



# RI TRANSPARENCY REPORT

2020

ClearlySo (Delisted)

## About this report

This report is an export of the individual Signatory organisation responses to the PRI Service Provider Reporting Framework during the 2020 reporting period. It shows your responses to mandatory indicators, as well as responses to voluntary indicators that your organisation has agreed to make public. You will be able to access the public RI Transparency report of your organisation and that of other signatories on the [PRI website](#).

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 an **Index** which highlights where the information can be found and summarises the indicators that signatories complete and disclose.

## Understanding the Index

The Index summarises the response status for the individual indicators and modules. It can be used by stakeholders as an 'at a glance' summary of reported information and to identify particular themes or areas of interest.

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.

# Index

Organisational Overview			
Indicator	Short description	Status	Disclosure
OO 01	Basic information	✓	Public
OO 02	Reporting year	✓	Public
OO 03	Signatory category and services	✓	Public
OO 04	Other offerings/business activities	🔒	n/a
OO 05	Breakdown of ESG coverage	✓	Asset mix disclosed in OO 06
OO End		✓	-

Strategy and Governance			
Indicator	Short description	Status	Disclosure
SG 01	Responsible investment policy	✓	Public
SG 02	Norms used to develop policies	✓	Public
SG 03	Policy offerings to clients	✓	Public
SG 04	ESG/RI in business offerings	✓	Public
SG 05	Outsourcing of services	✓	Private
SG 06	Providing training/education	✓	Public
SG 07	Applying, advancing and promoting the PRI principles	✓	Public
SG 08	Actions taken to promote responsible investment	✓	Public
SG 09	Long term trends	✓	Public
SG 10	Interaction with asset owners	✓	Public
SG 11	Aligning approach with investor goals	✓	Public
SG 12	ESG recommendations not aligned with investor goals	✓	Public
SG 13	Seeking feedback from clients	✓	Public
SG 14	Managing conflicts of interest	✓	Public
SG End		✓	-

## Investment Consultancy

Indicator	Short description	Status	Disclosure
IC 01	Advisory and consultancy services	✓	Public
IC 02	Assets under advisement	✓	Private
IC 03	Fiduciary manager services	✓	Public
IC 04	ESG in contracts with clients	✓	Private
IC 05	Custodian services	🔒	n/a
IC 06	RI and ESG in clients' investment policy development	🔒	n/a
IC 07	ESG incorporation into strategic asset allocation	🔒	n/a
IC 08	Scenario analysis and/or modelling	🔒	n/a
IC 09	Demonstrating value on asset allocation	🔒	n/a
IC 10	Investment research activities	🔒	n/a
IC 11	Demonstrating value on investment research	🔒	n/a
IC 12	ESG in manager selection, appointment and monitoring	🔒	n/a
IC 13	Manager selection activities	🔒	n/a
IC 14	Incorporating asset owners' investment principles in selection of manager	🔒	n/a
IC 15	ESG in selection due diligence	🔒	n/a
IC 16	Monitoring investment managers on ESG	🔒	n/a
IC 17	Reporting back to asset owners	🔒	n/a
IC 18	Demonstrating value on manager selection, appointment and monitoring	🔒	n/a
IC 19	ESG in manager selection, appointment and monitoring	🔒	n/a
IC End		✓	-

## Confidence building measures

Indicator	Short description	Status	Disclosure
CM1 01	Other product offerings, processes and/or activities	-	n/a
CM1 02	Assurance of responses	✓	Private
CM1 End	Module confirmation page	✓	-

## ClearlySo (Delisted)

### 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

Descriptive

OO 01.1 Select the location of your organisation's headquarters.

United Kingdom

OO 01.2 Indicate the number of countries in which you have offices (including your headquarters).

- 1
- 2 - 5
- 6 - 10
- 11 - 50
- >50

OO 01.3 Indicate the regions where you have offices.

- Africa/Middle East
- Asia (excluding Japan & Korea)
- Australasia
- Canada
- Continental Europe
- Japan & Korea
- Nordic
- South America
- UK & Ireland
- US

OO 01.4 Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).

