



| LEA 02   | Discipline: Monetary  | Principle: PRI 1, 2, 3   |
|--|---|--|
| <p><b>Reason for interaction</b></p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> To support investment decisionmaking in &amp; company's material ESG issues</li> <li><input checked="" type="checkbox"/> To enhance corporate transition or identify the need for additional or other capacity</li> <li><input type="checkbox"/> We do not engage in internal staff</li> <li><input type="checkbox"/> To support investment decisionmaking in &amp; company's material ESG issues</li> <li><input type="checkbox"/> To enhance corporate transition or identify the need for additional or other capacity</li> </ul> | <p><b>Type of engagement</b></p> <p>Individual/ internal staff engagements</p> <p>Collaborative engagements</p> <p>Service provider engagements</p> | <p><b>Reason for interaction</b></p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> To support investment decisionmaking in &amp; company's material ESG issues</li> <li><input checked="" type="checkbox"/> To enhance corporate transition or identify the need for additional or other capacity</li> <li><input type="checkbox"/> We do not engage in internal staff</li> <li><input type="checkbox"/> To support investment decisionmaking in &amp; company's material ESG issues</li> <li><input type="checkbox"/> To enhance corporate transition or identify the need for additional or other capacity</li> </ul> |

# RI TRANSPARENCY REPORT

## 2020

Kieger AG

## About this report

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

This report is an export of the individual Signatory organisation's response to the PRI during the 2020 reporting cycle. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information. As a result, the reports can be extensive. However, to help easily locate information, there is a **Principles index** which highlights where the information can be found and summarises the indicators that signatories complete and disclose.

## Understanding the Principles Index

The Principles Index summarises the response status for the individual indicators and modules and shows how these relate to the six [Principles for Responsible Investment](#). It can be used by stakeholders as an 'at-a-glance' summary of reported information and to identify particular themes or areas of interest.

Indicators can refer to one or more Principles. Some indicators are not specific to any Principle. These are highlighted in the 'General' column. When multiple Principles are covered across numerous indicators, in order to avoid repetition, only the main Principle covered is highlighted.

All indicators within a module are presented below. The status of indicators is shown with the following symbols:

| Symbol | Status  |
|--------|---|
| ✓      | The signatory has completed all mandatory parts of this indicator |
| ☑      | The signatory has completed some parts of this indicator          |
| 🔒      | This indicator was not relevant for this signatory                |
| -      | The signatory did not complete any part of this indicator         |
| Ⓜ      | The signatory has flagged this indicator for internal review      |

Within the table, indicators marked in blue are mandatory to complete. Indicators marked in grey are voluntary to complete.

# Principles Index

| Organisational Overview |  |        |                              | Principle |   |   |   |   |   | General |
|-------------------------|--|--------|------------------------------|-----------|---|---|---|---|---|---------|
| Indicator               | Short description  | Status | Disclosure                   | 1         | 2 | 3 | 4 | 5 | 6 |         |
| OO TG                   |  | 🔒      | n/a                          |           |   |   |   |   |   |         |
| OO 01                   | Signatory category and services  | ✓      | Public                       |           |   |   |   |   |   | ✓       |
| OO 02                   | Headquarters and operational countries                                       | ✓      | Public                       |           |   |   |   |   |   | ✓       |
| OO 03                   | Subsidiaries that are separate PRI signatories                               | ✓      | Public                       |           |   |   |   |   |   | ✓       |
| OO 04                   | Reporting year and AUM   | ✓      | Public                       |           |   |   |   |   |   | ✓       |
| OO 05                   | Breakdown of AUM by asset class  | ✓      | Asset mix disclosed in OO 06 |           |   |   |   |   |   | ✓       |
| OO 06                   | How would you like to disclose your asset class mix                          | ✓      | Public                       |           |   |   |   |   |   | ✓       |
| OO 07                   | Fixed income AUM breakdown   | ✓      | Private                      |           |   |   |   |   |   | ✓       |
| OO 08                   | Segregated mandates or pooled funds  | ✓      | Private                      |           |   |   |   |   |   | ✓       |
| OO 09                   | Breakdown of AUM by market   | ✓      | Public                       |           |   |   |   |   |   | ✓       |
| OO 10                   | Active ownership practices for listed assets                                 | ✓      | Public                       |           |   |   |   |   |   | ✓       |
| OO 11                   | ESG incorporation practices for all assets                                   | ✓      | Public                       |           |   |   |   |   |   | ✓       |
| OO 12                   | Modules and sections required to complete                                    | ✓      | Public                       |           |   |   |   |   |   | ✓       |
| OO LE 01                | Breakdown of listed equity investments by passive and active strategies      | ✓      | Private                      |           |   |   |   |   |   | ✓       |
| OO LE 02                | Reporting on strategies that are <10% of actively managed listed equities    | 🔒      | n/a                          |           |   |   |   |   |   | ✓       |
| OO FI 01                | Breakdown of fixed income investments by passive and active strategies       | 🔒      | n/a                          |           |   |   |   |   |   | ✓       |
| OO FI 02                | Reporting on strategies that are <10% of actively managed fixed income       | 🔒      | n/a                          |           |   |   |   |   |   | ✓       |
| OO FI 03                | Fixed income breakdown by market and credit quality                          | 🔒      | n/a                          |           |   |   |   |   |   | ✓       |
| OO SAM 01               | Breakdown of externally managed investments by passive and active strategies | ✓      | Private                      |           |   |   |   |   |   | ✓       |
| OO PE 01                | Breakdown of private equity investments by strategy                          | ✓      | Public                       |           |   |   |   |   |   | ✓       |
| OO PE 02                | Typical level of ownership in private equity investments                     | ✓      | Private                      |           |   |   |   |   |   | ✓       |
| OO PR 01                | Breakdown of property investments  | 🔒      | n/a                          |           |   |   |   |   |   | ✓       |
| OO PR 02                | Breakdown of property assets by management                                   | 🔒      | n/a                          |           |   |   |   |   |   | ✓       |
| OO PR 03                | Largest property types   | 🔒      | n/a                          |           |   |   |   |   |   | ✓       |
| OO INF 01               | Breakdown of infrastructure investments                                      | 🔒      | n/a                          |           |   |   |   |   |   | ✓       |
| OO INF 02               | Breakdown of infrastructure assets by management                             | 🔒      | n/a                          |           |   |   |   |   |   | ✓       |
| OO INF 03               | Largest infrastructure sectors   | 🔒      | n/a                          |           |   |   |   |   |   | ✓       |
| OO HF 01                | Breakdown of hedge funds investments by strategies                           | 🔒      | n/a                          |           |   |   |   |   |   | ✓       |
| OO End                  | Module confirmation page   | ✓      | -                            |           |   |   |   |   |   |         |

| CCStrategy and Governance |  |        |            | Principle |   |   |   |   |   | General |
|---------------------------|--|--------|------------|-----------|---|---|---|---|---|---------|
| Indicator                 | Short description  | Status | Disclosure | 1         | 2 | 3 | 4 | 5 | 6 |         |
| SG 01                     | RI policy and coverage   | ✓      | Public     |           |   |   |   |   |   | ✓       |
| SG 01 CC                  | Climate risk   | ✓      | Private    |           |   |   |   |   |   | ✓       |
| SG 02                     | Publicly available RI policy or guidance documents                 | 🔒      | n/a        |           |   |   |   |   | ✓ |         |
| SG 03                     | Conflicts of interest  | ✓      | Public     |           |   |   |   |   |   | ✓       |
| SG 04                     | Identifying incidents occurring within portfolios                  | ✓      | Private    |           |   |   |   |   |   | ✓       |
| SG 05                     | RI goals and objectives  | ✓      | Public     |           |   |   |   |   |   | ✓       |
| SG 06                     | Main goals/objectives this year                                    | ✓      | Private    |           |   |   |   |   |   | ✓       |
| SG 07                     | RI roles and responsibilities                                      | ✓      | Public     |           |   |   |   |   |   | ✓       |
| SG 07 CC                  | Climate-issues roles and responsibilities                          | ✓      | Private    |           |   |   |   |   |   | ✓       |
| SG 08                     | RI in performance management, reward and/or personal development   | ✓      | Private    |           |   |   |   |   |   | ✓       |
| SG 09                     | Collaborative organisations / initiatives                          | ✓      | Public     |           |   |   | ✓ | ✓ |   |         |
| SG 09.2                   | Assets managed by PRI signatories                                  | ✓      | Public     | ✓         |   |   |   |   |   |         |
| SG 10                     | Promoting RI independently   | ✓      | Public     |           |   |   | ✓ |   |   |         |
| SG 11                     | Dialogue with public policy makers or standard setters             | ✓      | Private    |           |   |   | ✓ | ✓ | ✓ |         |
| SG 12                     | Role of investment consultants/fiduciary managers                  | ✓      | Public     |           |   |   | ✓ |   |   |         |
| SG 13                     | ESG issues in strategic asset allocation                           | ✓      | Public     | ✓         |   |   |   |   |   |         |
| SG 13 CC                  |  | 🔒      | n/a        |           |   |   |   |   |   | ✓       |
| SG 14                     | Long term investment risks and opportunity                         | ✓      | Private    | ✓         |   |   |   |   |   |         |
| SG 14 CC                  |  | ✓      | Private    |           |   |   |   |   |   | ✓       |
| SG 15                     | Allocation of assets to environmental and social themed areas      | ✓      | Private    | ✓         |   |   |   |   |   |         |
| SG 16                     | ESG issues for internally managed assets not reported in framework | ✓      | Public     |           |   |   |   |   |   | ✓       |
| SG 17                     | ESG issues for externally managed assets not reported in framework | ✓      | Public     |           |   |   |   |   |   | ✓       |
| SG 18                     | Innovative features of approach to RI                              | ✓      | Private    |           |   |   |   |   |   | ✓       |
| SG 19                     | Communication  | ✓      | Public     |           | ✓ |   |   |   | ✓ |         |
| SG End                    | Module confirmation page   | ✓      | -          |           |   |   |   |   |   |         |

