



RI TRANSPARENCY REPORT

2020

Regnan Governance Research and
Engagement Pty Ltd

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	✓	Public
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		✓	-

Active Ownership Services

Indicator	Short description	Status	Disclosure
AOS 01	Engagement and/or voting offerings	✓	Public
AOS 02	Acquiring ESG data and information	✓	Public
AOS 03	Identifying emerging ESG issues	✓	Public
AOS 04	Prioritizing engagement topics	✓	Public
AOS 05	Channels of engagement	✓	Public
AOS 06	Accessing the appropriate teams when engaging with companies	✓	Public
AOS 07	Monitoring engagements	✓	Public
AOS 08	Defining and measuring success	✓	Public
AOS 09	Companies changing practices/behavior following engagement	✓	Public
AOS 10	Engaging with policy makers and industry bodies	✓	Public
AOS 11	ESG in voting recommendations	✓	Public
AOS 12	Raising concerns with companies ahead of voting	✓	Private
AOS 13	Voting against management	✓	Public
AOS 14	Monitoring voting outcomes	✓	Public
AOS 15	Mechanisms for clients to review voting recommendations	✓	Public
AOS 16	Involvement in projects to improve voting trail and obtaining confirmation	✓	Public
AOS 17	Sharing ESG information on companies with clients	✓	Public
AOS End		✓	-

Research and Data Provision

Indicator	Short description	Status	Disclosure
RDP 01	Product type	✓	Public
RDP 02	Sources for research and/or rating	✓	Public
RDP 03	Stakeholder input	✓	Public
RDP 04	Up-to-date assessment and ratings	✓	Public
RDP 05	Balanced research and assessment	✓	Public
RDP 06	Consistency and comparability	✓	Public
RDP 07	Emerging ESG issues and trends	✓	Public
RDP 08	Client use of outputs	✓	Public
RDP 09		✓	Public
RDP 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	✓	Public
CM1 End	Module confirmation page	✓	-

Regnan Governance Research and Engagement Pty Ltd

Reported Information

Public version

Organisational Overview

PRI disclaimer

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Basic Information

OO 01

Mandatory

Public

Descriptive

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

Australia

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

9

Reporting Year

OO 02

Mandatory

Public

Descriptive

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

30/06/2019

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
- Investment consultancy

Investment consultancy

- Yes
- No
- Other, specify (3)
- Other, specify (4)
- None of the above

OO 05

Mandatory to Report Voluntary to Disclose

Public

Gateway

Business Area	ESG as a supplementary service	ESG integrated in services	No ESG
Active Ownership Services	<div style="background-color: #0070C0; color: white; padding: 5px;">Active Ownership Services - ESG as supplementary service</div> 0	<div style="background-color: #0070C0; color: white; padding: 5px;">Active Ownership Services - ESG integrated in services</div> 65	<div style="background-color: #0070C0; color: white; padding: 5px;">Active Ownership Services - No ESG</div> 0
Investment Consultancy	<div style="background-color: #0070C0; color: white; padding: 5px;">Investment Consultancy - ESG as supplementary service</div> 0	<div style="background-color: #0070C0; color: white; padding: 5px;">Investment Consultancy - ESG integrated in services</div> 10	<div style="background-color: #0070C0; color: white; padding: 5px;">Investment Consultancy - No ESG</div> 0
Research and Data provision	<div style="background-color: #0070C0; color: white; padding: 5px;">Research and Data provision - ESG as supplementary service</div> 0	<div style="background-color: #0070C0; color: white; padding: 5px;">Research and Data provision - ESG integrated in services</div> 25	<div style="background-color: #0070C0; color: white; padding: 5px;">Research and Data provision - No ESG</div> 0
Total	<div style="background-color: #0070C0; color: white; padding: 5px;">% of total revenue is derived from ESG supplementary services</div> 0	<div style="background-color: #0070C0; color: white; padding: 5px;">% of total revenue is derived from ESG integrated services</div> 100	<div style="background-color: #0070C0; color: white; padding: 5px;">% of total revenue is derived from service with no ESG incorporation</div> 0

OO 05.2

Indicate whether you promote the inclusion of ESG factors into investment decision making to your clients.

- Yes, we systematically do
- Yes, we occasionally do
- No, we do not

OO 05.4

Additional information. [OPTIONAL]

No additional information

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Strategy and Governance

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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.

Regnan was established by and for institutional investors to investigate and address environmental, social and corporate governance (ESG). Focusing solely on ESG for nearly two decades has ensured the depth of expertise and breadth of experience necessary to support our Australian and international clients to develop, operationalise and implement effective responsible investment strategies.

Regnan provides an engagement and advocacy program to pursue improved corporate ESG performance, and an advisory service to assist organisations embed ESG into core policies, processes and positioning and an ESG research and ratings service.

Responsible investment/ESG constitutes the entire Regnan suite of business offerings.

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

Public availability

URL

URL

<https://www.regnan.com/>

Attachment

Not publicly available

Formalised guidelines on environmental factors

Public availability

URL

URL

<https://www.regnan.com/research>

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

Public availability

- URL

URL

<https://www.regnan.com/research>

- Attachment
- Not publicly available
- Formalised guidelines on corporate governance factors

Public availability

- URL

URL

<https://www.regnan.com/research>

- Attachment
- Not publicly available
- Formalised guidelines on engagement approach

Public availability

- URL

URL

<https://www.regnan.com/engagement>

- Attachment
- Not publicly available
- 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)
 - Recruit for specific experience in ESG
- Other, specify (2)
- Other, specify (3)

 No**SG 01.5**

Additional information [OPTIONAL]

Our approach to RI/ESG and individual guidelines to environmental, social and corporate governance factors are broadly outlined on our website. Clients receive these guidelines in further detail, including the engagement guidelines and mandate, and research methodology, however details are not publicly available.