FTE

20

## Reporting Year

OO 02

Mandatory

Public

Descriptive

OO 02.1 Indicate the year end date for your reporting year.

31/12/2019

## Signatory category and services

OO 03

Mandatory

Public

Gateway

OO 03.1

Indicate which of the following categories reflect your core offering or main business activity:

- Reporting
- Active Ownership Services
- Investment consultancy
- Research and Data Provision
- Other, specify (1)
- Other, specify(2)

OO 03.2

Indicate any other business activities that your organisation offers. Indicate whether you wish to report on these business areas.

- Reporting
- Active Ownership Services
- Research and Data provision
- Other, specify (3)
- Other, specify (4)
- None of the above

# ClearlySo (Delisted)

## Reported Information

### Public version

### Strategy and Governance

## 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.



## Policy on ESG beliefs

SG 01

Mandatory

Public

Gateway

SG 01.1

Describe how your organisation's philosophy incorporates environmental, social and governance factors, and the link to your business offerings.

ClearlySo's vision is a world where the financial system is a powerful force for good and the impacts of businesses are considered in all investment decisions.

It is our mission to bring impact as the third dimension into investing.

We want all investors to consider the impact of their investment decisions. This will create an environment for entrepreneurs and businesses that make a difference to thrive.

Our values are embodied by our people and in the way we work. We seek to be a different type of organisation that constantly challenges the status quo, finding new and different ways to innovate and grow the market.

ClearlySo offers services both entrepreneurs and investors. Below are the links to our business offerings:

- Raising capital for entrepreneurs and impact investment funds: <https://www.clearlyso.com/raise-capital/>
- Investing capital: <https://www.clearlyso.com/investors/>
- Assessing impact: <https://www.clearlyso.com/atlas/>

SG 01.2

Indicate whether you have policies that formalise the incorporation of your ESG beliefs in your business offerings.

Yes

SG 01.3

Indicate the components/types of your internal policy and provide the URL and/or an attachment of the document/s if they are publicly available.

### Policy components/types

- Policy setting out your overall ESG/RI approach
- Formalised guidelines on environmental factors

### Public availability

- URL
- Attachment
- Not publicly available
- Formalised guidelines on social factors

Public availability

- URL
- Attachment
- Not publicly available
- Formalised guidelines on corporate governance factors
- Formalised guidelines on engagement approach
- Formalised guidelines on (proxy) voting approach
- Other, specify (1)
- Other, specify (2)
- None of the above

SG 01.4

Indicate how these are put into practice internally across the organisation.

- Regular employee training on RI/ESG
- Regular RI/ESG policy awareness building for employees
- Establishment of policy review committee/team
- Remuneration linked to achieving ESG objectives
- Annual performance incentives
- Other, specify (1)

ClearlySo is a certified B Corp, meaning it goes through a rigorous assessment on social and environmental performance

- Other, specify (2)
- Other, specify (3)

No

SG 02

Mandatory

Public

Descriptive

SG 02.1

Indicate what frameworks and guidelines you have used to develop your organisation's policies. Tick all that apply.

- UN Principles for Responsible Investment
- UN Global Compact Principles
- UN Guiding Principles on Business and Human Rights
- Universal Declaration of Human Rights
- UN Sustainable Development Goals
- International Bill of Human Rights
- International Labour Organisation Conventions
- IFC Performance Standards
- United Nations Convention Against Corruption
- OECD Principles of Corporate Governance
- OECD Guidelines for Multinational Enterprises
- GRI standards
- Other, specify (1)

B Lab: B Impact Ratings

- Other, specify (2)
- Other, specify (3)
- None of the above

<b>SG 03</b>	<b>Mandatory</b>	<b>Public</b>	<b>Descriptive</b>
--------------	------------------	---------------	--------------------

**SG 03.1** Indicate whether you offer standard, off the shelf, policies to clients as part of your product offerings, and/or whether you create tailored versions for individual clients.

