

# **About this report**

PRI reporting is the largest global reporting project on responsible investment. It was developed with investors, for investors.

PRI signatories are required to report publicly on their responsible investment activities each year. In turn, they receive a number of outputs, including a public and private Transparency Report.

The public Transparency Reports, which are produced using signatories' reported information, provide accountability and support signatories to have internal discussions about their practices and to discuss these with their clients, beneficiaries, and other stakeholders.

This public Transparency Report is an export of the signatory's responses to the PRI Reporting Framework during the 2023 reporting period. It includes the signatory's responses to core indicators, as well as responses to plus indicators that the signatory has agreed to make public.

In response to signatory feedback, the PRI has not summarised signatories' responses – the information in this document is presented exactly as it was reported.

For each of the indicators in this document, all options selected by the signatory are presented, including links and qualitative responses. In some indicators, all applicable options are included for additional context.

# **Disclaimers**

### Responsible investment definitions

Within the PRI Reporting Framework Glossary, we provide definitions for key terms to guide reporting on responsible investment practices in the Reporting Framework. These definitions may differ from those used or proposed by other authorities and regulatory bodies due to evolving industry perspectives and changing legislative landscapes. Users of this report should be aware of these variations, as they may impact interpretations of the information provided.

# **Data accuracy**

This document presents information reported directly by signatories in the 2023 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented.

The PRI has taken reasonable action to ensure that data submitted by signatories in the reporting tool is reflected in their official PRI reports accurately. However, it is possible that small data inaccuracies and/or gaps remain, and the PRI shall not be responsible or liable for such inaccuracies and gaps.

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# SENIOR LEADERSHIP STATEMENT (SLS)

#### SENIOR LEADERSHIP STATEMENT

#### SENIOR LEADERSHIP STATEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1	CORE	N/A	N/A	PUBLIC	Senior Leadership Statement	GENERAL

#### Section 1. Our commitment

- Why does your organisation engage in responsible investment?
- What is your organisation's overall approach to responsible investment, and what major responsible investment commitment(s) have you made?

Socially responsible investing pays off. Based on our social responsibility, we want to contribute to sustainability in the broad sense and specifically to climate improvement and balanced social relations (especially increasing employment opportunities for people with disabilities). In our view, socially responsible leads to a more robust portfolio with a better risk/return ratio. In our socially responsible investment policy, some themes receive extra attention. Because we consider them extra important. These themes are: 1) more employment opportunities for people who are vulnerable in the labor market, 2) climate improvement, and 3) social housing.

Our investment approach aims to have real world impact.

We are aware of limitations of any individual instrument; therefore, we deploy the full pallet of viable instruments. That is, active ownership, impact investing, screening, and exclusions. Exclusion being the option of last resort. We are proud of our innovative inclusion portfolio. PWRI is the pension fund for people with a vulnerable position in the labor market. We believe that everyone has a right to work. That is why we encourage listed companies to employ people who are vulnerable on the labor market. We invest a small part of our assets in companies that employ or want to employ these people. We call this our 'inclusion policy'.

Being vocal on socially responsible investing is important to lead by example and for SRI to gain momentum. Therefore, we have pledged to avoid financing greenhouse gas emissions with our investments in accordance with the Dutch Climate Commitment and the Paris Agreement. We have also pledged to avoid financing the tobacco industry.

In 2020, we signed the Investor Statement on Disability Inclusion. This is an investor statement for inclusiveness of people with vulnerable labor market positions. This is an international initiative. The goal is to encourage companies to employ more people with vulnerable labor market positions.

#### Section 2. Annual overview



- Discuss your organisation's progress during the reporting year on the responsible investment issue you consider most relevant or material to your organisation or its assets.
- Reflect on your performance with respect to your organisation's responsible investment objectives and targets during the reporting year. Details might include, for example, outlining your single most important achievement or describing your general progress on topics such as the following (where applicable):
- refinement of ESG analysis and incorporation
- stewardship activities with investees and/or with policymakers
- collaborative engagements
- attainment of responsible investment certifications and/or awards

We emphasize three themes with our socially responsible investment policy. These themes are climate improvement, more employment opportunities for people who are vulnerable in the labor market and building and making sustainable of rental housing in social housing.

With the Climate Agreement, the government wants to reduce greenhouse gas emissions significantly. CO2 is a well-known example of a greenhouse gas. The goal is that the earth warms up less quickly.

And no more than 1.5 degrees warmer. We want that too. That is why we signed the Climate Accord. We have three goals: 1) by 2050, we no longer finance greenhouse gas emissions with our investments, 2) by 2030, the greenhouse gas emissions we finance with our investments are half what they were in 2020, and 3) we will increasingly invest in climate solutions. To achieve these goals, we have created an action plan, which we are currently implementing.

Investing in companies is a great way to engage in conversation.

With the companies in our "inclusion portfolio," we engage in discussions about jobs for people with vulnerable positions in the labor market. These companies would like to employ these people. Most of the companies in our inclusion portfolio participate in the Social Business Performance Ladder (PSO). The PSO is a national standard for social entrepreneurship. We have 50 companies in our inclusion portfolio: 31 have a PSO label, the rest are in the process of or planning to obtain the quality mark.

In 2021, the board decided to invest in WSW loans.

These are loans to housing associations, intended for social housing construction. And for sustainability of social housing. WSW stands for Waarborgfonds Sociale Woningbouw. The board made this choice because many of our participants live in social housing. At the end of 2022, we were ready to invest. In early 2023, we invested in the first WSW loans.

In 2022, our asset manager spoke to 385 companies in 38 countries.

Those conversations covered topics such as climate change, sustainable food systems, biodiversity and fair wages. This had 142 results. An example of such a result is mining company BHP's decision to better protect biodiversity. Our asset manager also voted at 1,443 shareholder meetings. 19% of these votes were against the advice of the companies' boards. They were mainly votes against the composition of the board and against the remuneration of directors. Further, through the voting policy in 2022, our asset manager urged companies to contribute to reducing CO2 emissions.

In 2022, there were three companies where our discussions and voting policy had no effect. If this does not changes, we will stop investing in these companies. At the end of 2022, we researched companies in which we do not want to invest in anyway. We excluded 174 companies. For example, because they have close ties to the Russian government. Furthermore, we mainly excluded companies that cooperate in the production and sale of tobacco or tobacco products. All investments in tobacco or tobacco products have now been sold.

#### Section 3. Next steps

■ What specific steps has your organisation outlined to advance your commitment to responsible investment in the next two years?

We intend to continue the progress we have made in the last two to three years. We work closely together with our fiduciary manager who enables us to be an active owner. Working closely together we can continue our thematic approach without interfering with our intention of being an active owner. We intend to keep making progress with our action plan for the Climate Commitment and pushing forward with the inclusion policy.



#### Section 4. Endorsement

'The Senior Leadership Statement has been prepared and/or reviewed by the undersigned and reflects our organisation-wide commitment and approach to responsible investment'.

Name

Jeroen van der Geest

Position

Chairman of the Board

Organisation's Name

Stichting Pensioenfonds Werk en (re)Integratie



'This endorsement applies only to the Senior Leadership Statement and should not be considered an endorsement of the information reported by the above-mentioned organisation in the various modules of the Reporting Framework. The Senior Leadership Statement serves as a general overview of the above-mentioned organisation's responsible investment approach. The Senior Leadership Statement does not constitute advice and should not be relied upon as such. Further, it is not a substitute for the skill, judgement and experience of any third parties, their management, employees, advisors and/or clients when making investment and other business decisions'.

# **ORGANISATIONAL OVERVIEW (00)**

#### ORGANISATIONAL INFORMATION

#### REPORTING YEAR

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 1	CORE	N/A	N/A	PUBLIC	Reporting year	GENERAL

What is the year-end date of the 12-month period you have chosen to report for PRI reporting purposes?

	Date	Month	Year
Year-end date of the 12-month period for PRI reporting purposes:	31	12	2022



#### **SUBSIDIARY INFORMATION**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 2	CORE	N/A	00 2.1	PUBLIC	Subsidiary information	GENERAL

#### Does your organisation have subsidiaries?

o (A) Yes

**⊚** (B) No

### **ASSETS UNDER MANAGEMENT**

## **ALL ASSET CLASSES**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 4	CORE	00 3	N/A	PUBLIC	All asset classes	GENERAL

#### What are your total assets under management (AUM) at the end of the reporting year, as indicated in [OO 1]?

	USD
(A) AUM of your organisation, including subsidiaries, and excluding the AUM subject to execution, advisory, custody, or research advisory only	US\$ 10,052,000,000.00
(B) AUM of subsidiaries that are PRI signatories in their own right and excluded from this submission, as indicated in [OO 2.2]	US\$ 0.00
(C) AUM subject to execution, advisory, custody, or research advisory only	US\$ 0.00



## **ASSET BREAKDOWN**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 5	CORE	OO 3	Multiple indicators	PUBLIC	Asset breakdown	GENERAL

Provide a percentage breakdown of your total AUM at the end of the reporting year as indicated in [OO 1].