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)
 - ASX Corporate Governance Principles and Recommendations
- Other, specify (2)
 - International Corporate Governance Network standards
- Other, specify (3)
 - Task force on Climate-Related Financial Disclosure (TCFD)
- None of the above

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.

	Off the shelf	Tailored
Asset class-specific RI guidelines	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sector-specific RI guidelines	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Screening/exclusions policy	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Engagement policy	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(Proxy) voting policy	<input type="checkbox"/>	<input checked="" type="checkbox"/>
RI guidelines set out within the Investment Policy Statement (IPS)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
RI guidelines set out in a freestanding RI policy	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Multi-year RI implementation project plan	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Conflict of interest management policy	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Stockbroker allocation policy	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Securities lending policy	<input type="checkbox"/>	<input type="checkbox"/>
Other, please specify (1)	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>

please specify (1) - Tailored

We provide support to clients in developing policies tailored to their needs and circumstances. E.g. ethical screen, impact product policy, AO vs FM

SG 03.2

Provide a brief description of the key elements, any variations, or exceptions applying to these policies.

Regnan tailors all policies offered to individual client needs.

SG 04

Mandatory

Public

Descriptive

SG 04.1

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

Business area

Active Ownership Services

How you include ESG/RI factors

Regnan's active ownership service is solely focused on ESG factors. This service for asset owners/managers is a core offering, developed from a proprietary research program, prioritised in consultation with clients, to address ESG related matters that we have identified as material to long term value.

Engagement is conducted to address company specific concerns as well as ESG issues that affect multiple stocks, sectors or the portfolio more broadly.

Where shareholder resolutions on ESG issues are put to companies, we conduct tailored engagement where possible and support client voting decision making.

Investment Consultancy

How you include ESG/RI factors

Regnan's advisory service is focused solely on supporting clients in RI / ESG. This includes developing RI/ESG strategy, priorities and portfolio resilience.

Examples include the development of responsible investment strategy/frameworks, ethical decision support, stewardship programs, active ownership activities, manager ESG review, and integration of ESG into product strategy.

Research and Data Provision

How you include ESG/RI factors

Regnan's research and ratings are entirely focused on RI/ESG factors.

Regnan uses in-house proprietary methodologies to assess companies across a range of specific environmental, social and corporate governance factors.

Our ESG stock assessments employ a 'bottom up' approach, akin to fundamental research, that focuses on how ESG factors relate to financial value over the short, medium and long term.

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 type="checkbox"/>	<input type="checkbox"/>
Directors	<input type="checkbox"/>	<input type="checkbox"/>
Chief Executive Officer (CEO), Chief Financial Officer (CFO)	<input 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 type="checkbox"/>	<input type="checkbox"/>
Other heads of department	<input type="checkbox"/>	<input checked="" type="checkbox"/> <div style="background-color: #0070C0; color: white; padding: 2px; text-align: center; margin: 5px 0;">Please specify</div> All Regnan leadership roles undertake ESG implementation
Dedicated ESG/RI staff	<input type="checkbox"/>	<input checked="" 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

SG 04.5

Describe the ESG/RI linked incentives.

As all Regnan staff are responsible for the implementation of ESG/RI given it is our core offering as a business, ESG/RI incentives are inherently linked to remuneration. KPIs are primarily ESG/RI related.

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

SG 04.7

Additional information [OPTIONAL]

Regnan became a Pental group business on 1 March 2019 reporting to the Pental Australia CEO. Other than admin roles, all Regnan staff are responsible for implementation of ESG/RI and all leadership roles are responsible also for oversight, as it is our core offering as a business. We note that the COO is the most senior role within the Regnan organisation, who reports to the CEO of Pental Australia.

SG 05

Mandatory to Report Voluntary to Disclose

Public

Descriptive

SG 05.1

Indicate whether you outsource some of your services. Report percentage of services outsourced as percentage for that specific business area.

Business area

- Active Ownership Services
- Investment Consultancy
- Research and Data Provision
- None of the above

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 06.2 Describe the main components of your training/educational services on ESG/RI and any variations depending on the group you provide training/education to.

Training on RI is a core activity. Content varies with client needs. In this reporting period it has included: climate change risk and disclosure, introduction to ESG/RI, understanding evolving regulator expectations, fiduciary responsibilities, how to differentiate RI approaches, evaluating asset management RI strategies, and developing effective theories of change.

SG 06.3 Describe whether these training/educational services include any commercial elements.

It depends on the nature of the project. Some training, when offered as part of active ownership and our advocacy program, does not include commercial elements. However, at times training is conducted as part of advisory contracts undertaken on a commercial basis.

SG 07	Mandatory	Public	Descriptive
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SG 07.1 Describe how your organisation applies, advances and promotes the PRI Principles.

Regnan's suite of offerings is entirely directed towards advancing responsible investment; our philosophy is closely aligned to the PRI principles, which are applied across all business activities, and Regnan supports the PRI itself to advance its agenda.

More specifically, Regnan's engagement and research offerings support clients in adhering to the six principles. Regnan also assists clients in meeting their specific obligations under the PRI, including reporting.

When developing tailored advice to advisory clients that are seeking to embed ESG across their business activities, we may recommend that the client becomes a signatory to the PRI and assist them in meeting their commitments.