	<b>Off the shelf</b>	<b>Tailored</b>
Asset class-specific RI guidelines	<input type="checkbox"/>	<input type="checkbox"/>
Sector-specific RI guidelines	<input type="checkbox"/>	<input type="checkbox"/>
Screening/exclusions policy	<input type="checkbox"/>	<input type="checkbox"/>
Engagement policy	<input type="checkbox"/>	<input type="checkbox"/>
(Proxy) voting policy	<input type="checkbox"/>	<input type="checkbox"/>
RI guidelines set out within the Investment Policy Statement (IPS)	<input type="checkbox"/>	<input type="checkbox"/>
RI guidelines set out in a freestanding RI policy	<input type="checkbox"/>	<input type="checkbox"/>
Multi-year RI implementation project plan	<input type="checkbox"/>	<input type="checkbox"/>
Conflict of interest management policy	<input type="checkbox"/>	<input type="checkbox"/>
Stockbroker allocation policy	<input type="checkbox"/>	<input type="checkbox"/>
Securities lending policy	<input type="checkbox"/>	<input type="checkbox"/>
Other, please specify (1)	<input type="checkbox"/>	<input type="checkbox"/>
Other, please specify (2)	<input type="checkbox"/>	<input type="checkbox"/>
Other, please specify (3)	<input type="checkbox"/>	<input type="checkbox"/>
None of the above	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

<b>SG 04</b>	<b>Mandatory</b>	<b>Public</b>	<b>Descriptive</b>
--------------	------------------	---------------	--------------------

**SG 04.1** Briefly describe how you include ESG/RI factors as part of your business offerings.

**Business area**

Investment Consultancy

How you include ESG/RI factors

ClearlySo only works with organisations that create a positive social and/or environmental impact. When working with organisations on an advisory/consultancy basis it will actively incorporate ESG/RI factors in the documentation produced and also in how opportunities are communicated.

**SG 04.2** Indicate the roles in your organisation, and indicate for each whether they have oversight and/or implementation responsibilities for ESG/RI within the organisation.

Roles present in your organisation	Oversight/accountability for ESG/RI	Implementation of ESG/RI
Board	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Directors	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chief Executive Officer (CEO), Chief Financial Officer (CFO)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chief Operating Officer (COO), Chief Information Officer (CIO)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other chief-level staff	<input checked="" type="checkbox"/> <div style="background-color: #0070C0; color: white; padding: 2px; display: inline-block;">Please specify</div> CMO Head of Enterprises	<input type="checkbox"/>
Other heads of department	<input type="checkbox"/>	<input type="checkbox"/>
Dedicated ESG/RI staff	<input type="checkbox"/>	<input type="checkbox"/>
Other role, specify (1)	<input type="checkbox"/>	<input type="checkbox"/>
Other role, specify (2)	<input type="checkbox"/>	<input type="checkbox"/>
Other role, specify (3)	<input type="checkbox"/>	<input type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>

**SG 04.3**

Indicate how you ensure ESG/RI expertise for the roles where there are RI oversight/accountability or implementation responsibilities.

- Staff training on ESG/RI incorporation
- Including ESG/RI knowledge factors in personal development goals
- Having development plans that aim to enhance ESG/RI knowledge of certain departments/teams/individuals
- Including ESG in selection requirements when hiring new employees
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)
- Other, specify (4)

**SG 04.4**

Indicate whether your organisation has any ESG/RI linked incentives for its employees.

- Yes
- No
- Not applicable, we ensure that employees incorporate ESG/RI into services through other mechanisms.

**SG 04.6**

Describe how you ensure that your employees incorporate ESG/RI into services through other mechanisms than ESG/RI linked incentives.

ClearlySo only works with organisations that create a positive social and/or environmental impact.

**SG 06****Mandatory****Public****Descriptive****SG 06.1**

Indicate whether you provide training/educational services on ESG/RI. Tick all that apply.

- Board/trustee training
- Investment manager training
- Regulatory bodies/authorities or public policy makers
- Corporate executive training
- ESG analyst training
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)
- Other, specify (4)
- None of the above

**SG 07****Mandatory****Public****Descriptive**

**SG 07.1**

Describe how your organisation applies, advances and promotes the PRI Principles.

