



| LEA 02                                 | Disclosures: Mandatory   | Reason for Interaction   | Principle: PRI 1, 2, 3 |
|--|--|--|------------------------|
| Individual/ internal staff engagements | <p><input checked="" type="checkbox"/> To support investment decision-making in a company's business</p> <p><input checked="" type="checkbox"/> To influence corporate transition or identify the need for a transition</p> <p><input checked="" type="checkbox"/> To engage internal ESG advisors</p> <p><input checked="" type="checkbox"/> To engage internal ESG advisors</p> <p><input type="checkbox"/> Other: specify</p> <p><input type="checkbox"/> We do not engage internal staff</p> | <p><input checked="" type="checkbox"/> To support investment decision-making in a company's business</p> <p><input checked="" type="checkbox"/> To influence corporate transition or identify the need for a transition</p> <p><input checked="" type="checkbox"/> To engage internal ESG advisors</p> <p><input checked="" type="checkbox"/> To engage internal ESG advisors</p> <p><input type="checkbox"/> Other: specify</p> <p><input type="checkbox"/> We do not engage internal staff</p> |                        |
| Collaborative engagements              | <p><input checked="" type="checkbox"/> To support investment decision-making in a company's business</p> <p><input checked="" type="checkbox"/> To influence corporate transition or identify the need for a transition</p> <p><input checked="" type="checkbox"/> To engage internal ESG advisors</p> <p><input checked="" type="checkbox"/> To engage internal ESG advisors</p> <p><input type="checkbox"/> Other: specify</p> <p><input type="checkbox"/> We do not engage internal staff</p> | <p><input checked="" type="checkbox"/> To support investment decision-making in a company's business</p> <p><input checked="" type="checkbox"/> To influence corporate transition or identify the need for a transition</p> <p><input checked="" type="checkbox"/> To engage internal ESG advisors</p> <p><input checked="" type="checkbox"/> To engage internal ESG advisors</p> <p><input type="checkbox"/> Other: specify</p> <p><input type="checkbox"/> We do not engage internal staff</p> |                        |
| Service provider engagements           | <p><input checked="" type="checkbox"/> To support investment decision-making in a company's business</p> <p><input checked="" type="checkbox"/> To influence corporate transition or identify the need for a transition</p> <p><input checked="" type="checkbox"/> To engage internal ESG advisors</p> <p><input checked="" type="checkbox"/> To engage internal ESG advisors</p> <p><input type="checkbox"/> Other: specify</p> <p><input type="checkbox"/> We do not engage internal staff</p> | <p><input checked="" type="checkbox"/> To support investment decision-making in a company's business</p> <p><input checked="" type="checkbox"/> To influence corporate transition or identify the need for a transition</p> <p><input checked="" type="checkbox"/> To engage internal ESG advisors</p> <p><input checked="" type="checkbox"/> To engage internal ESG advisors</p> <p><input type="checkbox"/> Other: specify</p> <p><input type="checkbox"/> We do not engage internal staff</p> |                        |