	(1) Percentage of Internally managed AUM	(2) Percentage of Externally managed AUM
(A) Listed equity	0%	>10-50%
(B) Fixed income	0%	>50-75%
(C) Private equity	0%	>0-10%
(D) Real estate	0%	>0-10%
(E) Infrastructure	0%	0%
(F) Hedge funds	0%	0%
(G) Forestry	0%	0%
(H) Farmland	0%	0%
(I) Other	0%	0%
(J) Off-balance sheet	0%	0%



## **ASSET BREAKDOWN: EXTERNALLY MANAGED ASSETS**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.1	CORE	OO 5	Multiple	PUBLIC	Asset breakdown: Externally managed assets	GENERAL

Provide a further breakdown of your organisation's externally managed listed equity and/or fixed income AUM.

	(1) Listed equity	(2) Fixed income - SSA	(3) Fixed income - corporate	(4) Fixed income - securitised	(5) Fixed income - private debt
(A) Active	0%	>10-50%	>10-50%	0%	0%
(B) Passive	>75%	>10-50%	0%		

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.2	CORE	OO 5, OO 5.1	SAM 3, SAM 8	PUBLIC	Asset breakdown: Externally managed assets	GENERAL

Provide a breakdown of your organisation's externally managed AUM between segregated mandates and pooled funds or investments.

	(1) Segregated mandate(s)	(2) Pooled fund(s) or pooled investment(s)
(B) Listed equity - passive	>75%	>0-10%
(C) Fixed income - active	0%	>75%
(D) Fixed income - passive	>50-75%	>10-50%
(E) Private equity	0%	>75%
(F) Real estate	0%	>75%



#### **MANAGEMENT BY PRI SIGNATORIES**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 6	CORE	OO 5	N/A	PUBLIC	Management by PRI signatories	GENERAL

What percentage of your organisation's externally managed assets are managed by PRI signatories?

>75%

#### **GEOGRAPHICAL BREAKDOWN**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 7	CORE	Multiple, see guidance	N/A	PUBLIC	Geographical breakdown	GENERAL

How much of your AUM in each asset class is invested in emerging markets and developing economies?

#### **AUM in Emerging Markets and Developing Economies**

(A) Listed equity	(4) >20 to 30%
(B) Fixed income – SSA	(3) >10 to 20%
(C) Fixed income – corporate	(1) 0%
(F) Private equity	(1) 0%
(G) Real estate	(1) 0%



### **STEWARDSHIP**

#### **STEWARDSHIP**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 8	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship	GENERAL

Does your organisation conduct stewardship activities, excluding (proxy) voting, for any of your assets?

	(2) Listed equity - passive	(3) Fixed income - active	(4) Fixed income - passive	(5) Private equity	(6) Real estate
(A) Yes, through internal staff					
(B) Yes, through service providers	<b>☑</b>	V	<b></b> ✓		
(C) Yes, through external managers				V	$\square$
(D) We do not conduct stewardship	0	0	0	0	0

# STEWARDSHIP: (PROXY) VOTING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship: (Proxy) voting	GENERAL

Does your organisation conduct (proxy) voting activities for any of your listed equity holdings?



#### (2) Listed equity - passive

(A) Yes, through internal staff	
(B) Yes, through service providers	
(C) Yes, through external managers	
(D) We do not conduct (proxy) voting	0

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9.1	CORE	00 9	PGS 10.1, PGS 31	PUBLIC	Stewardship: (Proxy) voting	GENERAL

For each asset class, on what percentage of your listed equity holdings do you have the discretion to vote?

Percentage of your listed equity holdings over which you have the discretion to vote

(B) Listed equity - passive (11) >90 to <100%

### **ESG INCORPORATION**

#### **EXTERNAL MANAGER SELECTION**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 12	CORE	OO 5, OO 5.1	Multiple indicators	PUBLIC	External manager selection	1

For each externally managed asset class, does your organisation incorporate ESG factors when selecting external investment managers?



# (1) Yes, we incorporate ESG factors when selecting external investment managers

# (2) No, we do not incorporate ESG factors when selecting external investment managers

(B) Listed equity - passive	•	0
(C) Fixed income - active	•	ο
(D) Fixed income - passive	•	0
(E) Private equity	•	0
(F) Real estate	•	0

### **EXTERNAL MANAGER APPOINTMENT**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 13	CORE	OO 5, OO 5.1	Multiple indicators	PUBLIC	External manager appointment	1

For each externally managed asset class, does your organisation incorporate ESG factors when appointing external investment managers?

	(1) Yes, we incorporate ESG factors when appointing external investment managers	(2) No, we do not incorporate ESG factors when appointing external investment managers
(B) Listed equity - passive	•	0
(C) Fixed income - active	•	0
(D) Fixed income - passive	•	0
(E) Private equity	•	0
(F) Real estate	•	0



#### **EXTERNAL MANAGER MONITORING**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 14	CORE	OO 5, OO 5.1	Multiple indicators	PUBLIC	External manager monitoring	1

For each externally managed asset class, does your organisation incorporate ESG factors when monitoring external investment managers?

	(1) Yes, we incorporate ESG factors when monitoring external investment managers	(2) No, we do not incorporate ESG factors when monitoring external investment managers
(B) Listed equity - passive	•	0
(C) Fixed income - active	•	0
(D) Fixed income - passive	•	0
(E) Private equity	•	0
(F) Real estate	•	0

# **ESG/SUSTAINABILITY FUNDS AND PRODUCTS**

#### LABELLING AND MARKETING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18	CORE	OO 11–14	OO 18.1	PUBLIC	Labelling and marketing	1

#### Do you explicitly market any of your products and/or funds as ESG and/or sustainable?

- $\circ~$  (A) Yes, we market products and/or funds as ESG and/or sustainable
- o (B) No, we do not offer products or funds explicitly marketed as ESG and/or sustainable
- (C) Not applicable; we do not offer products or funds



# **SUMMARY OF REPORTING REQUIREMENTS**

# **SUMMARY OF REPORTING REQUIREMENTS**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 21	CORE	Multiple indicators	Multiple indicators	PUBLIC	Summary of reporting requirements	GENERAL

The following table shows which modules are mandatory or voluntary to report on in the separate PRI asset class modules. Where a module is voluntary, indicate if you wish to report on it.

Applicable modules	(1) Mandatory to report (pre-filled based on previous responses)	(2.1) Voluntary to report. Yes, I want to opt-in to reporting on the module	(2.2) Voluntary to report. No, I want to opt-out of reporting on the module
Policy, Governance and Strategy	•	0	0
Confidence Building Measures	•	0	0
(U) External manager selection, appointment and monitoring (SAM) – listed equity - passive	•	0	0
(V) External manager selection, appointment and monitoring (SAM) – fixed income - active	•	0	0
(W) External manager selection, appointment and monitoring (SAM) – fixed income - passive	•	0	0
(X) External manager selection, appointment and monitoring (SAM) – private equity	O	O	•



0

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#### **SUBMISSION INFORMATION**

#### REPORT DISCLOSURE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 32	CORE	OO 3, OO 31	N/A	PUBLIC	Report disclosure	GENERAL

How would you like to disclose the detailed percentage figures you reported throughout the Reporting Framework?

- o (A) Publish as absolute numbers
- (B) Publish as ranges

# POLICY, GOVERNANCE AND STRATEGY (PGS)

#### **POLICY**

#### RESPONSIBLE INVESTMENT POLICY ELEMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 1	CORE	OO 8, OO 9	Multiple indicators	PUBLIC	Responsible investment policy elements	1, 2

#### Which elements are covered in your formal responsible investment policy(ies)?

- ☑ (A) Overall approach to responsible investment
- ☑ (B) Guidelines on environmental factors
- ☑ (C) Guidelines on social factors
- ☑ (D) Guidelines on governance factors
- ☑ (E) Guidelines on sustainability outcomes
- ☑ (F) Guidelines tailored to the specific asset class(es) we hold
- **☑** (G) Guidelines on exclusions
- ☐ (H) Guidelines on managing conflicts of interest related to responsible investment
- ☑ (I) Stewardship: Guidelines on engagement with investees
- ☐ (J) Stewardship: Guidelines on overall political engagement
- ☐ (K) Stewardship: Guidelines on engagement with other key stakeholders
- ☑ (L) Stewardship: Guidelines on (proxy) voting
- ☑ (M) Other responsible investment elements not listed here



Specify:

Guidelines on monitoring and accountability

o (N) Our organisation does not have a formal responsible investment policy and/or our policy(ies) do not cover any responsible investment elements

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 2	CORE	PGS 1	Multiple, see guidance	PUBLIC	Responsible investment policy elements	1

#### Does your formal responsible investment policy(ies) include specific guidelines on systematic sustainability issues?