Regnan also actively seeks collaborative engagement opportunities with likeminded organisations which advance the principles. Where aligned with client-approved mandates for engagement and advocacy, Regnan will participate in collaborative engagement initiatives coordinated by the PRI, for instance our participation in the Climate Action 100+ initiative.

Examples of our research, policy engagement and media appearances can be found in the 'Insights and Publications' section of our website at <https://www.regnan.com/public-submissions>.

SG 08	Mandatory	Public	
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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
Participated in academic research on responsible investment.
- None of the above

SG 08.2

Additional information. [OPTIONAL]

Examples of our research, policy engagement and media appearances can be found in the 'Insights and Publications' section of our website at <https://www.regnan.com/public-submissions>.

Both directly and through our membership of Investor Group on Climate Change (IGCC) and Responsible Investment Association Australasia (RIAA), we have engaged with public policy-makers or regulators on the following topics during the reporting year:

- CPS511 submission (not yet released by the regulator at the time of writing, will be available at <https://www.apra.gov.au/consultation-on-remuneration-requirements-for-all-apra-regulated-entities>)
- Provided input and in-kind support to responsible investment initiatives such as the Australian Sustainable Finance Initiative (ASFI) - Developing an Australian Sustainable Finance Roadmap: Progress Report Summary <https://www.sustainablefinance.org.au/>
- Attended the PRI Sustainable Finance Policy Conference, an input to its whitepaper 'Taking stock: Sustainable finance policy engagement and policy influence', available from the link at <https://www.unpri.org/pri/pri-blog/pri-first-sustainable-finance-policy-conference-heres-what-we-discussed>
- Offered input to professional networks and peer initiatives, concerning appropriate RI / ESG disclosures and related matters.

In recent years, topics have included ESG disclosure, whistleblowing, remuneration, climate change, corporate governance and modern slavery.

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.

Changing demographics are factored into Regnan engagement and research offerings. For example, diversity and human capital management considerations such as aging workforces or changing customer or stakeholder demographics are analysed by Regnan when assessing a stock's ESG characteristics. Companies in which concerns are held regarding management of these issues may be recommended for engagement. Detailed behavioural change objectives will be developed to be pursued in engagements with the company.

Further, changing demographics influence recommendations to advisory clients. For example, considerations regarding the rise of millennial influence and the increased wealth of women have shaped advisory recommendations to clients about the value of RI product offerings.

In addition, shifts in the demographics of participants in public company scrutiny (with developing country observers and activists increasingly connected and visible to developed country audiences) has introduced additional nuance to preferred outcomes from engagement.

 Climate change**SG 09.2**

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

Climate change has been a major theme across Regnan's research and engagement services for more than 14 years. In our current product outputs, we look to see evidence of companies building resilience to climate change, mitigating risks of the physical impacts of climate change, careful consideration of the regulatory environment and market changes as we transition to a low carbon economy, and the ongoing need for enhanced climate related disclosure. Stocks assessed through the research offering as being of elevated concern may be included as a targeted company for corporate engagement.

Regnan's advisory offering is also shaped by climate change considerations. It can support clients in managing a variety of climate related risks, but also in capitalising on opportunities for value creation.

 Resource scarcity**SG 09.2**

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

Considerations around resource scarcity are factored into Regnan's research and engagement. Regnan research analysts assess each company's exposure and management of resource scarcity risk and incorporate the assessment into the stock's ratings. These research and ratings feed into Regnan's engagement program recommendations. If a company's exposure and/or resource management warrants elevated concern, Regnan will pursue targeted outcomes via direct corporate engagement.

 Technology developments

SG 09.2

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

Technology developments are factored into Regnan's research and engagement. In stock level assessments, Regnan analysts look to see evidence of sound management of risks and opportunities related to technology developments in exposed companies. Ranging from developments in automation and artificial intelligence, through to developments in clean energy and advanced materials, Regnan assesses the potential impact in areas such as human capital management, board capacity, stakeholder management, environmental management, future of the workplace and ethical conduct. If a company's exposure to and/or management of advances in technology warrants elevated concern, Regnan will pursue targeted outcomes via direct corporate engagement.

- 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

Frequency

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

Frequency

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

Frequency

- Daily
 - Weekly
 - Monthly
 - Quarterly
 - Bi-annually
 - Annually
 - Ad-hoc basis
 - Other, specify
- Formal regular meetings outside of committee meetings

Frequency

- Daily
 - Weekly
 - Monthly
 - Quarterly
 - Bi-annually
 - Annually
 - Ad-hoc basis
 - Other, specify
- Informal meetings or calls

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

- Daily
- Weekly
- Monthly
- Quarterly
- Bi-annually
- Annually
- Ad-hoc basis
- Other, specify
- Other, specify (1)

Formal reporting on engagement activities.

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

- Daily
- Weekly
- Monthly
- Quarterly
- Bi-annually
- Annually
- Ad-hoc basis
- Other, specify
- Other, specify (2)
- Other, specify (3)
- No, we do not

SG 11	Mandatory	Public	Descriptive
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SG 11.1	Describe how you typically align your organisation’s philosophy and approach to ESG/RI with your investor clients’ goals.
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- Describe

Regnan was established by and for institutional investors, and its philosophy and approach is entirely driven by investor goals to improve the alignment of their investments with long term risk-adjusted returns outcomes and, where appropriate, other responsible investment objectives.
- This is not relevant for my organisation

SG 12	Mandatory	Public	Descriptive
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SG 12.1

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

Describe

Regnan's core activities involve identifying sources and instances of such misalignment for its clients. In the instances where potential misalignment could occur, we open dialogue with the client to more fully explain our recommendation and gain further understanding of their position. We respect clients' decisions to not adhere to each of our recommendations, recognising their individual operating environment and needs. Should repeated misalignment occur, we would re-consider the provision of service.

