESSM	ENT				
SAM 07.1	Maximum score: Three ★ per asset class				
	Indicator scoring methodology				
	Selected response	Level score	Further Details		
	"We do not collect this information" selected or "<10%" reported				
	10 to 80% reported	*			
	80 to 95% reported	**			
	Above 95% reported	***			



#### SECTION

# Outputs and outcomes

SAM 08	Indicator status MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	Purpose DESCRIPTIVE	Principle PRI 1
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SAM 08	INDICATOR		
SAM 08.1	Describe how you ensure that best RI practice is applied to managing your assets		
		Measures	
	☐ Encourage improved RI practices with existing investment managers	[free text]	
	☐ Move assets over to investment managers with better RI practices	[free text]	
	☐ Other, specify	[free text]	
	☐ None of the above		
SAM 08.2	Additional information		
	[OPTIONAL]		



SAM 09	INDICATOR					
SAM 09.1	Provide examples of how ESG factors have been addressed in the manager selection, appointment and/or monitoring process for your organisation during the reporting year.					
	Topic or issue				Outcomes	
		<ul><li>Internal staff</li><li>Investment consultants</li><li>[drop down]</li></ul>	All     Applicable from SAM 03 [drop down]			
		[same as above]	[same as above]			
		[same as above]	[same as above]			
		[same as above]	[same as above]			
		[same as above]	[same as above]			
	☐ We are not	able to provide examples	3			
SAM 09.2	Additional info	rmation.				

SAM 09	EXPLANATORY NOTES			
SAM 09.1	Organisations are not expected to provide the names/details of investment managers. Ideally, you should provide examples from the current reporting year but you are encouraged to report examples from previous years if you want to provide a balanced view on how ESG factors influence selection, appointment and/or monitoring processes or to highlight specific features of your approach.			
LOGIC				
SAM 09.1	The asset classes in SAM 09.1 01.1 and OO 11.2	will be influenced by which asset	classes you reported in OO SAM	
ASSESSME	ENT			
SAM 09.1	Indicator scoring methodolog	ју		
	Selected response	Level score	Further Details	
	No example provided •			
	Example provided	***		



EXAMPLES				
Topic or issue	Conducted by	Asset class	Scope and process	Outcomes
Mining	Internal staff	Private Equity	In selecting a specialist PE mining investor, during due diligence, we noted that the GP's ESG process did not address health and safety. We asked the GP to develop a policy and criteria on this issue. The GP refused to do so.	We therefore decided not to invest in the fund.
Human rights	Internal staff	Property	The manager of the fund did not have a policy to address the rights of communities relocated for property development. We requested the manager to develop a policy on this issue.	The manager developed a policy and we were able to invest in the fund.