- ☑ (A) Specific guidelines on climate change (may be part of guidelines on environmental factors)
- ☑ (B) Specific guidelines on human rights (may be part of guidelines on social factors)
- ☑ (C) Specific guidelines on other systematic sustainability issues Specify:

Guidelines on governance

o (D) Our formal responsible investment policy(ies) does not include guidelines on systematic sustainability issues

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 3	CORE	PGS 1, PGS 2	N/A	PUBLIC	Responsible investment policy elements	6

#### Which elements of your formal responsible investment policy(ies) are publicly available?

(A) Overall approach to responsible investment Add link:

https://www.pwri.nl/over-pwri-nw/verantwoord-beleggen-loont/downloads-verantwoord-beleggen#toon-alles

☑ (B) Guidelines on environmental factors

Add link:

https://www.pwri.nl/over-pwri-nw/verantwoord-beleggen-loont/downloads-verantwoord-beleggen#toon-alles

☑ (C) Guidelines on social factors

Add link:

https://www.pwri.nl/over-pwri-nw/verantwoord-beleggen-loont/downloads-verantwoord-beleggen#toon-alles

☑ (D) Guidelines on governance factors

Add link:

https://www.pwri.nl/over-pwri-nw/verantwoord-beleggen-loont/downloads-verantwoord-beleggen#toon-alles

 $\ensuremath{\square}$  (E) Guidelines on sustainability outcomes



Add link:

https://www.pwri.nl/over-pwri-nw/verantwoord-beleggen-loont/downloads-verantwoord-beleggen#toon-alles

☑ (F) Specific guidelines on climate change (may be part of guidelines on environmental factors)

Add link:

https://www.pwri.nl/over-pwri-nw/verantwoord-beleggen-loont/downloads-verantwoord-beleggen#toon-alles

(G) Specific guidelines on human rights (may be part of guidelines on social factors) Add link:

https://www.pwri.nl/over-pwri-nw/verantwoord-beleggen-loont/downloads-verantwoord-beleggen#toon-alles

(H) Specific guidelines on other systematic sustainability issues Add link:

https://www.pwri.nl/over-pwri-nw/verantwoord-beleggen-loont/downloads-verantwoord-beleggen#toon-alles

(I) Guidelines tailored to the specific asset class(es) we hold Add link:

https://www.pwri.nl/over-pwri-nw/verantwoord-beleggen-loont/downloads-verantwoord-beleggen#toon-alles

☑ (J) Guidelines on exclusions

Add link:

https://www.pwri.nl/over-pwri-nw/verantwoord-beleggen-loont/downloads-verantwoord-beleggen#toon-alles

(L) Stewardship: Guidelines on engagement with investees Add link:

https://www.pwri.nl/over-pwri-nw/verantwoord-beleggen-loont/downloads-verantwoord-beleggen#toon-alles

(O) Stewardship: Guidelines on (proxy) voting Add link:

https://www.pwri.nl/over-pwri-nw/verantwoord-beleggen-loont/downloads-verantwoord-beleggen#toon-alles

☑ (P) Other responsible investment aspects not listed here

Add link:

https://www.pwri.nl/over-pwri-nw/verantwoord-beleggen-loont/downloads-verantwoord-beleggen#toon-alles

o (Q) No elements of our formal responsible investment policy(ies) are publicly available

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 4	PLUS	PGS 1	N/A	PUBLIC	Responsible investment policy elements	1-6

Does your formal responsible investment policy(ies) identify a link between your responsible investment activities and your fiduciary duties or equivalent obligations?

Elaborate:



Based on our social responsibility, we want to contribute to sustainability sustainability in the broad sense and specifically to climate improvement and balanced social relations (especially increasing employment opportunities for people with disabilities). In our view, this leads to a more robust portfolio with a better risk/return ratio.

o (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 5	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

#### Which elements are covered in your organisation's policy(ies) or guidelines on stewardship?

√	(A)	<b>Overal</b>	l stewardshi	p objectives
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- ☑ (B) Prioritisation of specific ESG factors to be advanced via stewardship activities
- ☑ (C) Criteria used by our organisation to prioritise the investees, policy makers, key stakeholders, or other entities on which to focus our stewardship efforts
- □ (D) How different stewardship tools and activities are used across the organisation
- $\square$  (E) Approach to escalation in stewardship
- $\Box$  (F) Approach to collaboration in stewardship
- $\square$  (G) Conflicts of interest related to stewardship
- ☑ (H) How stewardship efforts and results are communicated across the organisation to feed into investment decision-making and vice versa
- ☐ (I) Other
- o (J) None of the above elements is captured in our policy(ies) or guidelines on stewardship

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 6	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

#### Does your policy on (proxy) voting include voting principles and/or guidelines on specific ESG factors?

- ☑ (A) Yes, it includes voting principles and/or guidelines on specific environmental factors
- ☑ (B) Yes, it includes voting principles and/or guidelines on specific social factors
- ☑ (C) Yes, it includes voting principles and/or guidelines on specific governance factors
- o (D) Our policy on (proxy) voting does not include voting principles or guidelines on specific ESG factors

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 7	CORE	OO 9	N/A	PUBLIC	Responsible investment policy elements	2



#### Does your organisation have a policy that states how (proxy) voting is addressed in your securities lending programme?

- o (A) We have a publicly available policy to address (proxy) voting in our securities lending programme
- o (B) We have a policy to address (proxy) voting in our securities lending programme, but it is not publicly available
- o (C) We rely on the policy of our external service provider(s)
- o (D) We do not have a policy to address (proxy) voting in our securities lending programme
- (E) Not applicable; we do not have a securities lending programme

#### RESPONSIBLE INVESTMENT POLICY COVERAGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 8	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy coverage	1

What percentage of your total AUM is covered by the below elements of your responsible investment policy(ies)?

#### Combined AUM coverage of all policy elements

(A) Overall approach to responsible investment

(B) Guidelines on environmental factors

(C) Guidelines on social factors

(D) Guidelines on governance factors

(7) 100%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 9	CORE	PGS 2	N/A	PUBLIC	Responsible investment policy coverage	1

What proportion of your AUM is covered by your formal policies or guidelines on climate change, human rights, or other systematic sustainability issues?



#### **AUM** coverage

(A) Specific guidelines on climate change	(2) for a majority of our AUM
(B) Specific guidelines on human rights	(2) for a majority of our AUM
(C) Specific guidelines on other systematic sustainability issues	(2) for a majority of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10	CORE	OO 8, OO 9, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

Per asset class, what percentage of your AUM is covered by your policy(ies) or guidelines on stewardship with investees?

#### ☑ (A) Listed equity

- (1) Percentage of AUM covered
  - o (1) >0% to 10%
  - o (2) >10% to 20%
  - o (3) >20% to 30%
  - o (4) >30% to 40%
  - o (5) >40% to 50%
  - o (6) >50% to 60%
  - o (7) >60% to 70%
  - o (8) >70% to 80%
  - o (9) >80% to 90%
  - o (10) >90% to <100%
  - **(11) 100%**

#### ☑ (B) Fixed income

- (1) Percentage of AUM covered
  - o (1) >0% to 10%
  - o (2) >10% to 20%
  - o (3) >20% to 30%
  - o (4) >30% to 40%
  - o (5) >40% to 50%
  - o (6) >50% to 60%
  - o (7) >60% to 70%
  - o (8) >70% to 80%
  - o (9) >80% to 90%
  - o (10) >90% to <100%
  - **(11) 100%**
- $\hfill\Box$  (C) Private equity
- ☐ (D) Real estate



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10.1	CORE	OO 9.1, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

#### What percentage of your listed equity holdings is covered by your guidelines on (proxy) voting?

#### ☑ (B) Passively managed listed equity

- (1) Percentage of your listed equity holdings over which you have the discretion to vote
  - o (1) >0% to 10%
  - o (2) >10% to 20%
  - o (3) >20% to 30%
  - o (4) >30% to 40%
  - o (5) >40% to 50%
  - o (6) >50% to 60%
  - (7) >60% to 70%
  - o (8) >70% to 80%
  - o (9) >80% to 90%
  - o (10) >90% to <100%
  - **(11) 100%**

#### **GOVERNANCE**

#### **ROLES AND RESPONSIBILITIES**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11	CORE	N/A	Multiple indicators	PUBLIC	Roles and responsibilities	1

Which senior level body(ies) or role(s) in your organisation have formal oversight over and accountability for responsible investment?

- ☑ (A) Board members, trustees, or equivalent
- $\square$  (B) Senior executive-level staff, or equivalent
- $\square$  (C) Investment committee, or equivalent
- ☐ (D) Head of department, or equivalent
- o (E) None of the above bodies and roles have oversight over and accountability for responsible investment



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.1	CORE	PGS 1, PGS 2, PGS 11	N/A	PUBLIC	Roles and responsibilities	1, 2

Does your organisation's senior level body(ies) or role(s) have formal oversight over and accountability for the elements covered in your responsible investment policy(ies)?

#### (1) Board members, trustees, or equivalent

(A) Overall approach to responsible investment	
(B) Guidelines on environmental, social and/or governance factors	
(C) Guidelines on sustainability outcomes	
(D) Specific guidelines on climate change (may be part of guidelines on environmental factors)	
(E) Specific guidelines on human rights (may be part of guidelines on social factors)	
(F) Specific guidelines on other systematic sustainability issues	
(G) Guidelines tailored to the specific asset class(es) we hold	
(H) Guidelines on exclusions	Ø
(J) Stewardship: Guidelines on engagement with investees	



(M) Stewardship: Guidelines on (proxy) voting

(N) This role has no formal oversight over and accountability for any of the above elements covered in our responsible investment policy(ies)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.2	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1-6

0

Does your organisation have governance processes or structures to ensure that your overall political engagement is aligned with your commitment to the principles of PRI, including any political engagement conducted by third parties on your behalf?