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.

Regnan's entire business involves providing RI/ESG product and service offerings on a commercial basis. In this context, incorporating market feedback is a core business activity.

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.

Regnan adheres to Pandal policies. Pandal has an internal trading and conflicts policy, with all conflicts being centrally recorded.

Regnan also discloses all potential conflicts to affected parties, including clients. Where necessary, barriers (physical, technological and behavioural) are established within the business.

We also have additional policies in place, effectively ensuring the independence of our work from Pandal's influence. An overview of the governance in place to support this can be found on our website <https://www.regnan.com/governance>.

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.

Regnan adheres to the policies of its parent Pandal Group including its securities trading policy applicable to all employees. All personal trading must receive prior approval from Pandal's Risk and Compliance team.

No

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Active Ownership Services

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Active ownership services

AOS 01	Mandatory	Public	Gateway
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AOS 01.1 Indicate which active ownership services are part of your business offerings. Tick all that apply.

- Engagement
- Voting

AOS 01.2 Indicate which markets your organisation covers.

- Developed markets
- Emerging markets

AOS 01.3 Additional information [OPTIONAL]

We provide a limited voting service on selected ESG-related shareholder resolutions.

AOS 02	Mandatory	Public	Descriptive
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AOS 02.1 Indicate where you acquire your ESG data and information.

- Regulatory sources
- Information from stakeholders and NGOs
- In-person meetings or calls with company, industry, municipality or government representatives
- Media reporting (including social media, blogs and similar)
- Primary data (self-reported from companies or other organisations)
- Secondary data (from ESG research provider databases)
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)

AOS 02.2 Describe how this information is used in your product/service offerings.

One of Regnan's core product offerings is the ESG research and analysis produced by this process. A second core product offering is the engagement and stewardship service which is based on risks identified by this process.

AOS 03	Voluntary	Public	Descriptive
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AOS 03.1 Indicate whether you identify emerging ESG issues.

- Yes

AOS 03.2 Describe how you identify emerging ESG issues.

Regnan maintains a team of experienced research analysts who conduct continuous research on companies, existing issues, and emerging issues. Our engagement program enables a discussion of first-hand company experience to further test and validate our conviction with respect to these themes ahead of the establishment of formal change objectives and/or advocacy activities.

AOS 03.3 Describe some of the emerging ESG issues you have identified in this process.

Regnan has been early to identify a number of emerging ESG issues material to company performance. These have included:

- Our understanding of ESG risks in the unconventional oil and gas sector on which we began engaging in 2013.
Thanks to Regnan’s in house expertise on energy and mining sector issues, combined with a proactive gathering of further intelligence through the engagement program, we were able to identify heightened risks relating to unresolved technical, regulatory, environmental and stakeholder issues that have been amplified by the sector’s rapid growth. Building on prior research and engagement, Regnan invested in the development of a position paper on the topic, to frame a more constructive discussion with affected companies and to outline ESG risk management approaches.
- Identifying risks associated with companies supporting industry associations that lobby for positions counter to the strategic direction of the company. Not only does this create reputational risks for companies but may result in policy settings that impede execution of strategy. We identified this risk on a range of issues, including but not limited to climate lobbying and have engaged with companies on related matters for more than a decade. This risk became apparent following the ongoing newsflow scanning that is part of our ideation process, and we tested it extensively in engagement with individual companies as we developed this area of focus.
- During the recent Royal Commission into Misconduct in the Banking, Superannuation and Financial Services Industry in Australia we identified that a number of the key themes from the commission’s findings had applications outside of financial services. We view these as emerging issues for a number of sectors should they not heed the lessons to be learned from the finance sector.

No

Engagement

AOS 04

Mandatory

Public

Descriptive

AOS 04.1

Describe how you select priority engagement topics to raise with companies and how you involve your clients in this process.

The objective of Regnan’s engagement is to sustain and enhance value for clients. To this end, the three primary factors taken into account in determining engagement priorities are:

- The value at risk for the listed entity from that issue (and conversely the upside potential from change). The primary input to this assessment is Regnan’s research scores that focus on the gap between an entity’s exposure and its response to it. Scores are supplemented by analyst insight.
- The extent to which clients of our engagement service are exposed to the entity. Given that all of our engagement clients are large institutional investors, market capitalisation is used as a proxy for portfolio weight.
- The value of engagement activity in achieving change. This includes considerations such as strength of business case, capacity for change, and the additionality of Regnan’s contribution to achieving this change (when considering activity being undertaken by others).

AOS 04.2

Describe how you define the objectives and milestones of the engagements and how you involve your clients in this process.

Regnan formally proposes all new engagement activity to clients and seeks approval of the mandate prior to commencing engagement with stocks. Proposals present Regnan’s recommendations for ESG issue

and stock specific engagements to clients, including priority tiers, rationales and behavioural change objectives.

AOS 05	Mandatory	Public	Descriptive
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AOS 05.1 Indicate what channels you use to engage. Tick all that apply and indicate the frequency with which you typically use the channels.