Through its capital raising and impact assessment services ClearlySo actively encourages entrepreneurs and investors to consider impact in how they operate and in their investment decision making. In doing this, the business will refer to the PRI Principles.

The business also refers to its UN PRI signatory status in marketing materials and website.

**SG 08****Mandatory****Public****SG 08.1**

Indicate which of the following actions your organisation has taken to promote responsible investments during the reporting year, independently of collaborative initiatives.

- Provided or supported education or training programmes for clients, investment managers, legal advisers or other investment organisations
- Provided financial support for academic or industry research on responsible investment
- Encouraged better transparency and disclosure of responsible investment practices across the investment industry
- Spoken publicly at events and conferences to promote responsible investment
- Written and published in-house research papers on responsible investment
- Encouraged the adoption of the PRI
- Written and published articles on responsible investment in the media
- Policy engagements and other interactions
- Other, specify
- None of the above

**SG 09****Mandatory****Public****Descriptive****SG 09.1**

Indicate which of the following long-term trends are addressed in your product outputs.

- Changing demographics

**SG 09.2**

Explain how this long-term trend affects your product outputs.

Some of ClearlySo's clients are focused on addressing issues arising from changing demographics (e.g. innovation in elderly care).

- Climate change

**SG 09.2**

Explain how this long-term trend affects your product outputs.

Some of ClearlySo's clients are focused on issues arising from climate change (e.g. renewable energy, reduced energy consumption)

- Resource scarcity

**SG 09.2**

Explain how this long-term trend affects your product outputs.

Some of ClearlySo's clients have developed innovative business models using the circular economy at its core.

Technology developments

**SG 09.2**

Explain how this long-term trend affects your product outputs.

Some of ClearlySo's clients are actively developing new technologies to address the key social and environmental issues faced by society.

Other, specify (1)

Other, specify (2)

None of the above

**SG 10**

**Mandatory**

**Public**

**SG 10.1**

Indicate whether you interact with asset owner clients.

Yes, we do

**SG 10.2**

Indicate the typical frequency and type of interactions with your asset owner clients.

**Type of interaction**

- Board of trustee meetings
- Investment committee meetings
- Trustee training workshops
- Formal regular meetings outside of committee meetings
- Informal meetings or calls

**Frequency**

- Daily
- Weekly
- Monthly
- Quarterly
- Bi-annually
- Annually
- Ad-hoc basis
- Other, specify
- Other, specify (1)  
Meetings with investment management teams

Frequency
-----------

- Daily
- Weekly
- Monthly
- Quarterly
- Bi-annually
- Annually
- Ad-hoc basis
- Other, specify

When there are live projects to work on with the asset owner

- Other, specify (2)

Meetings with ESG/RI teams

Frequency
-----------

- Daily
- Weekly
- Monthly
- Quarterly
- Bi-annually
- Annually
- Ad-hoc basis
- Other, specify

When there are live projects to work on with the asset owner

- Other, specify (3)

- No, we do not

SG 11	Mandatory	Public	Descriptive
-------	-----------	--------	-------------

SG 11.1	Describe how you typically align your organisation's philosophy and approach to ESG/RI with your investor clients' goals.
---------	---

- Describe

ClearlySo's core belief is that impact is the third dimension in investment decisions (in addition to risk and return). The firm advocates that all investment decisions should be made considering impact.

- This is not relevant for my organisation

SG 12	Mandatory	Public	Descriptive
-------	-----------	--------	-------------

SG 12.1	Describe what steps you take, if any, when your ESG recommendations are not in line with your investor clients' goals.
---------	--

- Describe

- This is not relevant for my organisation



SG 13	Mandatory	Public	Descriptive
-------	-----------	--------	-------------

SG 13.1	Indicate whether you seek feedback from clients on your RI/ESG services and product offerings
---------	---

Yes

SG 13.2	Describe how you use this feedback in your RI/ESG services and product offerings.
---------	---

We are always looking to improve and use the feedback from clients to enhance our services and product offerings.