| Indirect – Manager Selection, Appointment and Monitoring |  |        |            | Principle |   |   |   |   |   | General |
|--|--|--------|------------|-----------|---|---|---|---|---|---------|
| Indicator  | Short description  | Status | Disclosure | 1         | 2 | 3 | 4 | 5 | 6 |         |
| SAM 01   | ESG incorporation strategies   | ✓      | Public     | ✓         |   |   |   |   |   |         |
| SAM 02   | Selection processes (LE and FI)  | ✓      | Public     | ✓         |   |   |   |   |   |         |
| SAM 03   | Evaluating engagement and voting practices in manager selection (listed equity/fixed income) | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| SAM 04   | Appointment processes (listed equity/fixed income)   | 🔒      | n/a        | ✓         |   |   |   |   |   |         |
| SAM 05   | Monitoring processes (listed equity/fixed income)  | 🔒      | n/a        | ✓         |   |   |   |   |   |         |
| SAM 06   | Monitoring on active ownership (listed equity/fixed income)                                  | 🔒      | n/a        | ✓         |   |   |   |   |   |         |
| SAM 07   | Percentage of (proxy) votes  | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| SAM 08   | Percentage of externally managed assets managed by PRI signatories                           | ✓      | Private    | ✓         |   |   |   |   |   |         |
| SAM 09   | Examples of ESG issues in selection, appointment and monitoring processes                    | ✓      | Public     | ✓         |   |   |   |   | ✓ |         |
| SAM End  | Module confirmation page   | ✓      | -          |           |   |   |   |   |   |         |

| Direct - Listed Equity Incorporation |  |        |            | Principle |   |   |   |   |   | General |
|--------------------------------------|--|--------|------------|-----------|---|---|---|---|---|---------|
| Indicator                            | Short description  | Status | Disclosure | 1         | 2 | 3 | 4 | 5 | 6 |         |
| LEI 01                               | Percentage of each incorporation strategy                                    | ✓      | Private    | ✓         |   |   |   |   |   |         |
| LEI 02                               | Type of ESG information used in investment decision                          | ✓      | Private    | ✓         |   |   |   |   |   |         |
| LEI 03                               | Information from engagement and/or voting used in investment decision-making | -      | n/a        | ✓         |   |   |   |   |   |         |
| LEI 04                               | Types of screening applied   | ✓      | Public     | ✓         |   |   |   |   |   |         |
| LEI 05                               | Processes to ensure screening is based on robust analysis                    | ✓      | Public     | ✓         |   |   |   |   |   |         |
| LEI 06                               | Processes to ensure fund criteria are not breached                           | ✓      | Private    | ✓         |   |   |   |   |   |         |
| LEI 07                               | Types of sustainability thematic funds/mandates                              | 🔒      | n/a        | ✓         |   |   |   |   |   |         |
| LEI 08                               | Review ESG issues while researching companies/sectors                        | ✓      | Public     | ✓         |   |   |   |   |   |         |
| LEI 09                               | Processes to ensure integration is based on robust analysis                  | ✓      | Public     | ✓         |   |   |   |   |   |         |
| LEI 10                               | Aspects of analysis ESG information is integrated into                       | ✓      | Private    | ✓         |   |   |   |   |   |         |
| LEI 11                               | ESG issues in index construction   | 🔒      | n/a        | ✓         |   |   |   |   |   |         |
| LEI 12                               | How ESG incorporation has influenced portfolio composition                   | ✓      | Private    | ✓         |   |   |   |   |   |         |
| LEI 13                               | Examples of ESG issues that affected your investment view / performance      | -      | n/a        | ✓         |   |   |   |   |   |         |
| LEI End                              | Module confirmation page   | ✓      | -          |           |   |   |   |   |   |         |

| Direct - Listed Equity Active Ownership |  |        |            | Principle |   |   |   |   |   | General |
|---|--|--------|------------|-----------|---|---|---|---|---|---------|
| Indicator                               | Short description  | Status | Disclosure | 1         | 2 | 3 | 4 | 5 | 6 |         |
| LEA 01                                  | Description of approach to engagement  | ✓      | Public     |           | ✓ |   |   |   |   |         |
| LEA 02                                  | Reasoning for interaction on ESG issues                                      | ✓      | Public     | ✓         | ✓ | ✓ |   |   |   |         |
| LEA 03                                  | Process for identifying and prioritising engagement activities               | ✓      | Public     |           | ✓ |   |   |   |   |         |
| LEA 04                                  | Objectives for engagement activities   | ✓      | Public     |           | ✓ |   |   |   |   |         |
| LEA 05                                  | Process for identifying and prioritising collaborative engagement            | ✓      | Public     |           | ✓ |   |   |   |   |         |
| LEA 06                                  | Role in engagement process   | ✓      | Public     |           | ✓ |   | ✓ |   |   |         |
| LEA 07                                  | Share insights from engagements with internal/external managers              | ✓      | Private    | ✓         | ✓ |   |   |   |   |         |
| LEA 08                                  | Tracking number of engagements   | ✓      | Public     |           | ✓ |   |   |   |   |         |
| LEA 09                                  | Number of companies engaged with, intensity of engagement and effort         | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA 10                                  | Engagement methods   | ✓      | Private    |           | ✓ |   |   |   |   |         |
| LEA 11                                  | Examples of ESG engagements  | -      | n/a        |           | ✓ |   |   |   |   |         |
| LEA 12                                  | Typical approach to (proxy) voting decisions                                 | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA 13                                  | Percentage of voting recommendations reviewed                                | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA 14                                  | Securities lending programme   | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA 15                                  | Informing companies of the rationale of abstaining/voting against management | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA 16                                  | Informing companies of the rationale of abstaining/voting against management | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA 17                                  | Percentage of (proxy) votes cast   | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA 18                                  | Proportion of ballot items that were for/against/abstentions                 | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA 19                                  | Proportion of ballot items that were for/against/abstentions                 | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA 20                                  | Shareholder resolutions  | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA 21                                  | Examples of (proxy) voting activities  | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA End                                 | Module confirmation page   | ✓      | -          |           |   |   |   |   |   |         |

| Confidence building measures |                                    |        |            | Principle |   |   |   |   |   | General |
|------------------------------|------------------------------------|--------|------------|-----------|---|---|---|---|---|---------|
| Indicator                    | Short description                  | Status | Disclosure | 1         | 2 | 3 | 4 | 5 | 6 |         |
| CM1 01                       | Assurance, verification, or review | ✓      | Public     |           |   |   |   |   |   | ✓       |
| CM1 02                       | Assurance of last year`s PRI data  | ✓      | Public     |           |   |   |   |   |   | ✓       |
| CM1 03                       | Other confidence building measures | ✓      | Public     |           |   |   |   |   |   | ✓       |
| CM1 04                       | Assurance of this year`s PRI data  | ✓      | Public     |           |   |   |   |   |   | ✓       |
| CM1 05                       | External assurance                 | 🔒      | n/a        |           |   |   |   |   |   | ✓       |
| CM1 06                       | Assurance or internal audit        | 🔒      | n/a        |           |   |   |   |   |   | ✓       |
| CM1 07                       | Internal verification              | ✓      | Public     |           |   |   |   |   |   | ✓       |
| CM1 01 End                   | Module confirmation page           | ✓      | -          |           |   |   |   |   |   |         |