# RI TRANSPARENCY REPORT

## 2020

Blue Oceans Capital

## 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   | 🔒      | n/a                          |           |   |   |   |   |   | ✓       |
| OO 08                   | Segregated mandates or pooled funds  | 🔒      | n/a                          |           |   |   |   |   |   | ✓       |
| 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 | 🔒      | n/a                          |           |   |   |   |   |   | ✓       |
| OO PE 01                | Breakdown of private equity investments by strategy                          | 🔒      | n/a                          |           |   |   |   |   |   | ✓       |
| OO PE 02                | Typical level of ownership in private equity investments                     | 🔒      | n/a                          |           |   |   |   |   |   | ✓       |
| 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                 | ✓      | Public     |           |   |   |   |   | ✓ |         |
| 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   | ✓      | Public     |           |   |   |   |   |   | ✓       |
| SG 09                     | Collaborative organisations / initiatives                          | ✓      | Public     |           |   |   | ✓ | ✓ |   |         |
| SG 09.2                   | Assets managed by PRI signatories                                  | 🔒      | n/a        | ✓         |   |   |   |   |   |         |
| 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 | 🔒      | n/a        |           |   |   |   |   |   | ✓       |
| SG 17                     | ESG issues for externally managed assets not reported in framework | 🔒      | n/a        |           |   |   |   |   |   | ✓       |
| SG 18                     | Innovative features of approach to RI                              | ✓      | Private    |           |   |   |   |   |   | ✓       |
| SG 19                     | Communication  | ✓      | Public     |           | ✓ |   |   |   | ✓ |         |
| SG 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                                    | ✓      | Public     | ✓         |   |   |   |   |   |         |
| LEI 02                               | Type of ESG information used in investment decision                          | -      | n/a        | ✓         |   |   |   |   |   |         |
| 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                              | ✓      | Public     | ✓         |   |   |   |   |   |         |
| 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      | ✓      | Private    | ✓         |   |   |   |   |   |         |
| 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         | ✓      | Private    |           | ✓ |   |   |   |   |         |
| LEA 10                                  | Engagement methods   | ✓      | Private    |           | ✓ |   |   |   |   |         |
| LEA 11                                  | Examples of ESG engagements  | ✓      | Private    |           | ✓ |   |   |   |   |         |
| LEA 12                                  | Typical approach to (proxy) voting decisions                                 | ✓      | Public     |           | ✓ |   |   |   |   |         |
| LEA 13                                  | Percentage of voting recommendations reviewed                                | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA 14                                  | Securities lending programme   | ✓      | Private    |           | ✓ |   |   |   |   |         |
| LEA 15                                  | Informing companies of the rationale of abstaining/voting against management | ✓      | Public     |           | ✓ |   |   |   |   |         |
| LEA 16                                  | Informing companies of the rationale of abstaining/voting against management | ✓      | Public     |           | ✓ |   |   |   |   |         |
| LEA 17                                  | Percentage of (proxy) votes cast   | ✓      | Public     |           | ✓ |   |   |   |   |         |
| LEA 18                                  | Proportion of ballot items that were for/against/abstentions                 | ✓      | Private    |           | ✓ |   |   |   |   |         |
| LEA 19                                  | Proportion of ballot items that were for/against/abstentions                 | ✓      | Public     |           | ✓ |   |   |   |   |         |
| LEA 20                                  | Shareholder resolutions  | ✓      | Private    |           | ✓ |   |   |   |   |         |
| 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              | 🔒      | n/a        |           |   |   |   |   |   | ✓       |
| CM1 01 End                   | Module confirmation page           | ✓      | -          |           |   |   |   |   |   |         |

# Blue Oceans Capital

## Reported Information

### Public version

### Organisational Overview

## PRI disclaimer

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## 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 type="radio"/> 10-50%<br><input checked="" type="radio"/> >50% |
| Fund of funds, manager of managers, sub-advised products | <input checked="" type="radio"/> 0%<br><input type="radio"/> <10%<br><input type="radio"/> 10-50%<br><input 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.

Australia

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

3

**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.

31/06/2020

**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     |           |          | 3        | 200       | 000      |
| Currency      | AUD       |          |          |           |          |
| Assets in USD |           |          | 2        | 167       | 679      |