- o (A) Yes
- o (B) No
- **●** (C) Not applicable, our organisation does not conduct any form of political engagement directly or through any third parties

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 12	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1

In your organisation, which internal or external roles are responsible for implementing your approach to responsible investment?

- $\square$  (A) Internal role(s)
- ☑ (B) External investment managers, service providers, or other external partners or suppliers Specify:

Through the reo® service provided by Columbia Threadneedle Investments, we leverage the expertise of dedicated engagement and voting analysts, who are specialists on a diverse range of ESG issues, sectors and geographies, and are involved in multiple industry collaboration projects and public policy work.

o (C) We do not have any internal or external roles with responsibility for implementing responsible investment



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 13	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

Does your organisation use responsible investment KPIs to evaluate the performance of your board members, trustees, or equivalent?

- o (A) Yes, we use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent
- (B) No, we do not use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent

Explain why: (Voluntary)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 15	PLUS	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

What responsible investment competencies do you regularly include in the training of senior-level body(ies) or role(s) in your organisation?

# (1) Board members, trustees or equivalent

(A) Specific competence in climate change mitigation and adaptation	
(B) Specific competence in investors' responsibility to respect human rights	
(C) Specific competence in other systematic sustainability issues	
(D) The regular training of this senior leadership role does not include any of the above responsible investment competencies	0



#### **EXTERNAL REPORTING AND DISCLOSURES**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 16	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

#### What elements are included in your regular reporting to clients and/or beneficiaries for the majority of your AUM?

- ☑ (A) Any changes in policies related to responsible investment
- ☑ (B) Any changes in governance or oversight related to responsible investment
- **☑** (C) Stewardship-related commitments
- **☑** (D) Progress towards stewardship-related commitments
- ☑ (E) Climate-related commitments
- ☑ (F) Progress towards climate-related commitments
- **☑** (G) Human rights-related commitments
- ☑ (H) Progress towards human rights-related commitments
- (I) Commitments to other systematic sustainability issues
- ☑ (J) Progress towards commitments on other systematic sustainability issues
- o (K) We do not include any of these elements in our regular reporting to clients and/or beneficiaries for the majority of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 17	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose climate-related information in line with the Task Force on Climate-Related Financial Disclosures' (TCFD) recommendations?

- $\square$  (A) Yes, including all governance-related recommended disclosures
- $\square$  (B) Yes, including all strategy-related recommended disclosures
- ☐ (C) Yes, including all risk management–related recommended disclosures
- $\square$  (D) Yes, including all applicable metrics and targets-related recommended disclosures

Explain why: (Voluntary)

TCFD does not apply to the pension fund.



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 18	PLUS	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, to which international responsible investment standards, frameworks, or regulations did your organisation report?

☑ (A) Disclosures against the European Union's Sustainable Finance Disclosure Regulation (SFDR) Link to example of public disclosures

https://www.pwri.nl/over-pwri-nw/verantwoord-beleggen-loont/downloads-verantwoord-beleggen?cms%5Bcm923%5D%5Bdownload%5D=307

□ (	B)	Disclosures	against the	European	Union's	Taxonomy	/
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- ☐ (C) Disclosures against the CFA's ESG Disclosures Standard
- $\hfill\square$  (D) Disclosures against other international standards, frameworks or regulations
- ☑ (E) Disclosures against other international standards, frameworks or regulations Specify:

Benchmark on Responsible Investment by Pension Funds in the Netherlands 2022

Link to example of public disclosures

https://www.vbdo.nl/en/2022/11/dutch-pension-funds-increasingly-focus-on-biodiversity/

- ☐ (F) Disclosures against other international standards, frameworks or regulations
- $\square$  (G) Disclosures against other international standards, frameworks or regulations

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 19	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose its membership in and support for trade associations, think tanks or similar bodies that conduct any form of political engagement?

 $\odot$  (A) Yes, we publicly disclosed our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement

Add link(s):

https://www.pwri.nl/over-pwri/wat-en-wie-is-pwri/organisatie

- o (B) No, we did not publicly disclose our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
- o (C) Not applicable, we were not members in or supporters of any trade associations, think tanks, or similar bodies that conduct any form of political engagement during the reporting year



#### **STRATEGY**

#### **CAPITAL ALLOCATION**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 20	CORE	N/A	N/A	PUBLIC	Capital allocation	1

#### Which elements do your organisation-level exclusions cover?

- ☑ (A) Exclusions based on our organisation's values or beliefs regarding particular sectors, products or services
- ☑ (B) Exclusions based on our organisation's values or beliefs regarding particular regions or countries
- ☑ (C) Exclusions based on minimum standards of business practice aligned with international norms such as the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, UN Security Council sanctions or the UN Global Compact
- ☑ (D) Exclusions based on our organisation's climate change commitments
- ☐ (E) Other elements
- o (F) Not applicable; our organisation does not have any organisation-level exclusions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 21	CORE	N/A	N/A	PUBLIC	Capital allocation	1

#### How does your responsible investment approach influence your strategic asset allocation process?

- ☑ (A) We incorporate ESG factors into our assessment of expected asset class risks and returns Select from dropdown list:
  - o (1) for all of our AUM subject to strategic asset allocation
  - (2) for a majority of our AUM subject to strategic asset allocation
  - o (3) for a minority of our AUM subject to strategic asset allocation
- $\square$  (B) We incorporate climate change–related risks and opportunities into our assessment of expected asset class risks and returns
- ☐ (C) We incorporate human rights—related risks and opportunities into our assessment of expected asset class risks and returns
- □ (D) We incorporate risks and opportunities related to other systematic sustainability issues into our assessment of expected asset class risks and returns
- (E) We do not incorporate ESG factors, climate change, human rights or other systematic sustainability issues into our assessment of expected asset class risks and returns
- o (F) Not applicable; we do not have a strategic asset allocation process



#### STEWARDSHIP: OVERALL STEWARDSHIP STRATEGY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 22	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

For the majority of AUM within each asset class, which of the following best describes your primary stewardship objective?

	(1) Listed equity	(2) Fixed income	(3) Private equity	(4) Real estate
(A) Maximise our portfolio-level risk-adjusted returns. In doing so, we seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.	•	•	ο	Ο
(B) Maximise our individual investments' risk-adjusted returns. In doing so, we do not seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.	o	O	•	•

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Which of the following best describes your organisation's default position, or the position of the external service providers or external managers acting on your behalf, concerning collaborative stewardship efforts?

- $\circ$  (A) We recognise the value of collective action, and as a result, we prioritise collaborative stewardship efforts wherever possible
- (B) We collaborate on a case-by-case basis
- o (C) Other
- o (D) We do not join collaborative stewardship efforts



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24.1	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Elaborate on your organisation's default position on collaborative stewardship, or the position of the external service providers or external investment managers acting on your behalf, including any other details on your overall approach to collaboration.

While our engagement service provider, Columbia Threadneedle Investments, generally prefers to engage issuers in private to enable honest, open, and frank discussions to take place, collaboration with other investors or stakeholders might be an impactful engagement or escalation strategy. Given ownership of an issuer is often dispersed, for a stakeholder's voice to have weight it may require collaborative engagement to address issues effectively at the issuer or industry level. Columbia Threadneedle Investments supports dialogue amongst investors and collaborative engagement on a case by case basis where this contributes to the creation and protection of stakeholder value.

### STEWARDSHIP: (PROXY) VOTING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 29	CORE	OO 9, PGS 1	N/A	PUBLIC	Stewardship: (Proxy) voting	2

When you use external service providers to give recommendations, how do you ensure those recommendations are consistent with your organisation's (proxy) voting policy?

- $\Box$  (A) Before voting is executed, we review external service providers' voting recommendations for controversial and high-profile votes
- $\Box$  (B) Before voting is executed, we review external service providers' voting recommendations where the application of our voting policy is unclear
- $\Box$  (C) We ensure consistency with our voting policy by reviewing external service providers' voting recommendations only after voting has been executed
- o (D) We do not review external service providers' voting recommendations
- (E) Not applicable; we do not use external service providers to give voting recommendations

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 30	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2



#### How is voting addressed in your securities lending programme?

- o (A) We recall all securities for voting on all ballot items
- (B) When a vote is deemed important according to pre-established criteria (e.g. high stake in the company), we recall all our securities for voting
- o (C) Other
- o (D) We do not recall our securities for voting purposes
- (E) Not applicable; we do not have a securities lending programme

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 31	CORE	OO 9.1	N/A	PUBLIC	Stewardship: (Proxy) voting	2

For the majority of votes cast over which you have discretion to vote, which of the following best describes your decision making approach regarding shareholder resolutions (or that of your external service provider(s) if decision making is delegated to them)?

- (A) We vote in favour of resolutions expected to advance progress on our stewardship priorities, including affirming a company's good practice or prior commitment
- o (B) We vote in favour of resolutions expected to advance progress on our stewardship priorities, but only if the investee company has not already publicly committed to the action(s) requested in the proposal
- o (C) We vote in favour of shareholder resolutions only as an escalation measure
- o (D) We vote in favour of the investee company management's recommendations by default
- o (E) Not applicable; we do not vote on shareholder resolutions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 32	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

During the reporting year, how did your organisation, or your external service provider(s), pre-declare voting intentions prior to voting in annual general meetings (AGMs) or extraordinary general meetings (EGMs)?