# Kieger AG

## Reported Information

### Public version

### Organisational Overview

## PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.



## Basic information

OO 01

Mandatory

Public

Gateway/Peering

General

OO 01.1

Select the services and funds you offer

| Select the services and funds you offer                  | % of asset under management (AUM) in ranges   |
|--|---|
| Fund management  | <input type="radio"/> 0%<br><input type="radio"/> <10%<br><input checked="" type="radio"/> 10-50%<br><input type="radio"/> >50% |
| Fund of funds, manager of managers, sub-advised products | <input type="radio"/> 0%<br><input type="radio"/> <10%<br><input type="radio"/> 10-50%<br><input checked="" type="radio"/> >50% |
| Other  | <input checked="" type="radio"/> 0%<br><input type="radio"/> <10%<br><input type="radio"/> 10-50%<br><input type="radio"/> >50% |
| Total 100%   |   |

Further options (may be selected in addition to the above)

- Hedge funds
- Fund of hedge funds

OO 02

Mandatory

Public

Peering

General

OO 02.1

Select the location of your organisation's headquarters.

Switzerland

OO 02.2

Indicate the number of countries in which you have offices (including your headquarters).

- 1
- 2-5
- 6-10
- >10

**OO 02.3** Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).

FTE

34

**OO 03** **Mandatory** **Public** **Descriptive** **General**

**OO 03.1** Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.

- Yes
- No

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

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

31/12/2019

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

Include the AUM of subsidiaries, but exclude advisory/execution only assets, and exclude the assets of your PRI signatory subsidiaries that you have chosen not to report on in OO 03.2

|               | trillions | billions | millions | thousands | hundreds |
|---------------|-----------|----------|----------|-----------|----------|
| Total AUM     |           | 2        | 250      | 000       | 000      |
| Currency      | USD       |          |          |           |          |
| Assets in USD |           | 2        | 250      | 000       | 000      |

Not applicable as we are in the fund-raising process

**OO 04.4** Indicate the assets which are subject to an execution and/or advisory approach. Provide this figure based on the end of your reporting year

Not applicable as we do not have any assets under execution and/or advisory approach

|                |   |
|----------------|---|
| <b>OO 06.1</b> | Select how you would like to disclose your asset class mix. |
|----------------|---|

- as percentage breakdown
- as broad ranges

|                     | Internally managed (%) | Externally managed (%) |
|---------------------|------------------------|------------------------|
| Listed equity       | 10-50%                 | 10-50%                 |
| Fixed income        | 0                      | 10-50%                 |
| Private equity      | <10%                   | <10%                   |
| Property            | 0                      | <10%                   |
| Infrastructure      | 0                      | 0                      |
| Commodities         | 0                      | <10%                   |
| Hedge funds         | 0                      | <10%                   |
| Fund of hedge funds | 0                      | <10%                   |
| Forestry            | 0                      | 0                      |

|                          |   |      |
|--------------------------|---|------|
| Farmland                 | 0 | 0    |
| Inclusive finance        | 0 | <10% |
| Cash                     | 0 | <10% |
| Money market instruments | 0 | 0    |
| Other (1), specify       | 0 | 0    |
| Other (2), specify       | 0 | 0    |

**OO 06.2** Publish asset class mix as per attached image [Optional].

**OO 06.3** Indicate whether your organisation has any off-balance sheet assets [Optional].

- Yes
- No

**OO 06.5** Indicate whether your organisation uses fiduciary managers.

- Yes, we use a fiduciary manager and our response to OO 5.1 is reflective of their management of our assets.
- No, we do not use fiduciary managers.

**OO 09** **Mandatory** **Public** **Peering** **General**

**OO 09.1** Indicate the breakdown of your organisation's AUM by market.

|                   |             |
|-------------------|-------------|
| Developed Markets | 94          |
| Emerging Markets  | 5           |
| Frontier Markets  | 1           |
| Other Markets     | 0           |
| <b>Total 100%</b> | <b>100%</b> |

## Asset class implementation gateway indicators

OO 10

Mandatory

Public

Gateway

General

OO 10.1

Select the active ownership activities your organisation implemented in the reporting year.

### Listed equity – engagement

- We engage with companies on ESG factors via our staff, collaborations or service providers.
- We require our external managers to engage with companies on ESG factors on our behalf.
- We do not engage directly and do not require external managers to engage with companies on ESG factors.

### Listed equity – voting

- We cast our (proxy) votes directly or via dedicated voting providers
- We require our external managers to vote on our behalf.
- We do not cast our (proxy) votes directly and do not require external managers to vote on our behalf

OO 10.3

Indicate why you do not cast your votes

- Indicate why you do not cast your votes

We have not implemented a framework for this type of engagement yet but have plans to do so.

- We do not cast our votes but provide substantive research and voting recommendations to our clients.

### Fixed income SSA – engagement

- We engage with SSA bond issuers on ESG factors via our staff, collaborations or service providers.
- We require our external managers to engage with SSA bond issuers on ESG factors on our behalf.
- We do not engage directly and do not require external managers to engage with SSA bond issuers on ESG factors. Please explain why you do not.

Please explain why you do not engage directly and do not require external managers to engage with companies on ESG factors.

We have not implemented a framework for this type of engagement yet but have plans to do so.

### Fixed income Corporate (financial) – engagement

- We engage with companies on ESG factors via our staff, collaborations or service providers.
- We require our external managers to engage with companies on ESG factors on our behalf.
- We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.

Please explain why you do not engage directly and do not require external managers to engage with companies on ESG factors.

We have not implemented a framework for this type of engagement yet but have plans to do so.

Fixed income Corporate (non-financial) – engagement

- We engage with companies on ESG factors via our staff, collaborations or service providers.
- We require our external managers to engage with companies on ESG factors on our behalf.
- We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.

Please explain why you do not engage directly and do not require external managers to engage with companies on ESG factors.

We have not implemented a framework for this type of engagement yet but have plans to do so.

Fixed income Corporate (securitised) – engagement

- We engage with companies on ESG factors via our staff, collaborations or service providers.
- We require our external managers to engage with companies on ESG factors on our behalf.
- We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.

Please explain why you do not engage directly and do not require external managers to engage with companies on ESG factors.

We have not implemented a framework for this type of engagement yet but have plans to do so.

|       |           |        |         |         |
|-------|-----------|--------|---------|---------|
| OO 11 | Mandatory | Public | Gateway | General |
|-------|-----------|--------|---------|---------|

OO 11.1

Select the internally managed asset classes in which you addressed ESG incorporation into your investment decisions and/or your active ownership practices (during the reporting year).

Listed equity

- We address ESG incorporation.
- We do not do ESG incorporation.

Private equity

- We address ESG incorporation.
- We do not do ESG incorporation.

OO 11.2

Select the externally managed assets classes in which you and/or your investment consultants address ESG incorporation in your external manager selection, appointment and/or monitoring processes.

| Asset class                              | ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes   |
|--|---|
| Listed equity                            | <p data-bbox="571 342 1474 423">Listed equity - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p data-bbox="571 439 1294 465"><input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p data-bbox="571 481 1331 508"><input type="checkbox"/> We incorporate ESG into our external manager appointment process</p> <p data-bbox="571 524 1310 551"><input type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p data-bbox="571 566 948 593"><input type="checkbox"/> We do not do ESG incorporation</p>  |
| Fixed income - SSA                       | <p data-bbox="571 656 1474 736">Fixed income - SSA - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p data-bbox="571 752 1294 779"><input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p data-bbox="571 795 1374 853"><input checked="" type="checkbox"/> We invest only in pooled funds and external manager appointment is not applicable</p> <p data-bbox="571 869 1310 896"><input type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p data-bbox="571 911 948 938"><input type="checkbox"/> We do not do ESG incorporation</p>                                 |
| Fixed income - corporate (financial)     | <p data-bbox="571 996 1474 1099">Fixed income - corporate (financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p data-bbox="571 1122 1294 1149"><input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p data-bbox="571 1164 1374 1223"><input checked="" type="checkbox"/> We invest only in pooled funds and external manager appointment is not applicable</p> <p data-bbox="571 1238 1310 1265"><input type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p data-bbox="571 1281 948 1308"><input type="checkbox"/> We do not do ESG incorporation</p>      |
| Fixed income - corporate (non-financial) | <p data-bbox="571 1366 1474 1469">Fixed income - corporate (non-financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p data-bbox="571 1491 1294 1518"><input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p data-bbox="571 1534 1374 1592"><input checked="" type="checkbox"/> We invest only in pooled funds and external manager appointment is not applicable</p> <p data-bbox="571 1608 1310 1635"><input type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p data-bbox="571 1650 948 1677"><input type="checkbox"/> We do not do ESG incorporation</p> |
| Fixed income - securitised               | <p data-bbox="571 1736 1474 1816">Fixed income - securitised - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p data-bbox="571 1832 1294 1859"><input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p data-bbox="571 1874 1374 1933"><input checked="" type="checkbox"/> We invest only in pooled funds and external manager appointment is not applicable</p> <p data-bbox="571 1948 1310 1975"><input type="checkbox"/> We incorporate ESG into our external manager monitoring process</p>  |