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

**OO 06** **Mandatory** **Public** **Descriptive** **General**

**OO 06.1** Select how you would like to disclose your asset class mix.

as percentage breakdown

|               | Internally managed (%) | Externally managed (%) |
|---------------|------------------------|------------------------|
| Listed equity | 100                    | 0                      |

|                          |   |   |
|--------------------------|---|---|
| Fixed income             | 0 | 0 |
| Private equity           | 0 | 0 |
| Property                 | 0 | 0 |
| Infrastructure           | 0 | 0 |
| Commodities              | 0 | 0 |
| Hedge funds              | 0 | 0 |
| Fund of hedge funds      | 0 | 0 |
| Forestry                 | 0 | 0 |
| Farmland                 | 0 | 0 |
| Inclusive finance        | 0 | 0 |
| Cash                     | 0 | 0 |
| Money market instruments | 0 | 0 |
| Other (1), specify       | 0 | 0 |
| Other (2), specify       | 0 | 0 |

as broad ranges

**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**

|                |  |
|----------------|--|
| <b>OO 09.1</b> | Indicate the breakdown of your organisation's AUM by market. |
|                | Developed Markets  |
| 90             |  |
|                | Emerging Markets   |
| 0              |  |
|                | Frontier Markets   |
| 0              |  |
|                | Other Markets  |
| 10             |  |
|                | Total 100%   |
| 100%           |  |

**Asset class implementation gateway indicators**

|              |                  |               |                |                |
|--------------|------------------|---------------|----------------|----------------|
| <b>OO 10</b> | <b>Mandatory</b> | <b>Public</b> | <b>Gateway</b> | <b>General</b> |
|--------------|------------------|---------------|----------------|----------------|

**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 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 do not cast our (proxy) votes directly and do not require external managers to vote on our behalf

|              |                  |               |                |                |
|--------------|------------------|---------------|----------------|----------------|
| <b>OO 11</b> | <b>Mandatory</b> | <b>Public</b> | <b>Gateway</b> | <b>General</b> |
|--------------|------------------|---------------|----------------|----------------|

**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.

|       |           |        |         |         |
|-------|-----------|--------|---------|---------|
| OO 12 | Mandatory | Public | Gateway | General |
|-------|-----------|--------|---------|---------|

**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
- (Proxy) voting

Closing module

- Closing module

# Blue Oceans Capital

## Reported Information

### Public version

### 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

**SG 01.2**

Indicate the components/types and coverage of your policy.

Select all that apply

| Policy components/types  | Coverage by AUM  |
|--|--|
| <input checked="" type="checkbox"/> Policy setting out your overall approach<br><input checked="" type="checkbox"/> Formalised guidelines on environmental factors<br><input checked="" type="checkbox"/> Formalised guidelines on social factors<br><input checked="" type="checkbox"/> Formalised guidelines on corporate governance factors<br><input type="checkbox"/> Fiduciary (or equivalent) duties<br><input type="checkbox"/> Asset class-specific RI guidelines<br><input type="checkbox"/> Sector specific RI guidelines<br><input checked="" type="checkbox"/> Screening / exclusions policy<br><input type="checkbox"/> Engagement policy<br><input type="checkbox"/> (Proxy) voting policy<br><input type="checkbox"/> Other, specify (1)<br><input type="checkbox"/> Other, specify(2) | <input checked="" type="radio"/> Applicable policies cover all AUM<br><input type="radio"/> Applicable policies cover a majority of AUM<br><input type="radio"/> Applicable policies cover a minority of AUM |

**SG 01.3**

Indicate if the investment policy covers any of the following

- Your organisation's definition of ESG and/or responsible investment and it's relation to investments
- Your investment objectives that take ESG factors/real economy influence into account
- Time horizon of your investment
- Governance structure of organisational ESG responsibilities
- ESG incorporation approaches
- Active ownership approaches
- Reporting
- Climate change
- Understanding and incorporating client / beneficiary sustainability preferences
- Other RI considerations, specify (1)
- Other RI considerations, specify (2)

**SG 01.4**

Describe your organisation's investment principles and overall investment strategy, interpretation of fiduciary (or equivalent) duties, and how they consider ESG factors and real economy impact.

**Investment Principles and Strategy**

Fundamental, active, long-term investments in profitable companies whose business model is disrupting or creating an industry for the benefit of environment and people. The majority of our analysis is focused on the drivers of price and volume.