- ☐ (A) We pre-declared our voting intentions publicly through the PRI's vote declaration system on the Resolution Database
- $\square$  (B) We pre-declared our voting intentions publicly by other means, e.g. through our website
- ☑ (C) We privately communicated our voting decision to investee companies prior to the AGM/EGM
- $\circ~$  (D) We did not privately or publicly communicate our voting intentions prior to the AGM/EGM
- o (E) Not applicable; we did not cast any (proxy) votes during the reporting year



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 33	CORE	OO 9	PGS 33.1	PUBLIC	Stewardship: (Proxy) voting	2

After voting has taken place, do you publicly disclose your (proxy) voting decisions or those made on your behalf by your external service provider(s), company by company and in a central source?

(A) Yes, for all (proxy) votes Add link(s):

https://www.pwri.nl/over-pwri-nw/verantwoord-beleggen-loont/downloads-verantwoord-beleggen#sfdr https://vds.issgovernance.com/vds/#/Mjc3NQ==/

- o (B) Yes, for the majority of (proxy) votes
- o (C) Yes, for a minority of (proxy) votes
- o (D) No, we do not publicly report our (proxy) voting decisions company-by-company and in a central source

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 33.1	CORE	PGS 33	N/A	PUBLIC	Stewardship: (Proxy) voting	2

In the majority of cases, how soon after an investee's annual general meeting (AGM) or extraordinary general meeting (EGM) do you publish your voting decisions?

- o (A) Within one month of the AGM/EGM
- o (B) Within three months of the AGM/EGM
- o (C) Within six months of the AGM/EGM
- (D) Within one year of the AGM/EGM
- o (E) More than one year after the AGM/EGM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 34	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2



After voting has taken place, did your organisation, and/or the external service provider(s) acting on your behalf, communicate the rationale for your voting decisions during the reporting year?

# (1) In cases where we abstained or voted against management recommendations

# (2) In cases where we voted against an ESG-related shareholder resolution

(A) Yes, we publicly disclosed the rationale	(1) for all votes	(1) for all votes
(B) Yes, we privately communicated the rationale to the company		
(C) We did not publicly or privately communicate the rationale, or we did not track this information	0	o
(D) Not applicable; we did not abstain or vote against management recommendations or ESG-related shareholder resolutions during the reporting year	0	0

#### (A) Yes, we publicly disclosed the rationale - Add link(s):

https://www.pwri.nl/over-pwri-nw/verantwoord-beleggen-loont/downloads-verantwoord-beleggen#sfdr https://vds.issgovernance.com/vds/#/Mjc3NQ==/

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 35	PLUS	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

How does your organisation ensure vote confirmation, i.e. that your votes have been cast and counted correctly?



The Active Ownership team at Columbia Threadneedle Investments is responsible for the execution of global proxy voting on behalf of reo® clients. Columbia Threadneedle Investments has a number of established controls to ensure voting is conducted in a timely manner through the daily review of the voting queue and a 4 eyes check which reviews execution is being done correctly in advance of all vote deadlines. Another control looks at a daily report which identifies votes that are not consistent with the established policy and a review is conducted to ensure the correct analysis has been completed.

The Proxy Voting Team, which is part of the Active Ownership team, conducts these voting controls to ensure the process and policies are followed routinely. Any exceptions in voting – which are inconsistent with the established policy - are escalated to the Proxy Voting team. A review is then conducted by Active Ownership team members with dedicated corporate governance expertise. and any exceptions to the policy are decided as necessary. The votes outside of the established policy are then completed by the Proxy Voting team.

There are routine reports which are generated by the proxy voting service provider (ISS) which are reviewed by the Proxy Voting Team to monitor votes are being counted and successfully submitted.

#### STEWARDSHIP: ESCALATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 36	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Escalation	2

For your listed equity holdings, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?

### (1) Listed equity (A) Joining or broadening an existing collaborative engagement $\checkmark$ or creating a new one (B) Filing, co-filing, and/or submitting a shareholder resolution $\checkmark$ or proposal (C) Publicly engaging the entity, $\checkmark$ e.g. signing an open letter (D) Voting against the re-election $\sqrt{\phantom{a}}$ of one or more board directors (E) Voting against the chair of the board of directors, or equivalent, $\checkmark$ e.g. lead independent director



(F) Divesting	
(G) Litigation	
(H) Other	
(I) In the past three years, we did not use any of the above escalation measures for our listed equity holdings	0

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 37	CORE	Multiple, see guidance	N/A	PUBLIC	Stewardship: Escalation	2

For your corporate fixed income assets, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?

	A 1	Talled to a	an language and a serious		مرينه وسوما والموس			
<b>Ы</b> (	A)	Joining	or proadening	ı an existing	g collaborative	engagement	or creating a	a new one

☑ (B) Publicly engaging the entity, e.g. signing an open letter

☐ (C) Not investing

 $\square$  (D) Reducing exposure to the investee entity

☐ (E) Divesting

☐ (F) Litigation

☐ (G) Other

o (H) In the past three years, we did not use any of the above escalation measures for our corporate fixed income assets

#### STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39	CORE	OO 8, OO 9	PGS 39.1, PGS 39.2	PUBLIC	Stewardship: Engagement with policy makers	2

Did your organisation, or the external investment managers or service providers acting on your behalf, engage with policy makers as part of your responsible investment approach during the reporting year?

☑ (A) Yes, we engaged with policy makers directly

☑ (B) Yes, we engaged with policy makers through the leadership of or active participation in working groups or collaborative initiatives, including via the PRI



☑ (C) Yes, we were members of, supported, or were in another way affiliated with third party organisations, including trade associations and non-profit organisations, that engage with policy makers, excluding the PRI

o (D) We did not engage with policy makers directly or indirectly during the reporting year beyond our membership in the PRI

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.1	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, what methods did you, or the external investment managers or service providers acting on your behalf, use to engage with policy makers as part of your responsible investment approach?

- ☑ (A) We participated in 'sign-on' letters
- ☑ (B) We responded to policy consultations
- ☑ (C) We provided technical input via government- or regulator-backed working groups Describe:

During 2022, the reo® service provided by Columbia Threadneedle Investments played an active role in public policy development through engagement with governments and regulators on key issues, seeking to be a constructive investor voice in standard setting. In 2022 Columbia Threadneedle predominantly engaged through industry bodies and collaborative engagement initiatives. More details can be found in Columbia Threadneedle Investments 2022 Stewardship Report.

- $\square$  (D) We engaged policy makers on our own initiative
- $\square$  (E) Other methods

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.2	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, did your organisation publicly disclose details of your engagement with policy makers conducted as part of your responsible investment approach, including through external investment managers or service providers?

(A) We publicly disclosed all our policy positions Add link(s):

https://docs.columbiathreadneedle.com/documents/Columbia%20Threadneedle%20Investments%20-%20Stewardship%20Report.pdf?inline=true

- $\square$  (B) We publicly disclosed details of our engagements with policy makers
- o (C) No, we did not publicly disclose details of our engagement with policy makers conducted as part of our responsible investment approach during the reporting year



#### **CLIMATE CHANGE**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41	CORE	N/A	PGS 41.1	PUBLIC	Climate change	General

#### Has your organisation identified climate-related risks and opportunities affecting your investments?

#### ☑ (A) Yes, within our standard planning horizon

Specify the risks and opportunities identified and your relevant standard planning horizon:

Risks and opportunities related to decrease greenhouse gas emissons

- $\square$  (B) Yes, beyond our standard planning horizon
- o (C) No, we have not identified climate-related risks and/or opportunities affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41.1	CORE	PGS 41	N/A	PUBLIC	Climate change	General

Does your organisation integrate climate-related risks and opportunities affecting your investments in its overall investment strategy, financial planning and (if relevant) products?

## ● (A) Yes, our overall investment strategy, financial planning and (if relevant) products integrate climate-related risks and opportunities

Describe how climate-related risks and opportunities have affected or are expected to affect your investment strategy, financial planning and (if relevant) products:

Our three goals are: 1. By 2050, we finance zero greenhouse gas emissions with our investments. 2. By 2030, the greenhouse gas emissions we finance with our investments will be half. 3. We will increasingly invest in climate solutions.

Equities and corporate bonds first

We begin with stocks and corporate bonds.

Because these investments together represent nearly 45% of our total invested assets. Instead of the benchmarks, or "yardsticks," that investors usually use, we switch to special yardsticks: the 'EU low carbon benchmarks'. These special benchmarks help us to make our make our investments climate-friendly more quickly. We will make this switch in the first half of 2023. We stipulate in our agreements with the investment manager that the emissions of greenhouse gases that we finance with our equities and corporate bonds at any time must be 30% lower than that of the regular benchmark.



We also stipulate that greenhouse gas emissions must be at least 25% lower in 2025 than in 2020 and in 2030 at least 50% lower.