|                     |   |
|---------------------|---|
|                     | <input type="checkbox"/> We do not do ESG incorporation   |
| Private equity      | <div style="background-color: #0070C0; color: white; padding: 5px;">Private equity - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</div> <input type="checkbox"/> We incorporate ESG into our external manager selection process<br><input type="checkbox"/> We incorporate ESG into our external manager appointment process<br><input type="checkbox"/> We invest only in pooled funds and external manager appointment is not applicable<br><input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process<br><input type="checkbox"/> We do not do ESG incorporation |
| Property            | <div style="background-color: #0070C0; color: white; padding: 5px;">Property - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</div> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process<br><input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process<br><input type="checkbox"/> We incorporate ESG into our external manager monitoring process<br><input type="checkbox"/> We do not do ESG incorporation  |
| Commodities         | <div style="background-color: #0070C0; color: white; padding: 5px;">Commodities - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</div> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process<br><input checked="" type="checkbox"/> We invest only in pooled funds and external manager appointment is not applicable<br><input type="checkbox"/> We incorporate ESG into our external manager monitoring process<br><input type="checkbox"/> We do not do ESG incorporation  |
| Hedge funds         | <div style="background-color: #0070C0; color: white; padding: 5px;">Hedge funds - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</div> <input type="checkbox"/> We incorporate ESG into our external manager selection process<br><input type="checkbox"/> We incorporate ESG into our external manager appointment process<br><input type="checkbox"/> We invest only in pooled funds and external manager appointment is not applicable<br><input type="checkbox"/> We incorporate ESG into our external manager monitoring process<br><input checked="" type="checkbox"/> We do not do ESG incorporation    |
| Fund of hedge funds | <div style="background-color: #0070C0; color: white; padding: 5px;">Fund of hedge funds - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</div> <input type="checkbox"/> We incorporate ESG into our external manager selection process<br><input type="checkbox"/> We incorporate ESG into our external manager appointment process<br><input type="checkbox"/> We invest only in pooled funds and external manager appointment is not applicable<br><input type="checkbox"/> We incorporate ESG into our external manager monitoring process  |



|                   |  |
|-------------------|--|
|                   | <input checked="" type="checkbox"/> We do not do ESG incorporation   |
| Inclusive finance | <div style="background-color: #0070C0; color: white; padding: 5px;">Inclusive finance - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</div> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process<br><input checked="" type="checkbox"/> We invest only in pooled funds and external manager appointment is not applicable<br><input type="checkbox"/> We incorporate ESG into our external manager monitoring process<br><input type="checkbox"/> We do not do ESG incorporation |
| Cash              | <div style="background-color: #0070C0; color: white; padding: 5px;">Cash - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</div> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process<br><input checked="" type="checkbox"/> We invest only in pooled funds and external manager appointment is not applicable<br><input type="checkbox"/> We incorporate ESG into our external manager monitoring process<br><input type="checkbox"/> We do not do ESG incorporation              |

**OO 11.3b** If your organisation does not integrate ESG factors into investment decisions on your externally managed assets, explain why not.

In the case of Hedge Funds and Funds of Hedge Funds, we do not believe that ESG criteria have a wide-enough acceptance to allow us to meaningfully evaluate funds' ability to incorporate ESG factors. For Private Equity, we are in the process of adding ESG criteria to our fund selection process.

**OO 11.4** Provide a brief description of how your organisation includes responsible investment considerations in your investment manager selection, appointment and monitoring processes.

We examine prospective managers' philosophy of and commitment to responsible investment. We evaluate the holdings of prospective managers and then monitor the assets as they change.

**OO 11.5** For your externally managed pooled funds, describe any mechanisms in place to set expectations as part of the appointment or commitment process.

We have not changed or added externally managed pooled funds in the past year. During the next round of a fund search, we will put a mechanism in place.

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

**OO 12.1** Below are all applicable modules or sections you may report on. Those which are mandatory to report (asset classes representing 10% or more of your AUM) are already ticked and read-only. Those which are voluntary to report on can be opted into by ticking the box.

Core modules

- Organisational Overview
- Strategy and Governance

RI implementation directly or via service providers

Direct - Listed Equity incorporation

- Listed Equity incorporation

Direct - Listed Equity active ownership

- Engagements

Direct - Other asset classes with dedicated modules

- Private Equity

RI implementation via external managers

Indirect - Selection, Appointment and Monitoring of External Managers

- Listed Equities
- Fixed income - SSA
- Fixed income - Corporate (financial)
- Fixed income - Corporate (non-financial)
- Fixed income - Securitised
- Private Equity
- Property
- Inclusive Finance

Closing module

- Closing module

Peering questions

|          |           |        |             |         |
|----------|-----------|--------|-------------|---------|
| OO PE 01 | Mandatory | Public | Descriptive | General |
|----------|-----------|--------|-------------|---------|

|            |  |
|------------|--|
| OO PE 01.1 | Provide a breakdown of your organisation's internally managed private equity investments by investment strategy. |
|------------|--|

| Investment strategy                      | Percentage of your internally managed private equity holdings (in terms of AUM)   |
|--|---|
| Venture capital                          | <input type="radio"/> >50%<br><input type="radio"/> 10-50%<br><input type="radio"/> <10%<br><input checked="" type="radio"/> 0% |
| Growth capital                           | <input type="radio"/> >50%<br><input checked="" type="radio"/> 10-50%<br><input type="radio"/> <10%<br><input type="radio"/> 0% |
| (Leveraged) buy-out                      | <input checked="" type="radio"/> >50%<br><input type="radio"/> 10-50%<br><input type="radio"/> <10%<br><input type="radio"/> 0% |
| Distressed/Turnaround/Special Situations | <input type="radio"/> >50%<br><input type="radio"/> 10-50%<br><input type="radio"/> <10%<br><input checked="" type="radio"/> 0% |
| Secondaries                              | <input type="radio"/> >50%<br><input type="radio"/> 10-50%<br><input type="radio"/> <10%<br><input checked="" type="radio"/> 0% |
| Other investment strategy, specify (1)   | <input type="radio"/> >50%<br><input type="radio"/> 10-50%<br><input type="radio"/> <10%<br><input checked="" type="radio"/> 0% |
| Other investment strategy, specify (2)   | <input type="radio"/> >50%<br><input type="radio"/> 10-50%<br><input type="radio"/> <10%<br><input checked="" type="radio"/> 0% |
| Total 100%                               |   |

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Strategy and Governance

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## Investment policy

|       |           |        |               |         |
|-------|-----------|--------|---------------|---------|
| SG 01 | Mandatory | Public | Core Assessed | General |
|-------|-----------|--------|---------------|---------|

New selection options have been added to this indicator. Please review your prefilled responses carefully.

**SG 01.1** Indicate if you have an investment policy that covers your responsible investment approach.

- Yes
- No

**SG 01.6** Additional information [Optional].

We do not have an overarching investment policy, but rather allow individual teams to set their own. We are creating a firm-wide policy in 2020.

|       |           |        |               |         |
|-------|-----------|--------|---------------|---------|
| SG 03 | Mandatory | Public | Core Assessed | General |
|-------|-----------|--------|---------------|---------|

**SG 03.1** Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.

- Yes

**SG 03.2** Describe your policy on managing potential conflicts of interest in the investment process.

We have a formalized internal code of conduct as well as following standard industry procedures as a FINMA- and CSSF-regulated entity.