- Concentrated portfolio
- Screen all investment opportunities manually, looking at the business model as a first filter
- Detailed analysis of financials, notes to financials, industry, and competitors. (Company must have earnings from operations or we must be able to clearly establish a likely pathway to profitability)
- Calculate intrinsic value based on tangible value in the business (value of advertising, R&D, balance sheet) and value of distributable earnings (cash flow from operations) (We can only purchase a company where the stock price represents a fair or discounted value as compared to our valuation).
- Detailed ESG analysis (Company must align with good ESG management practice).
- Accounting manipulation checks (check on any evidence of accounting manipulation or embellishment).

**Fiduciary**

Our investors perceive us as sustainable. It is therefore our duty to interpret what sustainability means and to enact it in our daily activities.

**SG 01.5**

Provide a brief description of the key elements, any variations or exceptions to your investment policy that covers your responsible investment approach. [Optional]

We only make investments that do not involve polluting commodities, weapons or defence, gambling, alcohol, or any media harmful to psychological well-being. We conduct ESG analysis and report on ESG factors for each of our investments as per the guide and case studies in "A practical guide to ESG integration for equity investing." We only invest in companies with good ESG alignment and have divested where there has been misalignment during the course of our holding.

○ No

**SG 02****Mandatory****Public****Core Assessed****PRI 6**



**SG 02.1**

Indicate which of your investment policy documents (if any) are publicly available. Provide a URL and an attachment of the document.

- Policy setting out your overall approach

URL/Attachment

- URL

URL

<https://blueoceans.com.au/methodology/>

- Attachment (will be made public)

- Formalised guidelines on environmental factors

URL/Attachment

- URL

URL

[https://blueoceans.com.au/wp-content/uploads/2019/06/03606-blueo-priguideelines\\_a4-web-20190613.pdf](https://blueoceans.com.au/wp-content/uploads/2019/06/03606-blueo-priguideelines_a4-web-20190613.pdf)

- Attachment (will be made public)

- Formalised guidelines on social factors

URL/Attachment

- URL

URL

[https://blueoceans.com.au/wp-content/uploads/2019/06/03606-blueo-priguideelines\\_a4-web-20190613.pdf](https://blueoceans.com.au/wp-content/uploads/2019/06/03606-blueo-priguideelines_a4-web-20190613.pdf)

- Attachment (will be made public)

- Formalised guidelines on corporate governance factors

URL/Attachment

- URL

URL

[https://blueoceans.com.au/wp-content/uploads/2019/06/03606-blueo-priguideelines\\_a4-web-20190613.pdf](https://blueoceans.com.au/wp-content/uploads/2019/06/03606-blueo-priguideelines_a4-web-20190613.pdf)

Attachment (will be made public)

Screening / exclusions policy

URL/Attachment

URL

URL

<https://blueoceans.com.au/methodology/>

Attachment (will be made public)

We do not publicly disclose our investment policy documents

**SG 02.2** Indicate if any of your investment policy components are publicly available. Provide URL and an attachment of the document.

Your organisation's definition of ESG and/or responsible investment and it's relation to investments

URL/Attachment

URL

URL

[https://blueoceans.com.au/wp-content/uploads/2019/06/03606-blueo-priguideelines\\_a4-web-20190613.pdf](https://blueoceans.com.au/wp-content/uploads/2019/06/03606-blueo-priguideelines_a4-web-20190613.pdf)

Attachment

Your investment objectives that take ESG factors/real economy influence into account

We do not publicly disclose any investment policy components

|              |                  |               |                      |                |
|--------------|------------------|---------------|----------------------|----------------|
| <b>SG 03</b> | <b>Mandatory</b> | <b>Public</b> | <b>Core Assessed</b> | <b>General</b> |
|--------------|------------------|---------------|----------------------|----------------|

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

Yes

No

## Objectives and strategies

|              |                  |               |                              |                |
|--------------|------------------|---------------|------------------------------|----------------|
| <b>SG 05</b> | <b>Mandatory</b> | <b>Public</b> | <b>Gateway/Core Assessed</b> | <b>General</b> |
|--------------|------------------|---------------|------------------------------|----------------|

**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

**SG 05.2**

Additional information. [Optional]

Annually and as we find areas for improvement.