#### Then the other types of investments

Next, we move on to the other types of investments. Which type of investment we then start depends on several factors:- whether there are good measurements of greenhouse gas emissions- whether there are good methods for monitoring whether we achieve our goals- How large the assets invested in the type of investment are.

Ultimately, we can ensure that at least two-thirds of all our investments meet the agreements in the Climate Accord. For the rest of the portfolio this is not yet possible.

#### Supporting goals

In the comprehensive action plan, we have developed our three goals into smaller, supporting goals. These are for internal use and so we do not publish them.

It is an tool for the board to assess whether the implementation of our action plan is going well. For example, we want to have a certain percentage of investments in companies and governments and mortgage lenders that are working hard to reduce their emissions of greenhouse gases. Ideally, we then increase that percentage. If it is necessary and makes sense, we ask our investment manager to engage with such a company, as an active shareholder. Because we want our investments to have a positive influence on the "real world. So we would rather engage in dialogue than stop investing in companies.

This is called "engagement. The focus of our engagement is on companies with high greenhouse gas emissions have. We encourage these companies to reduce their emissions. So that they meet the requirements of the Climate Agreement. In doing so, we do not forget our social goals! We precisely want a socially just transition to a more climate-friendly economy.

#### Green investments

Since 2016, we have been investing in "green bonds" and "sustainability bonds.

These are bonds of companies or development banks or governments that invest the money they borrow in green, climate or sustainability projects. In recent years, we have invested more in these bonds.

o (B) No, our organisation has not yet integrated climate-related risks and opportunities into its investment strategy, financial planning and (if relevant) products

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 42	PLUS	N/A	N/A	PUBLIC	Climate change	General

#### Which sectors are covered by your organisation's strategy addressing high-emitting sectors?

☐ (A) Coal
□ (B) Gas
□ (C) Oil
☐ (D) Utilities
☐ (E) Cement
☐ (F) Steel
☐ (G) Aviation
$\square$ (H) Heavy duty road
$\square$ (I) Light duty road
☐ (J) Shipping
☐ (K) Aluminium
☐ (L) Agriculture, forestry, fishery
$\square$ (M) Chemicals
$\square$ (N) Construction and buildings
$\square$ (O) Textile and leather
$\square$ (P) Water
☐ (Q) Other
O (D) We do not be seen a strete me address since binds annitting and

● (R) We do not have a strategy addressing high-emitting sectors



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 43	CORE	N/A	N/A	PUBLIC	Climate change	General

Has your organisation assessed the resilience of its investment strategy in different climate scenarios, including one in which the average temperature rise is held to below 2 degrees Celsius (preferably to 1.5 degrees Celsius) above preindustrial levels?

$\Box$ (A	) Yes	. usina the	Inevitable	Policy R	esponse	Forecast	Policy S	Scenario	(FPS)	or Real	ired Poli	icy Scenario	(RPS)
_ (	, , , ,	, asing the	IIIC VILABIC	i Onoy ix	coponiac	orcoust	i Olloy C	ochano	(	or recyc		icy Cochanic	(111 0)

 $\Box$  (B) Yes, using the One Earth Climate Model scenario

☐ (C) Yes, using the International Energy Agency (IEA) Net Zero scenario

☑ (D) Yes, using other scenarios

Specify:

Scenarios provided by our ALM consultant

• (E) No, we have not assessed the resilience of our investment strategy in different climate scenarios, including one that holds temperature rise to below 2 degrees

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 44	CORE	N/A	N/A	PUBLIC	Climate change	General

Does your organisation have a process to identify, assess, and manage the climate-related risks (potentially) affecting your investments?

 $\square$  (A) Yes, we have a process to identify and assess climate-related risks

 $\square$  (B) Yes, we have a process to manage climate-related risks

(C) No, we do not have any processes to identify, assess, or manage the climate-related risks affecting our investments

Explain why: (Voluntary)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 45	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, which of the following climate risk metrics or variables affecting your investments did your organisation use and disclose?

$\square$ (A) Exposure to physical r
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 $\hfill\square$  (B) Exposure to transition risk

 $\square$  (C) Internal carbon price

 $\square$  (D) Total carbon emissions

☑ (E) Weighted average carbon intensity



- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
  - o (1) Metric or variable used
  - (2) Metric or variable used and disclosed
  - o (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://www.pwri.nl/over-pwri/onze-eigen-accenten

☐ (F) Avoided emissions
☐ (G) Implied Temperature Rise (ITR)
☐ (H) Non-ITR measure of portfolio alignment with UNFCCC Paris Agreement goals
☐ (I) Proportion of assets or other business activities aligned with climate-related opportunities
☐ (J) Other metrics or variables
o (K) Our organisation did not use or disclose any climate risk metrics or variables affecting our investments during the reporting
year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 46	CORE	N/A	N/A	PUBLIC	Climate change	General

### During the reporting year, did your organisation disclose its Scope 1, Scope 2, and/or Scope 3 greenhouse gas emissions?

#### ☑ (A) Scope 1 emissions

- (1) Indicate whether this metric was disclosed, including the methodology
  - **(1) Metric disclosed**
  - o (2) Metric and methodology disclosed
- (2) Provide links to the disclosed metric and methodology, as applicable

https://www.pwri.nl/over-pwri/onze-eigen-accenten

#### ☑ (B) Scope 2 emissions

- (1) Indicate whether this metric was disclosed, including the methodology
  - **(1)** Metric disclosed
  - o (2) Metric and methodology disclosed
- (2) Provide links to the disclosed metric and methodology, as applicable

https://www.pwri.nl/over-pwri/onze-eigen-accenten

- $\square$  (C) Scope 3 emissions (including financed emissions)
- o (D) Our organisation did not disclose its Scope 1, Scope 2, or Scope 3 greenhouse gas emissions during the reporting year



#### SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47	CORE	N/A	Multiple indicators	PUBLIC	Sustainability outcomes	1, 2

Has your organisation identified the intended and unintended sustainability outcomes connected to its investment activities?

- (A) Yes, we have identified one or more specific sustainability outcomes connected to our investment activities
- $\circ~$  (B) No, we have not yet identified the sustainability outcomes connected to any of our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.1	CORE	PGS 47	N/A	PUBLIC	Sustainability outcomes	1, 2

Which widely recognised frameworks has your organisation used to identify the intended and unintended sustainability outcomes connected to its investment activities?

- ☑ (A) The UN Sustainable Development Goals (SDGs) and targets
- **☑** (B) The UNFCCC Paris Agreement
- ☑ (C) The UN Guiding Principles on Business and Human Rights (UNGPs)
- ☑ (D) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- ☐ (E) The EU Taxonomy
- ☐ (F) Other relevant taxonomies
- ☐ (G) The International Bill of Human Rights
- $\Box$  (H) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- ☐ (I) The Convention on Biological Diversity
- $\square$  (J) Other international framework(s)
- ☐ (K) Other regional framework(s)
- ☐ (L) Other sectoral/issue-specific framework(s)
- o (M) Our organisation did not use any widely recognised frameworks to identify the intended and unintended sustainability outcomes connected to its investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.2	CORE	PGS 47	PGS 48	PUBLIC	Sustainability outcomes	1, 2



What are the primary methods that your organisation has used to determine the most important intended and unintended sustainability outcomes connected to its investment activities?

☑ (A) Identify sustainability outcomes that are closely linked to our core investment activities
$\square$ (B) Consult with key clients and/or beneficiaries to align with their priorities
$\square$ (C) Assess which actual or potential negative outcomes for people are most severe based on their scale, scope, and
irremediable character
$\square$ (D) Identify sustainability outcomes that are closely linked to systematic sustainability issues
$\square$ (E) Analyse the input from different stakeholders (e.g. affected communities, civil society, trade unions or similar)
$\square$ (F) Understand the geographical relevance of specific sustainability outcome objectives
☐ (G) Other method

o (H) We have not yet determined the most important sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48	CORE	PGS 47.2	PGS 48.1, SO 1	PUBLIC	Sustainability outcomes	1, 2

Has your organisation taken action on any specific sustainability outcomes connected to its investment activities, including to prevent and mitigate actual and potential negative outcomes?

- (A) Yes, we have taken action on some of the specific sustainability outcomes connected to our investment activities
- o (B) No, we have not yet taken action on any specific sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48.1	PLUS	PGS 48	N/A	PUBLIC	Sustainability outcomes	1, 2

Why has your organisation taken action on specific sustainability outcomes connected to its investment activities?

- ☑ (A) We believe that taking action on sustainability outcomes is relevant to our financial risks and returns over both short- and long-term horizons
- ☑ (B) We believe that taking action on sustainability outcomes, although not yet relevant to our financial risks and returns, will become so over a long-time horizon
- $\square$  (C) We have been requested to do so by our clients and/or beneficiaries
- $\Box$  (D) We want to prepare for and respond to legal and regulatory developments that are increasingly addressing sustainability outcomes
- $\Box$  (E) We want to protect our reputation, particularly in the event of negative sustainability outcomes connected to investments
- ✓ (F) We want to enhance our social licence-to-operate (i.e. the trust of beneficiaries, clients, and other stakeholders)
- ☑ (G) We believe that taking action on sustainability outcomes in parallel to financial return goals has merit in its own right
- ☐ (H) Other



#### **HUMAN RIGHTS**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 50	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

During the reporting year, did your organisation, directly or through influence over investees, enable access to remedy for people affected by negative human rights outcomes connected to your investment activities?