- No

## Objectives and strategies

|       |           |        |                       |         |
|-------|-----------|--------|-----------------------|---------|
| SG 05 | Mandatory | Public | Gateway/Core Assessed | General |
|-------|-----------|--------|-----------------------|---------|

**SG 05.1** Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad-hoc basis
- It is not set/reviewed

## Governance and human resources

|         |   |
|---------|---|
| SG 07.1 | Indicate the internal and/or external roles used by your organisation, and indicate for each whether they have oversight and/or implementation responsibilities for responsible investment. |
|---------|---|

|  |       |
|--|-------|
|  | Roles |
|--|-------|

- Board members or trustees
- Internal Roles (triggers other options)

|  |                                      |
|--|--------------------------------------|
|  | Select from the below internal roles |
|--|--------------------------------------|

- Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Other Chief-level staff or head of department, specify
- Portfolio managers
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Investment analysts
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Dedicated responsible investment staff
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Investor relations
- Other role, specify (1)
- Other role, specify (2)
- External managers or service providers
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment

|         |  |
|---------|--|
| SG 07.3 | Indicate the number of dedicated responsible investment staff your organisation has. |
|---------|--|

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

2

## Promoting responsible investment

SG 09

Mandatory

Public

Core Assessed

PRI 4,5

SG 09.1

Select the collaborative organisation and/or initiatives of which your organisation is a member or in which it participated during the reporting year, and the role you played.

### Select all that apply

- Principles for Responsible Investment

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

- Basic  
 Moderate  
 Advanced
- Asian Corporate Governance Association  
 Australian Council of Superannuation Investors  
 AVCA: Sustainability Committee  
 France Invest – La Commission ESG  
 BVCA – Responsible Investment Advisory Board  
 CDP Climate Change  
 CDP Forests  
 CDP Water  
 CFA Institute Centre for Financial Market Integrity  
 Climate Action 100+  
 Code for Responsible Investment in SA (CRISA)  
 Council of Institutional Investors (CII)  
 Eumedion  
 Extractive Industries Transparency Initiative (EITI)  
 ESG Research Australia  
 Invest Europe Responsible Investment Roundtable  
 Global Investors Governance Network (GIGN)  
 Global Impact Investing Network (GIIN)

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

- Basic
- Moderate
- Advanced
- Global Real Estate Sustainability Benchmark (GRESB)
- Green Bond Principles
- HKVCA: ESG Committee
- Institutional Investors Group on Climate Change (IIGCC)
- Interfaith Center on Corporate Responsibility (ICCR)
- International Corporate Governance Network (ICGN)
- Investor Group on Climate Change, Australia/New Zealand (IGCC)
- International Integrated Reporting Council (IIRC)
- Investor Network on Climate Risk (INCR)/CERES
- Local Authority Pension Fund Forum
- Principles for Financial Action in the 21st Century
- Principles for Sustainable Insurance
- Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify
- Responsible Finance Principles in Inclusive Finance
- Shareholder Association for Research and Education (Share)
- United Nations Environmental Program Finance Initiative (UNEP FI)
- United Nations Global Compact
- Other collaborative organisation/initiative, specify  
**Swiss Sustainable Finance**

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

- Basic
- Moderate
- Advanced
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify

|         |   |        |             |       |
|---------|---|--------|-------------|-------|
| SG 09.2 | Mandatory to Report Voluntary to Disclose | Public | Descriptive | PRI 1 |
|---------|---|--------|-------------|-------|

Indicate approximately what percentage (+/- 5%) of your externally managed assets under management are managed by PRI signatories.

%

90



|       |           |        |               |       |
|-------|-----------|--------|---------------|-------|
| SG 10 | Mandatory | Public | Core Assessed | PRI 4 |
|-------|-----------|--------|---------------|-------|

**SG 10.1** Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.

Yes

**SG 10.2** Indicate the actions your organisation has taken to promote responsible investment independently of collaborative initiatives. Provide a description of your role in contributing to the objectives of the selected action and the typical frequency of your participation/contribution.

Provided or supported education or training programmes (this includes peer to peer RI support) Your education or training may be for clients, investment managers, actuaries, broker/dealers, investment consultants, legal advisers etc.)

Description

We provided educational workshops for clients and investment consultants.

Frequency of contribution

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc
- Other

- Provided financial support for academic or industry research on responsible investment
- Provided input and/or collaborated with academia on RI related work
- Encouraged better transparency and disclosure of responsible investment practices across the investment industry
- Spoke publicly at events and conferences to promote responsible investment
- Wrote and published in-house research papers on responsible investment
- Encouraged the adoption of the PRI
- Responded to RI related consultations by non-governmental organisations (OECD, FSB etc.)
- Wrote and published articles on responsible investment in the media
- A member of PRI advisory committees/ working groups, specify
- On the Board of, or officially advising, other RI organisations (e.g. local SIFs)
- Other, specify

No

### Outsourcing to fiduciary managers and investment consultants

|       |           |        |               |       |
|-------|-----------|--------|---------------|-------|
| SG 12 | Mandatory | Public | Core Assessed | PRI 4 |
|-------|-----------|--------|---------------|-------|

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

**SG 12.1**

Indicate whether your organisation uses investment consultants.

- Yes, we use investment consultants

**SG 12.2**

Indicate how your organisation uses investment consultants in the selection, appointment and/or monitoring of external managers.

- We use investment consultants in our selection and appointment of external managers

## Asset class

- Listed Equity (LE)
- Fixed income - Corporate (non-financial)
- Other asset classes
- We use investment consultants in our monitoring of external managers
- We do not use investment consultants for selection, appointment and monitoring of external managers.

**SG 12.3**

Indicate if your organisation considers responsible investment in the selection, appointment and/or review processes for investment consultants.

- Responsible investment is considered when evaluating investment consultants' investment beliefs, strategies and policies in the selection process.
- Responsible investment is considered when evaluating investment consultants' public commitment to, and promotion of, responsible investment in the selection process.
- Responsible investment is considered when reviewing investment consultants' approach to investment manager ratings, research and recommendations in the monitoring process.
- Consultants' responsibilities in terms of responsible investment in manager selection, appointment and monitoring processes are included in our contractual agreements with the investment consultants.
- We do not consider responsible investment in the selection, appointment and/or review processes for investment consultants.

**SG 12.4**

Indicate whether you use investment consultants for any the following services. Describe the responsible investment components of these services.

- Custodial services
- Investment policy development
- Strategic asset allocation
- Investment research
- Other, specify (1)

## Describe how responsible investment is incorporated

- We have a consultant who is reviewing our firm-wide RI policies and further developing our ESG strategy.
- Other, specify (2)
- Other, specify (3)
- None of the above
- No, we do not use investment consultants.

## ESG issues in asset allocation

|       |           |        |             |       |
|-------|-----------|--------|-------------|-------|
| SG 13 | Mandatory | Public | Descriptive | PRI 1 |
|-------|-----------|--------|-------------|-------|

### SG 13.1

Indicate whether the organisation carries out scenario analysis and/or modelling, and if it does, provide a description of the scenario analysis (by asset class, sector, strategic asset allocation, etc.).

- Yes, in order to assess future ESG factors
- Yes, in order to assess future climate-related risks and opportunities
- No, our organisation does not currently carry out scenario analysis and/or modelling

## Asset class implementation not reported in other modules

|       |           |        |             |         |
|-------|-----------|--------|-------------|---------|
| SG 16 | Mandatory | Public | Descriptive | General |
|-------|-----------|--------|-------------|---------|

### SG 16.1

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

| Asset Class    | Describe what processes are in place and the outputs or outcomes achieved  |
|----------------|--|
| Private equity | We have a DDQ which incorporates questions related to ESG factors. We also encourage our direct investments to improve on various ESG criteria, and we are building capacity to formalise this process. In regards to outcomes, we are proud that one of our companies launched a product line focused on environmentally responsible practices. |

|       |           |        |             |         |
|-------|-----------|--------|-------------|---------|
| SG 17 | Mandatory | Public | Descriptive | General |
|-------|-----------|--------|-------------|---------|