Engagement type

- Letters and e-mails

Frequency

- In minority of cases
- In majority of cases
- In all cases

- Meetings and/or calls with board/senior management

Frequency

- In minority of cases
- In majority of cases
- In all cases

- Meetings and/or calls with the CSR, IR or other management

Frequency

- In minority of cases
- In majority of cases
- In all cases

- Visits to operations

Frequency

- In minority of cases
- In majority of cases
- In all cases

- Visits to supplier(s) from the company's supply chain

- Other (1), specify

Investor roadshows

Frequency

- In minority of cases
 - In majority of cases
 - In all cases
 - Other (2), specify
- Materiality interviews and surveys including via third parties (e.g. assurance providers)

Frequency

- In minority of cases
- In majority of cases
- In all cases
- Other (3), specify

AOS 05.2 Describe your typical execution method.

Regnan's engagement process involves:

1. Detailed research to identify the issues and companies to be prioritised.
2. Explicit setting of objectives for change for identified companies.
3. Contact with the companies, as above.
4. Follow-up correspondence, where appropriate, to secure evidence of changes.
5. Monitoring of company public disclosures for evidence of the changes sought.
6. Formal, regular reporting to clients on both activities and progress against pre-set objectives.

AOS 06	Mandatory	Public	Descriptive
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AOS 06.1 Indicate from the options below the employee at the companies you typically engage with.

- Employee level**
- Board members

Frequency

- In minority of cases
- In majority of cases
- In all cases
- Corporate secretary/general counsel

Frequency

- In minority of cases
- In majority of cases
- In all cases
- CEOs

Frequency

- In minority of cases
- In majority of cases
- In all cases
- Other C-level staff or heads of departments

Frequency

- In minority of cases
- In majority of cases
- In all cases
- Investor relations-teams

Frequency

- In minority of cases
- In majority of cases
- In all cases
- Sustainability/CSR team members

Frequency

- In minority of cases
- In majority of cases
- In all cases
- Non-management employees
- Other, specify (1)

Other executives, where they have greater responsibility for, or exposure to, specific topics of concern within the organisation.

Frequency

- In minority of cases
- In majority of cases
- In all cases
- Other, specify (2)
- Other, specify (3)

AOS 06.2 Describe how you ensure the client's rationale and engagement objectives are being communicated clearly to the company at the beginning and during the dialogue phase.

Regnan's engagement service includes developing the rationale and specific change objectives on behalf of participating clients. Formal processes provide for clients to approve these and the implementation of the program proceeds on the agreed basis. Engagements are typically attended by two or more team members working to an agreed set of meeting objectives and are lead by senior team members with significant experience in engagement as well as familiarity with client priorities and engagement objectives.

AOS 06.3

Describe the escalation strategies you take (or suggest that your clients take) when the engagement objectives are not achieved.

Further information about engagement implementation is considered to be commercial in confidence. We are happy to discuss this with clients, where desired.

AOS 07

Mandatory

Public

Descriptive

AOS 07.1

Indicate how you monitor the progress of engagements.

- Define timelines/milestones for your objectives
- Track and/or monitor progress against defined objectives
- Track and/or monitor progress of actions taken when original objectives are not met
- Review and, if necessary, revise objectives on an ongoing basis
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)
- None of the above

AOS 07.2

Describe how you typically decide what recommendations for next steps to give to clients.

- Yes, we do provide clients with recommendations for next steps

Monthly client reporting summarises engagements undertaken on behalf of clients and communicates next steps. Given that engagement is undertaken to seek action consistent with pre-agreed change objectives, we would typically decide recommendations for next steps according to the degree to which we are satisfied that the agreed change objectives have been met.

Other factors may include:

- Whether there have been agreed next steps with the company during our engagement (for instance the company may request more information from us, suggest we meet with a technical expert within the business etc.)
- The timing and extent to which the issues discussed may be relevant to client voting.
- The degree to which a company is significant to an individual client (for instance poses a reputational risk because of the client's member base and/or may be a significant holding within a client's portfolio). In some instances this has led to clients exiting a stock.

- We do not provide clients with recommendations for next steps

AOS 07.3

Additional information [OPTIONAL]

Regnan looks for progress in public documentation, not just from private assurances from companies concerned.

AOS 08

Mandatory

Public

Descriptive

AOS 08.1

Describe how you define success when evaluating/reviewing engagements on ESG factors.

Regnan considers an engagement successful when the issue of concern that led to engagement being prioritised is considered to be addressed. We draw on Regnan's in house research to make this

assessment. This may be evident through documented change objectives being met, but achievement of change objectives is not, in itself, the key performance criterion.

We look for publicly available evidence of changes, rather than relying on private assurances.

AOS 08.2 Describe how you measure success when evaluating/reviewing these engagements.

Regnan evaluates whether progress is evident in relation to the issue of concern that led to engagement being prioritised (including whether the issue is fully addressed, at which point the engagement will be considered complete). We also seek to capture positive changes in areas addressed in engagement beyond the core documented priorities.

We also evaluate engagements on a range of other activity and quality measures, such as frequency of engagement and diligence of follow up on next steps.

AOS 09	Voluntary	Public	Descriptive
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AOS 09.1 Indicate the number of companies with which you engaged during the reporting year.

54

AOS 09.2 Indicate whether you track the number of cases where a company changed its practices during the reporting year, or made a formal commitment to do so, following your organisation's engagement activities during the reporting year.

Yes

AOS 09.3 Indicate the percentage of companies that changed or made a formal commitment to change in the reporting year following your organisation's engagement activities.

%

72

No

AOS 09.4 Additional information. [OPTIONAL]

Of current engagements, 88% have demonstrated progress over the last two years.

AOS 10	Voluntary	Public	Descriptive
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AOS 10.1 Indicate whether your organisation engaged with public policy makers and industry bodies on ESG engagement topics or regulatory/policy issues that could advance ESG engagement in the reporting year.