## Governance and human resources

**SG 07****Mandatory****Public****Core Assessed****General****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
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- 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
- Investor relations
- Other role, specify (1)
- Other role, specify (2)
- External managers or service providers

**SG 07.2**

For the roles for which you have RI oversight/accountability or implementation responsibilities, indicate how you execute these responsibilities.

- By checking analysis completed on each ESG report and all analysis completed for each investment
- By conducting my own ESG analysis separate to the analysts
- By continually monitoring companies in our portfolio
- By researching potential ESG issues of companies in our portfolio

**SG 07.3**

Indicate the number of dedicated responsible investment staff your organisation has.

Number

3

**SG 08**

Voluntary

Public

Additional Assessed

General

**SG 08.1**

Indicate if your organisation's performance management, reward and/or personal development processes have a responsible investment element.

Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee

**SG 08.1a** RI in objectives, appraisal and/or reward

- Responsible investment KPIs and/or goals included in objectives
- Responsible investment included in appraisal process
- Variable pay linked to responsible investment performance
- None of the above

**SG 08.1b** RI in personal development and/or training plan

- Responsible investment included in personal development and/or training plan
- None of the above

**Portfolio managers**

**SG 08.1a** RI in objectives, appraisal and/or reward

- Responsible investment KPIs and/or goals included in objectives
- Responsible investment included in appraisal process
- Variable pay linked to responsible investment performance
- None of the above

**SG 08.1b** RI in personal development and/or training plan

- Responsible investment included in personal development and/or training plan
- None of the above

**Investment analysts**

**SG 08.1a** RI in objectives, appraisal and/or reward

- Responsible investment KPIs and/or goals included in objectives
- Responsible investment included in appraisal process
- Variable pay linked to responsible investment performance
- None of the above

**SG 08.1b** RI in personal development and/or training plan

- Responsible investment included in personal development and/or training plan
- None of the above

**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

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

We are a member and publically disclose on our website that we are and we report.

- 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)
- 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)

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

- Basic
- Moderate
- Advanced

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

Contributed to alliance against Amazon forest fires

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

|       |           |        |               |       |
|-------|-----------|--------|---------------|-------|
| 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.)
- 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

Description

Investor conferences in Singapore and London



### Frequency of contribution

- Quarterly or more frequently
  - Biannually
  - Annually
  - Less frequently than annually
  - Ad hoc
  - Other
- Wrote and published in-house research papers on responsible investment

### Description

Research papers on ESG factors involved with investments we have made and published on our website.

### Frequency of contribution

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

## Communication

|       |           |        |               |          |
|-------|-----------|--------|---------------|----------|
| SG 19 | Mandatory | Public | Core Assessed | PRI 2, 6 |
|-------|-----------|--------|---------------|----------|

**SG 19.1** 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.

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

The information disclosed to clients/beneficiaries is the same

- Yes
- No

|                                     |  |
|-------------------------------------|--|
| <b>Disclosure to public and URL</b> |  |
| Disclosure to public and URL        | <input type="radio"/> Broad approach to ESG incorporation<br><input checked="" type="radio"/> Detailed explanation of ESG incorporation strategy used  |
| Frequency                           | <input type="checkbox"/> Quarterly or more frequently<br><input type="checkbox"/> Biannually<br><input type="checkbox"/> Annually<br><input type="checkbox"/> Less frequently than annually<br><input checked="" type="checkbox"/> Ad-hoc/when requested |
| URL                                 | <a href="https://blueoceans.com.au/sustainability/">https://blueoceans.com.au/sustainability/</a>  |

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

Listed equity – (Proxy) Voting

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

Blue Oceans Capital

Reported Information

Public version

Direct - Listed Equity Incorporation

## PRI disclaimer

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## ESG incorporation in actively managed listed equities

### Implementation processes


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

LEI 01.1

Indicate which ESG incorporation strategy and/or combination of strategies you apply to your actively managed listed equities; and the breakdown of your actively managed listed equities by strategy or combination of strategies.