 $\Box$  (A) Yes, we enabled access to remedy directly for people affected by negative human rights outcomes we caused or contributed to through our investment activities

☑ (B) Yes, we used our influence to ensure that our investees provided access to remedies for people affected by negative human rights outcomes we were linked to through our investment activities

Describe:

With reference to the UN Guiding Principles, assessing and encouraging action on access to remedy forms part of our engagement dialogue with issuers identified as at heightened risk of implication in human rights violations.

o (C) No, we did not enable access to remedy directly, or through the use of influence over investees, for people affected by negative human rights outcomes connected to our investment activities during the reporting year

# MANAGER SELECTION, APPOINTMENT AND MONITORING (SAM)

#### **OVERALL APPROACH**

#### **EXTERNAL INVESTMENT MANAGERS**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 1	CORE	00 21	N/A	PUBLIC	External investment managers	4

For the majority of your externally managed AUM in each asset class, which responsible investment aspects does your organisation consider important in the assessment of external investment managers?



(2) Listed equity (passive)	(3) Fixed income (active)	(4) Fixed income (passive)
Ø	Ø	☑
Ø	Ø	Ø
Ø	Ø	Ø
Z	☑	Ø
Ø	Ø	Ø
Ø	Ø	☑
Ø	Ø	☑
Ø	Ø	☑
Ø	Ø	Ø
	(passive)	(passive) (active)  (



(J) Policy(ies) or guidelines on (proxy) voting	<b></b>	☑	
(K) Use of stewardship tools and activities	Ø		Ø
(L) Incorporation of risks connected to systematic sustainability issues in stewardship practices			
(M) Involvement in collaborative engagement and stewardship initiatives			
(N) Engagement with policy makers and other non-investee stakeholders			
(O) Results of stewardship activities	Ø		Ø
Performance and Reporting			
(P) ESG disclosure in regular client reporting	Ø		Ø
(Q) Inclusion of ESG factors in contractual agreements	Ø		Ø
(R) We do not consider any of the above responsible investment aspects important in the assessment of external investment managers	ο	0	0



#### SERVICE PROVIDERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 2	CORE	00 21	N/A	PUBLIC	Service providers	4

Which responsible investment aspects does your organisation consider important when assessing all service providers that advise you in the selection, appointment and/or monitoring of external investment managers?

- ☑ (A) Incorporation of their responsible investment policy into advisory services
- ☑ (B) Ability to accommodate our responsible investment policy
- ☑ (C) Level of staff's responsible investment expertise
- ☑ (D) Use of data and analytical tools to assess the external investment manager's responsible investment performance
- ☐ (E) Other
- o (F) We do not consider any of the above responsible investment aspects important when assessing service providers that advise us in the selection, appointment and/or monitoring of external investment managers
- o (G) Not applicable; we do not engage service providers in the selection, appointment or monitoring of external investment managers

#### **SELECTION**

#### RESPONSIBLE INVESTMENT PRACTICES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 4	CORE	00 12, 00 21	SAM 5, SAM 6, SAM 7	PUBLIC	Responsible investment practices	General

During the reporting year, did your organisation select new external investment managers or allocate new mandates to existing investment managers?

- (A) Yes, we selected external investment managers or allocated new mandates to existing investment managers during the reporting year
- o (B) No, we did not select new external investment managers or allocate new mandates to existing investment managers during the reporting year
- o (C) Not applicable; our organisation is in a captive relationship with external investment managers, which applies to 90% or more of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 5	CORE	SAM 4	N/A	PUBLIC	Responsible investment practices	4



During the reporting year, what responsible investment aspects did your organisation, or the service provider acting on your behalf, review and evaluate when selecting new external investment managers or allocating new mandates to existing investment managers?

#### Organisation

☑ (A) Commitment to and experience in responsible investment (e.g. commitment to responsible investment principles and standards)

Select from dropdown list

- (1) for all of our mandates
- o (2) for a majority of our mandates
- o (3) for a minority of our mandates

☑ (B) Responsible investment policy(ies) (e.g. the alignment of their responsible investment policy with the investment mandate)

Select from dropdown list

- (1) for all of our mandates
- o (2) for a majority of our mandates
- o (3) for a minority of our mandates

☑ (C) Governance structure and senior-level oversight and accountability (e.g. the adequacy of their governance structure and reported conflicts of interest)

Select from dropdown list

- (1) for all of our mandates
- o (2) for a majority of our mandates
- o (3) for a minority of our mandates

#### **People and Culture**

☑ (D) Adequate resourcing and incentives (e.g. their team structures, operating model and remuneration structure, including alignment of interests)

Select from dropdown list

- (1) for all of our mandates
- o (2) for a majority of our mandates
- o (3) for a minority of our mandates

☑ (E) Staff competencies and experience in responsible investment (e.g. level of responsible investment responsibilities in their investment team, their responsible investment training and capacity building)

Select from dropdown list

- (1) for all of our mandates
- o (2) for a majority of our mandates
- o (3) for a minority of our mandates

#### **Investment Process**

☑ (F) Incorporation of material ESG factors in the investment process (e.g. detail and evidence of how such factors are incorporated into the selection of individual assets and in portfolio construction)

Select from dropdown list

- o (2) for a majority of our mandates
- o (3) for a minority of our mandates

☑ (G) Incorporation of risks connected to systematic sustainability issues in the investment process (e.g. detail and evidence of how such risks are incorporated into the selection of individual assets and in portfolio construction)

Select from dropdown list

- o (2) for a majority of our mandates
- o (3) for a minority of our mandates



☑ (H) Incorporation of material ESG factors and ESG risks connected to systematic sustainability issues in portfolio risk assessment (e.g. their process to measure and report such risks)

Select from dropdown list

- o (2) for a majority of our mandates
- o (3) for a minority of our mandates

#### **Performance and Reporting**

☑ (I) ESG disclosure in regular client reporting

Select from dropdown list

- (1) for all of our mandates
- o (2) for a majority of our mandates
- o (3) for a minority of our mandates
- ☑ (J) Inclusion of ESG factors in contractual agreements

Select from dropdown list

- (1) for all of our mandates
- o (2) for a majority of our mandates
- o (3) for a minority of our mandates
- (K) We did not review and evaluate any of the above responsible investment aspects when selecting new external investment managers or allocating new mandates to existing investment managers during the reporting year

#### **STEWARDSHIP**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 6	CORE	OO 8, SAM 4	N/A	PUBLIC	Stewardship	4

During the reporting year, which aspects of the stewardship approach did your organisation, or the service provider acting on your behalf, review and evaluate when selecting new external investment managers or allocating new mandates to existing investment managers?

☑ (A) The alignment of their policy(ies) or guidelines on stewardship with the investment mandate

Select from dropdown list

- (1) for all of our mandates
- o (2) for a majority of our mandates
- o (3) for a minority of our mandates
- ☑ (B) Evidence of how they implemented their stewardship objectives, including the effectiveness of their activities

Select from dropdown list

- o (1) for all of our mandates
- o (3) for a minority of our mandates
- ☑ (C) Their participation in collaborative engagements and stewardship initiatives

Select from dropdown list

- o (2) for a majority of our mandates
- o (3) for a minority of our mandates
- $\square$  (D) Details of their engagements with companies or issuers on risks connected to systematic sustainability issues

Select from dropdown list

- o (1) for all of our mandates
- o (2) for a majority of our mandates
- ☑ (E) Details of their engagement activities with policy makers



Select from dropdown list

- o (1) for all of our mandates
- o (2) for a majority of our mandates
- (3) for a minority of our mandates
- ☑ (F) Their escalation process and the escalation tools included in their policy on stewardship

Select from dropdown list

- o (1) for all of our mandates
- o (2) for a majority of our mandates
- (3) for a minority of our mandates
- (G) We did not review and evaluate any of the above aspects of the stewardship approach when selecting new external investment managers or allocating new mandates to existing investment managers during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 7	CORE	OO 9, SAM 4	N/A	PUBLIC	Stewardship	4

During the reporting year, which aspects of (proxy) voting did your organisation, or the service provider acting on your behalf, review and evaluate when selecting new external investment managers or allocating new mandates to existing investment managers?

- ☐ (A) The alignment of their policy(ies) or guidelines on (proxy) voting with the investment mandate
- ☐ (B) Historical information on the number or percentage of general meetings at which they voted
- $\square$  (C) Analysis of votes cast for and against
- ☐ (D) Analysis of votes cast for and against resolutions related to risks connected to systematic sustainability issues
- $\square$  (E) Details of their position on any controversial and high-profile votes
- ☐ (F) Historical information of any resolutions on which they voted contrary to their own voting policy and the reasons why
- $\square$  (G) Details of all votes involving companies where the external investment manager or an affiliate has a contractual relationship or another potential conflict of interest
- (H) We did not review and evaluate any of the above aspects of (proxy) voting when selecting new external investment managers or allocating new mandates to existing investment managers during the reporting year
- (I) Not applicable; our organisation did not select new external investment managers or allocated new mandates to existing investment managers for listed equity and/or hedge funds that hold equity.