### SG 17.1

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

| <b>Asset Class</b>                   | <b>Describe what processes are in place and the outputs or outcomes achieved</b>  |
|--------------------------------------|---|
| Fixed income - SSA                   | We use MSCI ESG research to understand the ESG implications of our external managers' holdings. We use GS Sustain research as a secondary source.   |
| Fixed income - Corporate (financial) | We use MSCI ESG research to understand the ESG implications of our external managers' holdings. We use GS Sustain research as a secondary source.   |
| Fixed income - Securitised           | We use MSCI ESG research to understand the ESG implications of our external managers' holdings. We use GS Sustain research as a secondary source.   |
| Private equity                       | We are in the process of creating a more robust framework to evaluate PE managers' commitment to ESG. This program is on the schedule for 2020.   |
| Property                             | We use MSCI ESG research to understand the ESG implications of our external managers' holdings. We use GS Sustain research as a secondary source.   |
| Commodities                          | We use MSCI ESG research to understand the ESG implications of our external managers' holdings. However, we are exposed to commodities only through financial derivatives which we do not believe have ESG implications as they do not affect the supply or demand of the underlying asset. |
| Inclusive finance                    | We evaluate managers' commitment to ESG, but at the moment have not devoted as much effort to this area as to others, given its impact-oriented nature.   |
| Cash                                 | We do not believe that non-strategic, working cash has any ESG implications. It should be as close to zero as possible subject to liquidity and efficiency constraints.   |

## Communication

|              |                  |               |                      |                 |
|--------------|------------------|---------------|----------------------|-----------------|
| <b>SG 19</b> | <b>Mandatory</b> | <b>Public</b> | <b>Core Assessed</b> | <b>PRI 2, 6</b> |
|--------------|------------------|---------------|----------------------|-----------------|

|                |   |
|----------------|---|
| <b>SG 19.1</b> | Indicate whether your organisation typically discloses asset class specific information proactively. Select the frequency of the disclosure to clients/beneficiaries and the public, and provide a URL to the public information. |
|----------------|---|

|                                       |
|---------------------------------------|
| Selection, Appointment and Monitoring |
|---------------------------------------|

Do you disclose?

- We do not disclose to either clients/beneficiaries or the public.
- We disclose to clients/beneficiaries only.
- We disclose to the public

|  |  |
|--|--|
| <b>Disclosure to clients/beneficiaries</b> |  |
| Disclosure to clients/beneficiaries        | <input checked="" type="checkbox"/> How responsible investment considerations are included in manager selection, appointment and monitoring processes<br><input type="checkbox"/> Details of the responsible investment activities carried out by managers on your behalf<br><input checked="" type="checkbox"/> E, S and/or G impacts and outcomes that have resulted from your managers' investments and/or active ownership<br><input type="checkbox"/> Other |
| Frequency                                  | <input type="checkbox"/> Quarterly or more frequently<br><input checked="" type="checkbox"/> Biannually<br><input type="checkbox"/> Annually<br><input type="checkbox"/> Less frequently than annually<br><input type="checkbox"/> Ad-hoc/when requested   |

Listed equity - Incorporation

Do you disclose?

- We do not proactively disclose it to the public and/or clients/beneficiaries
- We disclose to clients/beneficiaries only.
- We disclose it publicly

|  |   |
|--|---|
| <b>Disclosure to clients/beneficiaries</b> |   |
|  | <p><b>Disclosure to clients/beneficiaries</b></p> <p><input type="radio"/> Broad approach to ESG incorporation</p> <p><input checked="" type="radio"/> Detailed explanation of ESG incorporation strategy used</p>  |
|  | <p><b>Frequency</b></p> <p><input type="checkbox"/> Quarterly or more frequently</p> <p><input checked="" type="checkbox"/> Biannually</p> <p><input type="checkbox"/> Annually</p> <p><input type="checkbox"/> Less frequently than annually</p> <p><input type="checkbox"/> Ad-hoc/when requested</p> |

**Listed equity - Engagement**

**Do you disclose?**

- We do not disclose to either clients/beneficiaries or the public.
- We disclose to clients/beneficiaries only.
- We disclose to the public

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Indirect – Manager Selection, Appointment and Monitoring

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## Listed Equity and Fixed Income Strategies

|        |           |        |         |       |
|--------|-----------|--------|---------|-------|
| SAM 01 | Mandatory | Public | Gateway | PRI 1 |
|--------|-----------|--------|---------|-------|

**SAM 01.1** Indicate which of the following ESG incorporation strategies you require your external manager(s) to implement on your behalf for all your listed equity and/or fixed income assets:

### Active investment strategies

| Active investment strategies | Listed Equity                       |  |  | FI - Corporate (non-financial)      |
|------------------------------|-------------------------------------|--|--|-------------------------------------|
| Screening                    | <input type="checkbox"/>            |  |  | <input type="checkbox"/>            |
| Thematic                     | <input type="checkbox"/>            |  |  | <input type="checkbox"/>            |
| Integration                  | <input type="checkbox"/>            |  |  | <input type="checkbox"/>            |
| None of the above            | <input checked="" type="checkbox"/> |  |  | <input checked="" type="checkbox"/> |

### Passive investment strategies

| Passive investment strategies | Listed Equity                       |  |  | FI -Corporate (non-financial)       |
|-------------------------------|-------------------------------------|--|--|-------------------------------------|
| Screening                     | <input type="checkbox"/>            |  |  | <input type="checkbox"/>            |
| Thematic                      | <input type="checkbox"/>            |  |  | <input type="checkbox"/>            |
| Integration                   | <input type="checkbox"/>            |  |  | <input type="checkbox"/>            |
| None of the above             | <input checked="" type="checkbox"/> |  |  | <input checked="" type="checkbox"/> |

## Selection

|        |           |        |               |       |
|--------|-----------|--------|---------------|-------|
| SAM 02 | Mandatory | Public | Core Assessed | PRI 1 |
|--------|-----------|--------|---------------|-------|

**SAM 02.1** Indicate what RI-related information your organisation typically covers in the majority of selection documentation for your external managers



|   | LE                                  |  | FI - Corporate (non-financial)      |  |  |  |  |
|---|-------------------------------------|--|-------------------------------------|--|--|--|--|
| Your organisation's investment strategy and how ESG objectives relate to it | <input checked="" type="checkbox"/> |  | <input checked="" type="checkbox"/> |  |  |  |  |
| ESG incorporation requirements  | <input checked="" type="checkbox"/> |  | <input checked="" type="checkbox"/> |  |  |  |  |
| ESG reporting requirements  | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  |  |  |  |
| Other   | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  |  |  |  |
| No RI information covered in the selection documentation                    | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  |  |  |  |

**SAM 02.2**

Explain how your organisation evaluates the investment manager's ability to align between your investment strategy and their investment approach

Strategy

|   | LE                                  |  | FI - Corporate (non-financial)      |  |  |  |  |
|---|-------------------------------------|--|-------------------------------------|--|--|--|--|
| Assess the time horizon of the investment manager's offering vs. your/beneficiaries' requirements | <input checked="" type="checkbox"/> |  | <input checked="" type="checkbox"/> |  |  |  |  |
| Assess the quality of investment policy and its reference to ESG                                  | <input checked="" type="checkbox"/> |  | <input checked="" type="checkbox"/> |  |  |  |  |
| Assess the investment approach and how ESG objectives are implemented in the investment process   | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  |  |  |  |
| Review the manager's firm-level vs. product-level approach to RI                                  | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  |  |  |  |
| Assess the ESG definitions to be used   | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  |  |  |  |
| Other   | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  |  |  |  |
| None of the above   | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  |  |  |  |

ESG people/oversight

|  | LE                                  |  | FI - Corporate (non-financial)      |  |  |  |  |
|--|-------------------------------------|--|-------------------------------------|--|--|--|--|
| Assess ESG expertise of investment teams                                   | <input checked="" type="checkbox"/> |  | <input checked="" type="checkbox"/> |  |  |  |  |
| Review the oversight and responsibilities of ESG implementation            | <input checked="" type="checkbox"/> |  | <input checked="" type="checkbox"/> |  |  |  |  |
| Review how is ESG implementation enforced /ensured                         | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  |  |  |  |
| Review the manager's RI-promotion efforts and engagement with the industry | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  |  |  |  |
| Other  | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  |  |  |  |
| None of the above  | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  |  |  |  |