#### ESG incorporation strategy (select all that apply)

- Screening alone (i.e., not combined with any other strategies)
- Thematic alone (i.e., not combined with any other strategies)
- Integration alone (i.e., not combined with any other strategies)
- Screening and integration strategies
- Thematic and integration strategies
- Screening and thematic strategies
- All three strategies combined

|   |   |
|---|---|
| Percentage of active listed equity to which the strategy is applied — you may estimate +/- 5% | <br>100 |
|---|---|

- We do not apply incorporation strategies

Total actively managed listed equities

100%

LEI 01.2

Describe your organisation's approach to ESG incorporation and the reasons for choosing the particular strategy/strategies.

Initial screening involves filtering out any company that is involved in:

- Polluting commodities (such as oil, coal, copper or gold)
- Weapons or defence
- Gambling
- Alcohol
- Any media harmful to psychological well-being

If a company passes this filter we then examine:

- External ESG factors
- How the company has demonstrated its awareness of ESG factors
- Where management has demonstrated its awareness of ESG factors
- How management has demonstrated its knowledge of ESG risks
- Strategy alignment with ESG opportunities

- Evidence of reporting highlighting future ESG risks and if strategy allows for anticipated risks
- Linking of ESG factors to financial performance
- Extent that management involves customers, employees, government and other stakeholders in ESG issues
- How responsive the company is to investor engagement
- Board support of ESG issues
- Drivers of revenue for price and volume and do they align with sustainable ESG factors, future prospects for these factors
- Risks in future ESG factors
- ESG trends and their impact on core markets
- Anticipated legislative or regulatory changes
- Sustainability of company's key markets in terms of resource use and disposal, consumer preferences and social trends
- Scarcity of raw materials
- Energy intensity of operations
- Motivation of employees
- Risks that input costs will rise and is the company aware of this
- Costs projects of input costs
- Gross income as a portion of revenue
- Product development strategy and % of new sales from new products
- Pending patent applications
- Incentive structures
- Extent of stakeholder research
- Efforts to mitigate ESG risks in regards to costs
- Capacity to sustain or improve operating efficiency
- Growth rate of shares outstanding
- Percentage of total assets that are intangible assets
- Environmental provisions and levels vs historical costs
- Notes to balance sheet recognising environmental risks to physical assets
- Notes to balance sheet in recognition to ESG risks to reputation
- Strength of brand
- Strength of customer satisfaction and loyalty
- Pricing power
- Level of autonomy of employees
- if there are flat or hierarchical structures
- Recruitment procedure for obtaining talented graduates
- Structure and diversity of non-executive board
- How dynamic and committed executive management is
- If pension assets are being managed by ESG aware practitioners
- If liabilities are short or long-term
- The efficiency of working capital
- Reliability of relationships with suppliers and customers
- Extent of off-balance sheet commitments
- If there is excessive leverage eroding stakeholder trust and raising cost of equity
- If debt covenants specify any aspects of ESG risk management
- If operating expenses are being reduced by investment in resource-efficient technology

- If capital expenditure is covering asset depreciation
- Capital expenditure and if it is reducing the need for capex in the future pointing to improvements in free cash flows
- Any due diligence on acquisition targets needs to cover long-term ESG risks
- Debt facilities in relation to costs that could be lowered if management improves its ESG risks
- Any amendment that needs to be made to our valuation in light of ESG risks impacting future cash flows