- Yes, individually
- Yes, in collaboration with others
- No

AOS 10.2

Describe what ESG factors and/or regulatory/policy issues have informed your decisions to engage with policy makers and industry bodies. Provide examples.

A range of ESG factors have informed our engagement with policy makers and industry bodies. Most typically we engage where the underlying issues are systemic and where either the current policy environment may deter actions to address ESG issues or conversely where policy signals may promote action, for instance with respect to disclosure. In recent years, climate change-related issues have been the most prominent.

In some cases, this is done in collaboration with other ESG/RI groups such as the Responsible Investment Association Australasia and the Investor Group on Climate Change (Australia).

During the last 12 months, we provided a submission to the Australian Prudential Regulatory Authority's (APRA) draft standard on remuneration. We noted a number of areas where further clarity would assist in effective implementation and highlighted potential risks from requirements for greater components of at risk remuneration to be linked to non-financial indicators. These comments were designed to identify areas for increased vigilance rather than opposing the inclusion of non-financial measures per se.

Voting

AOS 11**Mandatory****Public****Descriptive****AOS 11.1**

Describe how ESG factors are taken into consideration in voting recommendations.

As a specialist ESG provider, ESG perspectives are central to the support we provide clients on voting deliberations.

While we do not provide a comprehensive proxy recommendations service, our research and engagement outputs are relevant to voting deliberations, especially our stock ratings across environment, social and corporate governance factors, and our reporting to clients on engagement undertaken, which often directly addresses voting matters. We draw on our stock level assessments of ESG factors and engagement insights in responding to client queries on voting matters.

Additionally, we actively highlight ESG perspectives relevant to voting deliberations for environment and social matters subject to shareholder proposals and other voting matters where we consider Regnan research and/or engagement insights likely to be additive.

AOS 13**Mandatory****Public****Descriptive****AOS 13.1**

Indicate the proportion of votes where you have communicated the rationale to companies when you, on behalf of your clients, abstain or vote against management proposals.

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

AOS 13.2

Indicate the reasons you would communicate to companies, the rationale for abstaining or voting against management recommendations.

- Votes in selected markets
- Votes in selected sectors
- Votes relating to certain ESG issues
- Votes on companies exposed to controversy on specific ESG issues
- Votes for significant shareholdings
- On request by clients
- Other; explain

AOS 13.3

Additional information [OPTIONAL]

We do not vote on behalf of clients, but rather provide information relevant to voting deliberations and, in some instances, specific voting recommendations.

In most cases, the rationale for our recommendation is communicated to companies in general terms as part of the course of ongoing engagement with the company.

AOS 14**Mandatory****Public****Descriptive****AOS 14.1**

Describe how you monitor voting outcomes.

Via company annual general meeting and results announcements.

AOS 14.2

Describe how you typically decide what recommendations for next steps to give to clients.

- Yes, we do provide recommendations for next steps

We provide clients with information both in advance of and post the AGM season. This includes details of which AGMs are likely to include aspects relevant to environmental and social issues, including shareholder resolutions, as well as potentially controversial governance aspects.

Prior to the meeting we may provide clients with additional information relevant to their voting deliberations.

After the meeting we provide a summary of the season, including key trends and emerging issues as relevant and planned next steps.

These next steps are informed by a range of factors including but not limited to: the extent to which we have engaged with the company ahead of the meeting; our view on the vote (particularly where it differs to the management recommendation or was controversial); the result of the vote and the extent to which it may require elaboration/ additional context; the materiality of the issue relative to other engagement priorities and our understanding of client sensitivities.

- We do not provide recommendations for next steps

AOS 14.3

Additional information [OPTIONAL]

Continuing on the above (14.2):

Next steps might include: engagement with the company (typically in person); factoring the result into decision making with respect to future AGMs - both for the company in question or others in a similar position; opportunities for public advocacy where appropriate; formal inclusion of the company into our engagement program (with client approval).

In addition, we may advise clients on additional steps they may wish to take.

AOS 15	Mandatory	Public	
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AOS 15.1 Indicate whether you have formal mechanisms in place for clients to review your voting recommendations.

- Yes
- No

AOS 15.3 Additional information [OPTIONAL]

We do not vote on clients' behalf. We provide clients with a detailed research note to support them in their understanding of the issue. This note acknowledges that clients have competing priorities (from member interest to their own voting policies) and therefore our voting recommendation is a suggestion supported by a detailed discussion of the issue, including specific voting considerations (for instance, the investors' own public commitments).

AOS 16	Mandatory	Public	Descriptive
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AOS 16.1 Describe your involvement in any project to improve the voting trail and/or to obtain vote confirmation for your clients.

- Yes, we are involved in projects to improve the voting trail and/or to obtain vote confirmation for our clients
- Not applicable

Communication and sharing ESG information

AOS 17	Mandatory	Public	Descriptive
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AOS 17.1 Indicate whether you proactively disclose your engagement and/or voting outcomes to clients and the public.

Engagement

Clients

- Disclosed quarterly or more frequently
- Disclosed biannually
- Disclosed annually
- Disclosed less frequently than annually
- Disclosed ad hoc/when requested

Public

- Disclosed quarterly or more frequently
- Disclosed biannually
- Disclosed annually
- Disclosed less frequently than annually
- Disclosed ad hoc/when requested

Voting

Clients

- Continuously (soon after votes are cast)
- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc/as requested

Public

- Continuously (soon after votes are cast)
- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc/as requested

AOS 17.2 Indicate how you ensure all ESG information on companies gained as a result of engagement and/or voting activities is shared with clients.