#### **APPOINTMENT**



#### SEGREGATED MANDATES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 8	CORE	OO 5.2, OO 13	N/A	PUBLIC	Segregated mandates	4

Which responsible investment aspects do your organisation, or the service provider acting on your behalf, explicitly include in clauses within your contractual agreements with your external investment managers for segregated mandates?

- ☑ (A) Their commitment to following our responsible investment strategy in the management of our assets Select from dropdown list
  - (1) for all of our segregated mandates
  - o (2) for a majority of our segregated mandates
  - o (3) for a minority of our segregated mandates
- ☑ (B) Their commitment to incorporating material ESG factors into their investment activities

Select from dropdown list

- (1) for all of our segregated mandates
- o (2) for a majority of our segregated mandates
- o (3) for a minority of our segregated mandates
- ☑ (C) Their commitment to incorporating material ESG factors into their stewardship activities

Select from dropdown list

- $\circ$  (1) for all of our segregated mandates
- o (2) for a majority of our segregated mandates
- (3) for a minority of our segregated mandates
- ☑ (D) Their commitment to incorporating risks connected to systematic sustainability issues into their investment activities

Select from dropdown list

- o (1) for all of our segregated mandates
- o (3) for a minority of our segregated mandates
- ☑ (E) Their commitment to incorporating risks connected to systematic sustainability issues into their stewardship activities

Select from dropdown list

- o (1) for all of our segregated mandates
- o (2) for a majority of our segregated mandates
- (3) for a minority of our segregated mandates
- ☑ (F) Exclusion list(s) or criteria

Select from dropdown list

- (1) for all of our segregated mandates
- o (2) for a majority of our segregated mandates
- o (3) for a minority of our segregated mandates
- (G) Responsible investment communications and reporting obligations, including stewardship activities and results

Select from dropdown list

- o (1) for all of our segregated mandates
- o (2) for a majority of our segregated mandates
- $\ensuremath{\square}$  (H) Incentives and controls to ensure alignment of interests



Select from dropdown list

- **(1)** for all of our segregated mandates
- o (2) for a majority of our segregated mandates
- o (3) for a minority of our segregated mandates
- $\square$  (I) Commitments on climate-related disclosure in line with internationally-recognised frameworks such as the TCFD
- $\square$  (J) Commitment to respect human rights as defined in the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights

Select from dropdown list

- (1) for all of our segregated mandates
- o (2) for a majority of our segregated mandates
- o (3) for a minority of our segregated mandates
- ☑ (K) Their acknowledgement that their appointment is conditional on the fulfilment of their agreed responsible investment commitments

Select from dropdown list

- o (1) for all of our segregated mandates
- o (2) for a majority of our segregated mandates
- (3) for a minority of our segregated mandates
- ☐ (L) Other
- o (M) We do not include responsible investment aspects in clauses within our contractual agreements with external investment managers for segregated mandates

#### MONITORING

#### RESPONSIBLE INVESTMENT PRACTICES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 9	CORE	OO 14, OO 21	N/A	PUBLIC	Responsible investment practices	4

For the majority of your externally managed AUM in each asset class, which aspects of your external investment managers' responsible investment practices did your organisation, or the service provider acting on your behalf, monitor during the reporting year?

	(2) Listed equity (passive)	(3) Fixed income (active)	(4) Fixed income (passive)	
Organisation				
(A) Commitment to and experience in responsible investment (e.g. commitment to responsible investment principles and standards)	Ø	Ø	Ø	



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]



(G) Incorporation of risks connected to systematic sustainability issues in the investment process (e.g. detail and evidence of how such risks are incorporated into the selection of individual assets and in portfolio construction)			☑
(H) Incorporation of material ESG factors and ESG risks connected to systematic sustainability issues in portfolio risk assessment (e.g. their process to measure and report such risks, their response to ESG incidents)	☑		☑
Performance and Reporting			
(I) ESG disclosure in regular client reporting (e.g. any changes in their regular client reporting)	Ø	Ø	✓
(J) Inclusion of ESG factors in contractual agreements	$\checkmark$		✓

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 12	CORE	OO 14, OO 21	N/A	PUBLIC	Responsible investment practices	1

For the majority of your externally managed AUM in each asset class, how often does your organisation, or the service provider acting on your behalf, monitor your external investment managers' responsible investment practices?



	(2) Listed equity (passive)	(3) Fixed income (active)	(4) Fixed income (passive)
(A) At least annually		Z	
(B) Less than once a year			
(C) On an ad hoc basis			

#### **STEWARDSHIP**

(A) Any changes in their policy(ies)

or guidelines on (proxy) voting

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 14	CORE	00 9, 00 21	N/A	PUBLIC	Stewardship	1, 2

For the majority of your AUM in each asset class where (proxy) voting is delegated to external investment managers, which aspects of your external investment managers' (proxy) voting practices did your organisation, or the service provider acting on your behalf, monitor during the reporting year?

## 

(2) Listed equity (passive)

(B) Whether their (proxy) voting	
decisions were consistent with	
their stewardship priorities as	
stated in their policy and with their	
voting policy, principles and/or	
guidelines	





(D) Whether their (proxy) voting track record was aligned with our stewardship approach and expectations	
(E) The application of their policy on securities lending and any implications for implementing their policy(ies) or guidelines on (proxy) voting (where applicable)	
(F) Other	
(G) We did not monitor our external investment managers' (proxy) voting practices during the reporting year	

#### **ENGAGEMENT AND ESCALATION**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 16	CORE	OO 14, OO 21	N/A	PUBLIC	Engagement and escalation	4

What actions does your organisation, or the service provider acting on your behalf, include in its formal escalation process to address concerns raised during monitoring of your external investment managers' responsible investment practices?

	(2) Listed equity (passive)	(3) Fixed income (active)	(4) Fixed income (passive)
(A) Engagement with their investment professionals, investment committee or other representatives	Ø	Ø	Ø
(B) Notification about their placement on a watch list or relationship coming under review			



(C) Reduction of capital allocation to the external investment managers until any concerns have been rectified			
(D) Termination of the contract if failings persist over a (notified) period, including an explanation of the reasons for termination			
(E) Holding off selecting the external investment managers for new mandates or allocating additional capital until any concerns have been rectified	☑	☑	Ø
(F) Other			
(G) Our organisation does not have a formal escalation process to address concerns raised during monitoring	0	0	0

#### **VERIFICATION**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 17	CORE	OO 14, OO 21	N/A	PUBLIC	Verification	1

For the majority of your externally managed AUM in each asset class, how did your organisation, or the service provider acting on your behalf, verify that the information reported by external investment managers on their responsible investment practices was correct during the reporting year?



	(2) Listed equity (passive)	(3) Fixed income (active)	(4) Fixed income (passive)
(A) We checked that the information reported was verified through a third-party assurance process			
(B) We checked that the information reported was verified by an independent third party			
(C) We checked for evidence of internal monitoring or compliance	Ø	Ø	☑
(D) Other			
(E) We did not verify the information reported by external investment managers on their responsible investment practices during the reporting year	0	0	0

## **CONFIDENCE-BUILDING MEASURES (CBM)**

#### **CONFIDENCE-BUILDING MEASURES**

#### APPROACH TO CONFIDENCE-BUILDING MEASURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 1	CORE	N/A	Multiple indicators	PUBLIC	Approach to confidence-building measures	6

#### How did your organisation verify the information submitted in your PRI report this reporting year?

$\square$ (A) We conducted independent third-party assurance of selected processes and/or data related to the responsible investme
processes reported in our PRI report, which resulted in a formal assurance conclusion



 $<sup>\</sup>Box$  (B) We conducted a third-party readiness review and are making changes to our internal controls or governance processes to be able to conduct independent third-party assurance next year

 $<sup>\</sup>Box$  (C) We conducted an internal audit of selected processes and/or data related to the responsible investment processes reported in our PRI report

<b>☑</b> ([	D) Our	board,	, trustees	(or ed	quivalent),	senior	executive	-level	staff (o	r equival	ent), a	and/or	investme	nt c	ommittee	(or
egui	ivalen <sup>.</sup>	t) signe	ed off on	our PF	RI report											

- $\Box$  (E) We conducted an external ESG audit of our holdings to verify that our funds comply with our responsible investment policy  $\Box$  (F) We conducted an external ESG audit of our holdings as part of risk management, engagement identification or investment decision-making
- ☑ (G) Our responses in selected sections and/or the entirety of our PRI report were internally reviewed before submission to the PRI
- o (H) We did not verify the information submitted in our PRI report this reporting year

#### INTERNAL REVIEW

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 6	CORE	CBM 1	N/A	PUBLIC	Internal review	6

#### Who in your organisation reviewed the responses submitted in your PRI report this year?

- $\square$  (A) Board, trustees, or equivalent
- ☑ (B) Senior executive-level staff, investment committee, head of department, or equivalent Sections of PRI report reviewed
  - **(1)** the entire report
  - o (2) selected sections of the report
- $\circ$  (C) None of the above internal roles reviewed selected sections or the entirety of the responses submitted in our PRI report this year