Process/portfolio construction/investment valuation

|   | LE                                  | FI - Corporate (non-financial)      |  |  |  |  |
|---|-------------------------------------|-------------------------------------|--|--|--|--|
| Review the process for ensuring the quality of the ESG data used  | <input type="checkbox"/>            | <input type="checkbox"/>            |  |  |  |  |
| Review and agree the use of ESG data in the investment decision making process                            | <input type="checkbox"/>            | <input type="checkbox"/>            |  |  |  |  |
| Review and agree the impact of ESG analysis on investment decisions                                       | <input type="checkbox"/>            | <input type="checkbox"/>            |  |  |  |  |
| Review and agree ESG objectives (e.g. risk reduction, return seeking, real-world impact)                  | <input type="checkbox"/>            | <input type="checkbox"/>            |  |  |  |  |
| Review and agree manager's ESG risk framework   | <input type="checkbox"/>            | <input type="checkbox"/>            |  |  |  |  |
| Review and agree ESG risk limits at the portfolio level (portfolio construction) and other ESG objectives | <input type="checkbox"/>            | <input type="checkbox"/>            |  |  |  |  |
| Review how ESG materiality is evaluated by the manager  | <input type="checkbox"/>            | <input type="checkbox"/>            |  |  |  |  |
| Review process for defining and communicating on ESG incidents  | <input type="checkbox"/>            | <input type="checkbox"/>            |  |  |  |  |
| Review and agree ESG reporting frequency and detail   | <input type="checkbox"/>            | <input type="checkbox"/>            |  |  |  |  |
| Other, specify  | <input type="checkbox"/>            | <input type="checkbox"/>            |  |  |  |  |
| None of the above   | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |  |  |  |  |

**SAM 02.3** Indicate the selection process and its ESG/RI components

- Review ESG/RI responses to RfP, RfI, DDQ etc.
- Review responses to PRI's Limited Partners' Responsible Investment Due Diligence Questionnaire (LP DDQ)
- Review publicly available information on ESG/RI
- Review assurance process on ESG/RI data and processes
- Review PRI Transparency Reports
- Request and discuss PRI Assessment Reports
- Meetings with the potential shortlisted managers covering ESG/RI themes
- Site visits to potential managers offices
- Other, specify

**SAM 02.4** When selecting external managers does your organisation set any of the following:

|                                     | LE                                  |  | FI - Corporate (non-financial)      |  |  |  |  |
|-------------------------------------|-------------------------------------|--|-------------------------------------|--|--|--|--|
| ESG performance development targets | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  |  |  |  |
| ESG score                           | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  |  |  |  |
| ESG weight                          | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  |  |  |  |
| Real world economy targets          | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  |  |  |  |
| Other RI considerations             | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  |  |  |  |
| None of the above                   | <input checked="" type="checkbox"/> |  | <input checked="" type="checkbox"/> |  |  |  |  |

## Outputs and outcomes

|               |                  |               |                            |                |
|---------------|------------------|---------------|----------------------------|----------------|
| <b>SAM 09</b> | <b>Mandatory</b> | <b>Public</b> | <b>Additional Assessed</b> | <b>PRI 1,6</b> |
|---------------|------------------|---------------|----------------------------|----------------|

### SAM 09.1

Provide examples of how ESG issues have been addressed in the manager selection, appointment and/or monitoring process for your organisation during the reporting year.

Add Example 1

|                   |   |
|-------------------|---|
| Topic or issue    | New Manager Search  |
| Conducted by      | <input checked="" type="checkbox"/> Internal staff<br><input type="checkbox"/> Investment consultants   |
| Asset class       | <input type="checkbox"/> All asset classes<br><input checked="" type="checkbox"/> Listed Equity<br><input type="checkbox"/> Fixed income – corporate (non financial)  |
| Scope and process | After producing a shortlist of managers, a DDQ which included ESG-related questions was sent to managers. We examined their responses and evaluated their commitment to RI at a top level. We then reviewed their holdings using MSCI ESG research.   |
| Outcomes          | We are more confident that the new managers are committed to RI going forward. In concrete terms, one manager replacement included 8 percentage points (pp) more leaders, 6pp fewer laggards and eliminated not rated equities. A second manager included 10pp more leaders and 2pp fewer laggards. |

- Add Example 2
- Add Example 3
- Add Example 4
- Add Example 5
- Add Example 6
- Add Example 7
- We are not able to provide examples

Kieger AG

Reported Information

Public version

Direct - Listed Equity Incorporation

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## ESG incorporation in actively managed listed equities

### Implementation processes

#### (A) Implementation: Screening

|        |           |        |             |       |
|--------|-----------|--------|-------------|-------|
| LEI 04 | Mandatory | Public | Descriptive | PRI 1 |
|--------|-----------|--------|-------------|-------|

##### LEI 04.1

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

##### Type of screening

- Negative/exclusionary screening

##### Screened by

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

##### Description

We use MSCI ESG research as well as other sources to understand if firms are laggards or have problems in these areas.

- Positive/best-in-class screening

##### Screened by

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

|  |             |
|--|-------------|
|  | Description |
|--|-------------|

We use MSCI ESG research as well as other sources to understand if firms are leaders in their sectors.

- Norms-based screening

|                 |  |
|-----------------|--|
| <b>LEI 04.2</b> | Describe how you notify clients and/or beneficiaries when changes are made to your screening criteria. |
|-----------------|--|

We do not have a process for this.

|               |                  |               |                      |              |
|---------------|------------------|---------------|----------------------|--------------|
| <b>LEI 05</b> | <b>Mandatory</b> | <b>Public</b> | <b>Core Assessed</b> | <b>PRI 1</b> |
|---------------|------------------|---------------|----------------------|--------------|

|                 |  |
|-----------------|--|
| <b>LEI 05.1</b> | Indicate which processes your organisation uses to ensure ESG screening is based on robust analysis. |
|-----------------|--|

- Comprehensive ESG research is undertaken or sourced to determine companies' activities and products.
- Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies.
- External research and data used to identify companies to be excluded/included is subject to internal audit by ESG/RI staff, the internal audit function or similar.
- Third-party ESG ratings are updated regularly to ensure that portfolio holdings comply with fund policies.
- Trading platforms blocking / restricting flagged securities on the black list.
- A committee, body or similar with representatives independent of the individuals who conduct company research reviews some or all screening decisions.
- A periodic review of internal research is carried out.
- Review and evaluation of external research providers.
- Other; specify
- None of the above

|                 |   |
|-----------------|---|
| <b>LEI 05.2</b> | Indicate the proportion of your actively managed listed equity portfolio that is subject to comprehensive ESG research as part your ESG screening strategy. |
|-----------------|---|

- <10%
- 10-50%
- 51-90%
- >90%

|                 |   |
|-----------------|---|
| <b>LEI 05.3</b> | Indicate how frequently third party ESG ratings are updated for screening purposes. |
|-----------------|---|

- Quarterly or more frequently
- Bi-Annually
- Annually
- Less frequently than annually



**LEI 05.4** Indicate how frequently you review internal research that builds your ESG screens.

- Quarterly or more frequently
- Bi-Annually
- Annually
- Less frequently than annually

**(C) Implementation: Integration of ESG factors**

|               |                  |               |                      |              |
|---------------|------------------|---------------|----------------------|--------------|
| <b>LEI 08</b> | <b>Mandatory</b> | <b>Public</b> | <b>Core Assessed</b> | <b>PRI 1</b> |
|---------------|------------------|---------------|----------------------|--------------|

**LEI 08.1** Indicate the proportion of actively managed listed equity portfolios where E, S and G factors are systematically researched as part of your investment analysis.

| <b>ESG issues</b>    | <b>Proportion impacted by analysis</b>   |
|----------------------|--|
| Environmental        | <div style="background-color: #0072bc; color: white; padding: 5px; margin-bottom: 10px;"> <span style="background-color: #0072bc; color: white; padding: 2px 10px;"> </span> Environmental         </div> <input type="radio"/> <10%<br><input type="radio"/> 10-50%<br><input checked="" type="radio"/> 51-90%<br><input type="radio"/> >90%        |
| Social               | <div style="background-color: #0072bc; color: white; padding: 5px; margin-bottom: 10px;"> <span style="background-color: #0072bc; color: white; padding: 2px 10px;"> </span> Social         </div> <input type="radio"/> <10%<br><input type="radio"/> 10-50%<br><input type="radio"/> 51-90%<br><input checked="" type="radio"/> >90%               |
| Corporate Governance | <div style="background-color: #0072bc; color: white; padding: 5px; margin-bottom: 10px;"> <span style="background-color: #0072bc; color: white; padding: 2px 10px;"> </span> Corporate Governance         </div> <input type="radio"/> <10%<br><input type="radio"/> 10-50%<br><input type="radio"/> 51-90%<br><input checked="" type="radio"/> >90% |

|               |                  |               |                      |              |
|---------------|------------------|---------------|----------------------|--------------|
| <b>LEI 09</b> | <b>Mandatory</b> | <b>Public</b> | <b>Core Assessed</b> | <b>PRI 1</b> |
|---------------|------------------|---------------|----------------------|--------------|

**LEI 09.1**

Indicate which processes your organisation uses to ensure ESG integration is based on robust analysis.