Engagement

- We proactively ensure that all ESG information is made available.
- We share all ESG information upon request.
- We do not make any additional ESG information available.

Voting

- We proactively ensure that all ESG information is made available.
- We share all ESG information upon request.
- We do not make any additional ESG information available.

AOS 17.3 Additional information [OPTIONAL]

We report monthly to clients on all engagement activities conducted on their behalf, including detailed information about topics discussed in meetings and via formal correspondence. Specific alerts may be prepared with respect to voting issues in time for client deliberations.

Regnan Governance Research and Engagement Pty Ltd

Reported Information

Public version

Research and Data Provision

PRI disclaimer

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Product level

RDP 01

Mandatory

Public

RDP 01.1 Indicate your product type. Tick all that apply.

- Analysis
- Benchmarking reports
- ESG ratings
- Credit ratings
- ESG indices
- Raw data
- Second party opinion on green or social bonds
- Surveys
- Other, specify

Screening

RDP 01.2 Indicate whether you make any of your products publicly available.

- Yes, all products
- Yes, some products
- No, we do not

RDP 01.3 Additional information. [OPTIONAL]

We make some analysis available when in line with our stewardship objectives.

Research/process level

RDP 02

Mandatory

Public

RDP 02.1 Indicate the types of sources you use for research and/or ratings of companies/sectors/geographies or similar. Tick all that apply.

- Your organisation`s independently collected data from public sources
- Regulatory sources
- Information from NGOs and other stakeholders
- In-person meetings or calls with company or industry representatives
- Primary data (self-reported from companies or other organisations)
- Secondary data (from other research provider databases)
- Other, specify (1)

Interviews with corporate and industry representatives

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

RDP 02.2 Indicate how ESG factors are incorporated into your research and/or rating methodology

- Identifying exposure and risk to ESG factors
- Considering responses to self-assessment questions on ESG
- Assessing current and future capacity to manage or mitigate ESG risks
- Assessing past and potential future performance on ESG factors
- Assessing alignment and compliance to different policies and regulations
- Assessing alignment and compliance explicitly to the Sustainable Development Goals (SDGs)
- Assessing current and future positive ESG impacts
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)

RDP 02.3 Describe how you define materiality and how this is captured in your research and/or rating methodology as well as final product.

Regnan’s ESG research provides high quality information and analysis that is material to valuation. This enables the extension of fundamental analysis to more thoroughly integrate strategic and agency risks (and opportunities) and is distinct from approaches that are norms-driven (i.e. ESG as intrinsically valuable).

Regnan applies the concept of ‘materiality’ in the same way equity analysts apply the concept. Our in-depth issues research assesses the nature, probability and likely consequences of ESG issues in terms of impact on future cashflows and valuation, and the mechanisms by which these might occur.

Supported by documented methodologies, our highly experienced analyst team applies judgement in assessing materiality of ESG factors in financial terms against clearly defined benchmarks (expressed as percentages of future earnings) which translate into our ‘scores’ for each ESG factor.

RDP 03	Mandatory	Public	Descriptive
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RDP 03.1 Describe how you actively include input and information, wherever possible, from relevant stakeholders or interested parties, in the research process or in reaching assessment conclusions.

As part of our research process we actively scan for stakeholder perspectives, including through continuous media searching, which the research analyst drafting conclusions is responsible for review. We may also have direct discussion with key stakeholders as part of reaching assessment conclusions.

RDP 04	Mandatory	Public	Descriptive
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RDP 04.1

Indicate how you ensure that your ESG assessment of companies/ sectors/ geographies or similar is up-to-date and that new information is incorporated or new assessments are conducted at reasonable intervals.

- Regular update cycles (annual or more frequent)
- Allowing assessments/ ratings to be adjusted at any time by your organisation
- On-going alerts systems in place for new events and information that might have implications on the original assessment/ ratings
- On-going monitoring of possible controversies and compliance to conventions, regulations and similar
- Providing tools for companies/ sectors or others to update the researcher, rating agency or data provider with new information
- Other, specify (1)
Ongoing dialogue with companies through our engagement activities.
- Other, specify (2)
- Other, specify (3)

RDP 05**Mandatory****Public****Descriptive****RDP 05.1**

Indicate how you typically ensure a balanced approach to your research methodology and assessing/rating of companies/sectors/geographies or similar. Tick all that apply and explain your approach to each option.

Type of indicators

- Balancing quantitative and qualitative indicators

Explain your approach

Regnan uses and produces both qualitative and quantitative information, has extensive documented methodologies, a highly experienced team, and internal quality review processes.

- Balancing management/process oriented indicators and performance indicators

Explain your approach

As above.

- Balancing reference to past and current performances, such as whether the rating object's performance is improving or deteriorating

Explain your approach

As an input for funds managers, Regnan's focus is on leading indicators (which include past performance, but does not rely exclusively on past performance).

- Balancing environmental, social and governance indicators

Explain your approach

Regnan assesses each of the three areas separately and does not currently provide a combined ESG score.

- Balancing self-reported and public data

Explain your approach

Analysts apply judgement and do not formally weight different sources of information. Regnan does not rely on raw data (self-reported or otherwise) for making assessments.

- Other, specify (1)
- Other, specify (2)
- None of the above

RDP 05.2 Additional information. [OPTIONAL]

Regnan's core research is exclusively concerned with ESG and the applicability of identified ESG issues to the securities within its universe.

This is intended for use alongside non-ESG considerations and therefore does not seek to achieve a "balance" across factors, through time, or within or across sectors (other than for "best of sector" ratings).