## (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
- Positive/best-in-class screening
- Norms-based screening

### Screened by

- UN Global Compact Principles
- The UN Guiding Principles on Business and Human Rights
- International Labour Organization Conventions
- United Nations Convention Against Corruption
- OECD Guidelines for Multinational Enterprises
- Other, specify

Manual consideration of business models followed by detailed analysis procedure made with reference to PRI practical guide to ESG integration for equity investing

### Description

We manually look at each business model to consider its high level ESG impact. (We do not invest in polluting commodities, weapons or defense, gambling, alcohol, harmful media). If a company passes that manual screening we then conduct detailed ESG research as per our ESG analysis procedure as shown on our website [https://blueoceans.com.au/wp-content/uploads/2019/06/03606-blueo-priguideelines\\_a4-web-20190613.pdf](https://blueoceans.com.au/wp-content/uploads/2019/06/03606-blueo-priguideelines_a4-web-20190613.pdf)

**LEI 04.2** Describe how you notify clients and/or beneficiaries when changes are made to your screening criteria.

By updating our investment process and sustainability analysis document on our website.

|        |           |        |               |       |
|--------|-----------|--------|---------------|-------|
| LEI 05 | Mandatory | Public | Core Assessed | PRI 1 |
|--------|-----------|--------|---------------|-------|

**LEI 05.1** 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

**LEI 05.2** 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%

**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

**LEI 05.5** Additional information. [Optional]

We may review more frequently than annually if ESG issues arise. If an issue arises we will review that company completely, update our ESG report and post to our website. If an issue is material we will divest and notify our investors. We review news and updates on companies we hold weekly.

**(B) Implementation: Thematic**

|        |           |        |             |       |
|--------|-----------|--------|-------------|-------|
| LEI 07 | Mandatory | Public | Descriptive | PRI 1 |
|--------|-----------|--------|-------------|-------|



**LEI 07.1** Indicate the type of sustainability thematic funds or mandates your organisation manages.

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

**LEI 07.2** Describe your organisation's processes relating to sustainability themed funds. [Optional]

A company must not harm people or the environment and we preference companies that go further and actually contribute to climate change abatement or social improvement.

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

**LEI 08**

**Mandatory**

**Public**

**Core Assessed**

**PRI 1**

**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.

| ESG issues           | Proportion impacted by analysis  |
|----------------------|--|
| Environmental        | <div style="display: flex; align-items: center;"> <div style="width: 20px; height: 20px; background-color: #0070C0; margin-right: 5px;"></div> <div style="background-color: #0070C0; flex-grow: 1; margin-left: 5px;"></div> </div> <p style="margin-left: 20px;">Environmental</p> <p><input type="radio"/> &lt;10%</p> <p><input type="radio"/> 10-50%</p> <p><input type="radio"/> 51-90%</p> <p><input checked="" type="radio"/> &gt;90%</p>        |
| Social               | <div style="display: flex; align-items: center;"> <div style="width: 20px; height: 20px; background-color: #0070C0; margin-right: 5px;"></div> <div style="background-color: #0070C0; flex-grow: 1; margin-left: 5px;"></div> </div> <p style="margin-left: 20px;">Social</p> <p><input type="radio"/> &lt;10%</p> <p><input type="radio"/> 10-50%</p> <p><input type="radio"/> 51-90%</p> <p><input checked="" type="radio"/> &gt;90%</p>               |
| Corporate Governance | <div style="display: flex; align-items: center;"> <div style="width: 20px; height: 20px; background-color: #0070C0; margin-right: 5px;"></div> <div style="background-color: #0070C0; flex-grow: 1; margin-left: 5px;"></div> </div> <p style="margin-left: 20px;">Corporate Governance</p> <p><input type="radio"/> &lt;10%</p> <p><input type="radio"/> 10-50%</p> <p><input type="radio"/> 51-90%</p> <p><input checked="" type="radio"/> &gt;90%</p> |

|        |           |        |               |       |
|--------|-----------|--------|---------------|-------|
| LEI 09 | Mandatory | Public | Core Assessed | PRI 1 |
|--------|-----------|--------|---------------|-------|