No

SG 14	Mandatory	Public	Descriptive
-------	-----------	--------	-------------

SG 14.1	Indicate whether your organisation has a policy for managing potential conflicts of interest.
---------	---

Yes

SG 14.2	Describe how you manage potential conflicts of interest.
---------	--

Potential conflicts of interest are flagged to the firm's compliance officer, the CEO and relevant managers. Together, they determine whether there is a conflict and take any actions required to manage the conflict.

The firm has a set of policies and procedures put in place and we anticipate that we will identify most potential conflicts before they arise and deal with them in the following ways.

- We have a conflicts committee, that meets regularly to discuss new and existing business and to try and identify potential conflicts of interest before they become an issue.
- We maintain a conflicts register that logs all conflicts identified and details the action taken by the firm to resolve the conflict
- If the conflict relates to a member of staff or their connected person and the client we can exclude the member of staff from dealing with that client.
- If the conflict is between one of our clients and another we may decide that we cannot act for one of the clients or indeed both if the situation warranted it.. We would of course disclose this to them.
- If the conflict arises between the firm and a client we will ensure the client has preferential treatment.
- In most case we would hope to identify conflicts of interest before they become a conflict, however should we become aware of a conflict of interest after it has become a conflict we would of course disclose this to our client /s and ensure that they were not disadvantaged because of it.
- Where we have identified a conflict of interest and cannot find a way to resolve it using the methods described above, as a last resort we would, disclose it to the client prior to undertaking investment business for them or, if we do not believe that disclosure is appropriate to manage the conflict, we may opt not to proceed with the transaction or matter giving rise to the conflict.

**SG 14.3**

Describe how you ensure that company employees do not derive any personal gain from the use of information collected during your work process.

ClearlySo has a detailed "Personal Account Dealing" policy that sets out restrictions which apply to dealing in financial instruments and other transactions entered into by officers and employees and consultants of the Company. This policy seeks to ensure that company employees do not derive any personal gain from the use of information collected during our work process.

Application of policy:

- This policy applies to any dealing in financial instruments of the Company's or its group company's current, former and potential clients by or on behalf of the Company's employees, relatives, officers and consultants (where such consultants are engaged in relation to client matters or have access to confidential client information) to whom the Company's compliance procedures apply. "Potential clients" in the preceding sentence includes only persons who the Company's employee, officer or consultant is aware have a reasonable prospect of becoming a client of the Company or group companies of the Company (but if not so aware, the employee, consultant or officer might still be subject to this policy under 1.b below).
- This policy also applies to other transactions entered by or on behalf of such persons where such transactions relate to matters on which such persons have non-public, confidential information obtained by virtue of their position with the Company which materially influences their decision to enter into, terminate, vary or execute an arrangement (or to refrain from doing any of the same).
- Such restrictions also apply to connected persons of such persons, being: husbands, wives, civil partners, co-habitees, parents or step parents, children or step children, partners or others with whom the person is in business with.

Prior to entering into any relevant transaction, a company employee shall notify the company's Compliance Officer as soon as practicable and shall - wherever practicable - meet with the Compliance Officer in person or by telephone to discuss the matter. The company employee shall refrain from entering into the relevant transaction until the Compliance Officer has approved such relevant transaction.

No

ClearlySo (Delisted)

Reported Information

Public version

Investment Consultancy

## 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.

## Investment Consultancy

IC 01

Mandatory

Public

Gateway

IC 01.1

Indicate whether your services include any of the following.

- Custodial services
- Investment policy development
- Strategic asset allocation
- Investment research
- Manager selection and monitoring
- Other, specify (1)  
Capital raising and advisory services to businesses and impact investment funds
- Other, specify (2)

IC 01.2

Describe how you ensure that your clients understand your service offerings and fee structure.

Clients are presented with an extensive overview of our service offerings and fee structures prior to any engagement. A confirmation of this understanding is made when the client signs an engagement letter.

IC 03

Mandatory

Public

IC 03.1

Indicate whether you provide fiduciary management services.

- Yes, we do
- No, we do not

## ClearlySo (Delisted)

### Reported Information

### Public version

### Confidence building measures

## 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.