- Comprehensive ESG research is undertaken or sourced to determine companies' activities and products
- Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- Third-party ESG ratings are updated regularly
- A periodic review of the internal research is carried out
- Structured, regular ESG specific meetings between responsible investment staff and the fund manager or within the investments team
- ESG risk profile of a portfolio against benchmark
- Analysis of the impact of ESG factors on investment risk and return performance
- Other; specify
- None of the above

**LEI 09.2**

Indicate the proportion of your actively managed listed equity portfolio that is subject to comprehensive ESG research as part your integration strategy.

- <10%
- 10-50%
- 51-90%
- >90%

**LEI 09.3**

Indicate how frequently third party ESG ratings that inform your ESG integration strategy are updated.

- Quarterly or more frequently
- Bi-Annually
- Annually
- Less frequently than annually

**LEI 09.4**

Indicate how frequently you review internal research that builds your ESG integration strategy.

- Quarterly or more frequently
- Bi-Annually
- Annually
- Less frequently than annually

**LEI 09.5**

Describe how ESG information is held and used by your portfolio managers.

- ESG information is held within centralised databases or tools, and it is accessible by all relevant staff
- ESG information or analysis is a standard section or aspect of all company research notes or industry/sector analysis generated by investment staff
- Systematic records are kept that capture how ESG information and research were incorporated into investment decisions
- Other; specify
- None of the above

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Reported Information

Public version

Direct - Listed Equity Active Ownership

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## Overview

|        |           |        |               |       |
|--------|-----------|--------|---------------|-------|
| LEA 01 | Mandatory | Public | Core Assessed | PRI 2 |
|--------|-----------|--------|---------------|-------|

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

|          |  |
|----------|--|
| LEA 01.1 | Indicate whether your organisation has an active ownership policy (includes engagement and/or voting). |
|----------|--|

- Yes
- No

|          |  |
|----------|--|
| LEA 01.4 | Do you outsource any of your active ownership activities to service providers? |
|----------|--|

- Yes
- No

|          |                                   |
|----------|-----------------------------------|
| LEA 01.6 | Additional information [optional] |
|----------|-----------------------------------|

In 2019, we engaged on an ad hoc basis. We are in the process of appointing a engagement and voting service provider.

## Engagement

|        |           |        |               |           |
|--------|-----------|--------|---------------|-----------|
| LEA 02 | Mandatory | Public | Core Assessed | PRI 1,2,3 |
|--------|-----------|--------|---------------|-----------|

|          |  |
|----------|--|
| LEA 02.1 | Indicate the method of engagement, giving reasons for the interaction. |
|----------|--|

| Type of engagement                      | Reason for interaction   |
|---|--|
| Individual / Internal staff engagements | <input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues<br><input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure<br><input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management<br><input type="checkbox"/> We do not engage via internal staff |
| Collaborative engagements               | <input type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues<br><input type="checkbox"/> To encourage improved/increased ESG disclosure<br><input type="checkbox"/> To gain an understanding of ESG strategy and/or management<br><input checked="" type="checkbox"/> We do not engage via collaborative engagements            |
| Service provider engagements            | <input type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues<br><input type="checkbox"/> To encourage improved/increased ESG disclosure<br><input type="checkbox"/> To gain an understanding of ESG strategy and/or management<br><input checked="" type="checkbox"/> We do not engage via service providers                    |

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

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

|          |   |
|----------|---|
| LEA 03.1 | Indicate whether your organisation has a formal process for identifying and prioritising engagements. |
|----------|---|

- Yes  
 No

|        |           |        |               |       |
|--------|-----------|--------|---------------|-------|
| LEA 04 | Mandatory | Public | Core Assessed | PRI 2 |
|--------|-----------|--------|---------------|-------|

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

|          |  |
|----------|--|
| LEA 04.1 | Indicate whether you define specific objectives for your organisation's engagement activities. |
|----------|--|

|   |  |
|---|--|
| Individual / Internal staff engagements | <input type="radio"/> All engagement activities<br><input type="radio"/> Majority of engagement activities<br><input type="radio"/> Minority of engagement activities<br><input checked="" type="radio"/> We do not define specific objectives for engagement activities carried out by internal staff |
|---|--|

|        |           |        |               |       |
|--------|-----------|--------|---------------|-------|
| LEA 05 | Mandatory | Public | Core Assessed | PRI 2 |
|--------|-----------|--------|---------------|-------|

**LEA 05.1**

Indicate whether you monitor and/or review engagement outcomes.

|   |  |
|---|--|
| Individual / Internal staff engagements | <input type="radio"/> Yes, in all cases<br><input type="radio"/> Yes, in a majority of cases<br><input type="radio"/> Yes, in a minority of cases<br><input checked="" type="radio"/> We do not monitor, or review engagement outcomes when the engagement is carried out by our internal staff. |
|---|--|

**LEA 06****Mandatory****Public****Additional Assessed****PRI 2,4****LEA 06.1**

Indicate whether your organisation has an escalation strategy when engagements are unsuccessful.

- Yes  
 No

**LEA 08****Mandatory****Public****Gateway****PRI 2****LEA 08.1**

Indicate whether you track the number of your engagement activities.

| Type of engagement                           | Tracking engagements   |
|--|--|
| <b>Individual/Internal staff engagements</b> | <input type="radio"/> Yes, we track the number of our engagements in full<br><input type="radio"/> Yes, we partially track the number of our engagements<br><input checked="" type="radio"/> We do not track |

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## Reported Information

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### Confidence building measures

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## Confidence building measures

|        |           |        |                     |         |
|--------|-----------|--------|---------------------|---------|
| CM1 01 | Mandatory | Public | Additional Assessed | General |
|--------|-----------|--------|---------------------|---------|

**CM1 01.1** Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:

- Third party assurance over selected responses from this year's PRI Transparency Report
- Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year
- Third party assurance or audit of the correct implementation of RI processes (that have been reported to the PRI this year)
- Internal audit of the correct implementation of RI processes and/or accuracy of RI data (that have been reported to the PRI this year)
- Internal verification of responses before submission to the PRI (e.g. by the CEO or the board)
  - Whole PRI Transparency Report has been internally verified
  - Selected data has been internally verified
- Other, specify
- None of the above

|        |           |        |             |         |
|--------|-----------|--------|-------------|---------|
| CM1 02 | Mandatory | Public | Descriptive | General |
|--------|-----------|--------|-------------|---------|

**CM1 02.1** We undertook third party assurance on last year's PRI Transparency Report

- Whole PRI Transparency Report was assured last year
- Selected data was assured in last year's PRI Transparency Report
- We did not assure last year's PRI Transparency report
- None of the above, we were in our preparation year and did not report last year.

|        |           |        |             |         |
|--------|-----------|--------|-------------|---------|
| CM1 03 | Mandatory | Public | Descriptive | General |
|--------|-----------|--------|-------------|---------|

**CM1 03.1** We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:

- We adhere to an RI certification or labelling scheme
- We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report
- ESG audit of holdings
- Other, specify
- None of the above

|        |           |        |             |         |
|--------|-----------|--------|-------------|---------|
| CM1 04 | Mandatory | Public | Descriptive | General |
|--------|-----------|--------|-------------|---------|



**CM1 04.1**

Do you plan to conduct third party assurance of this year's PRI Transparency report?

- Whole PRI Transparency Report will be assured
- Selected data will be assured
- We do not plan to assure this year's PRI Transparency report

**CM1 07**

**Mandatory**

**Public**

**Descriptive**

**General**

**CM1 07.1**

Indicate who has reviewed/verified internally the whole - or selected data of the - PRI Transparency Report . and if this applies to selected data please specify what data was reviewed

**Who has conducted the verification**

- CEO or other Chief-Level staff

**Sign-off or review of responses**

- Sign-off
- Review of responses

**What data has been verified**

- Policies
- Overarching strategy and processes
- Asset class specific processes
- Quantitative data related to RI processes
- Other

**Relevant modules**

- Organisational Overview
- Strategy and Governance
- Indirect – Manager Selection, Appointment and Monitoring
- Direct - Listed Equity Incorporation
- Direct - Listed Equity Active Ownership
- The Board
- Investment Committee
- Compliance Function
- RI/ESG Team

## What data has been verified

- Policies
- Overarching strategy and processes
- Asset class specific processes
- Quantitative data related to RI processes
- Other

## Relevant modules

- Organisational Overview
- Strategy and Governance
- Indirect – Manager Selection, Appointment and Monitoring
- Direct - Listed Equity Incorporation
- Direct - Listed Equity Active Ownership
- Investment Teams
- Legal Department
- Other (specify)