**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 09.4** 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

# Blue Oceans Capital

## Reported Information

### Public version

#### Direct - Listed Equity Active Ownership

## PRI disclaimer

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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

## 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 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 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 type="checkbox"/> To gain an understanding of ESG strategy and/or management<br><input 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     |
| Collaborative 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 through collaboration |

|        |           |        |               |       |
|--------|-----------|--------|---------------|-------|
| 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. |
| Collaborative 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 through collaboration. |

|        |           |        |                     |         |
|--------|-----------|--------|---------------------|---------|
| 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 checked="" type="radio"/> Yes, we track the number of our engagements in full<br><input type="radio"/> Yes, we partially track the number of our engagements<br><input type="radio"/> We do not track                         |
| <b>Collaborative engagements</b>             | <input type="radio"/> Yes, we track the number of collaborative engagements in full<br><input type="radio"/> Yes, we partially track the number of our collaborative engagements<br><input checked="" type="radio"/> We do not track |

### (Proxy) voting and shareholder resolutions

|        |           |        |             |       |
|--------|-----------|--------|-------------|-------|
| LEA 12 | Mandatory | Public | Descriptive | PRI 2 |
|--------|-----------|--------|-------------|-------|

**LEA 12.1** Indicate how you typically make your (proxy) voting decisions.

**Approach**

- We use our own research or voting team and make voting decisions without the use of service providers.

**Based on**

- Our own voting policy
- Our clients` requests or policies
- Other (explain)
- We hire service providers who make voting recommendations and/or provide research that we use to guide our voting decisions.
- We hire service providers who make voting decisions on our behalf, except in some pre-defined scenarios where we review and make voting decisions.
- We hire service providers who make voting decisions on our behalf.

|        |           |        |             |       |
|--------|-----------|--------|-------------|-------|
| LEA 15 | Mandatory | Public | Descriptive | PRI 2 |
|--------|-----------|--------|-------------|-------|

**LEA 15.1**

Indicate the proportion of votes participated in within the reporting year in which where you or the service providers acting on your behalf raised concerns with companies ahead of voting.

- 100%
- 99-75%
- 74-50%
- 49-25%
- 24-1%
- Neither we nor our service provider(s) raise concerns with companies ahead of voting

**LEA 16****Mandatory****Public****Core Assessed****PRI 2****LEA 16.1**

Indicate the proportion of votes where you, and/or the service provider(s) acting on your behalf, communicated the rationale to companies for abstaining or voting against management recommendations. Indicate this as a percentage out of all eligible votes.

- 100%
- 99-75%
- 74-50%
- 49-25%
- 24-1%
- We do not communicate the rationale to companies
- Not applicable because we and/or our service providers did not abstain or vote against management recommendations

**LEA 17****Mandatory****Public****Core Assessed****PRI 2****LEA 17.1**

For listed equities in which you or your service provider have the mandate to issue (proxy) voting instructions, indicate the percentage of votes cast during the reporting year.

- We do track or collect this information
- We do not track or collect this information

**LEA 17.2**

Explain your reason(s) for not voting on certain holdings

- Shares were blocked
- Notice, ballots or materials not received on time
- Missed deadline
- Geographical restrictions (non-home market)
- Cost
- Conflicts of interest
- Holdings deemed too small
- Administrative impediments (e.g., power of attorney requirements, ineligibility due to participation in share placement)
- Client request
- Other (explain)

|        |           |        |               |       |
|--------|-----------|--------|---------------|-------|
| LEA 19 | Mandatory | Public | Core Assessed | PRI 2 |
|--------|-----------|--------|---------------|-------|

**LEA 19.1** Indicate whether your organisation has a formal escalation strategy following unsuccessful voting.

- Yes
- No



# Blue Oceans Capital

## 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.

## 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)
- 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