RDP 06	Mandatory	Public	Descriptive
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RDP 06.1 Describe the control processes in place to ensure quality of research.

Regnan has extensive documented methodologies across all aspects of ESG research and a long history of research from which to draw examples and benchmark.

New staff are inducted over a six month period to ensure they are fully trained to implement Regnan methodologies in a consistent way. Consistency of scoring is critical because our research is intended (and repeatedly been shown) to provide investment signals. Backtesting is undertaken to provide a further confirmation of quality and consistency.

Senior members of the Regnan team conduct both formal and informal peer reviews of the analyst team's work. Formal peer review typically occurs twice during the assessment process.

1. A pre-assessment review is conducted to ensure that the analyst is focused on all of the material ESG issues affecting the company.
2. Once the assessment process is completed, final peer review is conducted to ensure accuracy of assessment and alignment with the Regnan research methodology.

Informal peer review occurs on a regular basis between the analyst team and with senior personnel as issues arise.

Ongoing training is undertaken on research methodologies and ESG topics.

Engagement with companies in our research universe and client feedback provides further checks on quality.

RDP 07	Voluntary	Public	Descriptive
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RDP 07.1 Indicate whether you identify and prioritise ESG issues and emerging trends.

- Yes

RDP 07.2 Describe how you incorporate the identified ESG issues and trends in your product offerings and business activities.

Our core research offering is focused on ESG research and as such all ESG issues are prioritised, and emerging trends continually considered, in assessments.

Not applicable for our organisation

RDP 08	Voluntary	Public	Descriptive
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RDP 08.1	Describe how research and data provision outputs are used by clients.
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Describe

	Describe how research and data provision outputs are used by clients.
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Regnan's research and data is used by clients in their investment and voting decision making, asset allocation choices, and as an input to their own engagement activities. Asset owner clients also use Regnan's research to screen prospective managers, and to inform questions regarding stock selection of existing managers.

Not applicable for our organisation

RDP 09	Voluntary	Public	Descriptive
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RDP 09.1	Provide examples of cases where ESG was incorporated into your services and the tracked impact it had for investor clients in their decision making process and/or active ownership activities.
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Case example 1

	Description of ESG service provided and the impact it had on investor client's investment decision making and/or active ownership activities.
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Regnan provides voting advice to research and engagement clients on special resolutions at company annual general meetings brought under Section 249N of the Corporations Act. Advice is provided on environmental and social issues, and contentious governance topics. The advice is used by clients to inform their meetings with the companies on the issue, and in formulating their voting positions. On numerous occasions in 2019, clients provided Regnan with feedback that our advice, and the accompanying detailed analysis, informed the questions asked by clients at meetings with companies, as well as voting outcomes. Examples include resolutions tabled with ANZ Banking Group Ltd, Coles Ltd, and Qantas Airways Ltd.

Case example 2

	Description of ESG service provided and the impact it had on investor client's investment decision making and/or active ownership activities.
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Regnan's ESG data and narrative reports are used by a superannuation fund client to identify companies with unmanaged ESG risks within its Australian shares portfolio. The data and reports are used to build a case for company engagement and to inform meeting agendas and preparation notes.

Case example 3

Description of ESG service provided and the impact it had on investor client's investment decision making and/or active ownership activities.

A wealth management client uses Regnan's ESG data to run a quarterly screen of its Australian shares portfolio to identify poorly performing companies. The screen provides the basis for questions to the client's external managers. The client asks the managers to either justify the investment or to engage with the company to improve ESG risk management.

Case example 4

Description of ESG service provided and the impact it had on investor client's investment decision making and/or active ownership activities.

Regnan provided support for client participation in Climate Action 100+, providing detailed research to support their role as lead investor. This included advice on how to approach and run subsequent engagement meetings and assess progress made via its engagement.

Case example 5

Description of ESG service provided and the impact it had on investor client's investment decision making and/or active ownership activities.

Regnan provided consulting advice to the PRI in relation to the potential to evolve Principle 2. This has subsequently been adopted by the PRI as a preferred pathway for the development of its Active Ownership program(s).

Regnan Governance Research and Engagement Pty Ltd

Reported Information

Public version

Confidence building measures

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Confidence building measures

CM1 02	Voluntary	Public	Descriptive
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CM1 02.1 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/ESG processes (that have been reported to the PRI this year)
- Internal audit of the correct implementation of RI/ESG processes and/or accuracy of RI/ESG data (that have been reported to the PRI this year)
- Internal verification and/or audit of responses before submission to the PRI (e.g. by the CEO or the board)

Which part of report has been internally verified?

- Whole PRI Transparency Report has been internally verified
- Selected data has been internally verified

CM1 02.2 Whole PRI Transparency Report or selected data has been internally verified

Who has conducted the verification

- Board
- Director(s)
- Chief Executive Officer (CEO)
- Chief Financial Officer (CFO)
- Other chief level staff, specify
- Other heads of department, specify
 - Head of Client Services**
 - Dedicated ESG/RI staff
 - Internal audit function
 - Compliance function
 - Legal department
 - Other role, specify
 - Other role, specify
 - Other role, specify
- Other, specify
- None of the above

CM1 02.3

We plan to assure this year's PRI Transparency report by a third party.

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

CM1 02.4

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. Specify the selected data
- We did not assure last year's PRI Transparency report
- None of the above, we did not report last year

CM1 02.5

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, specify
- 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 02.7

Additional information. [OPTIONAL]

Our research is used in a number of products that are themselves certified (e.g. by the Responsible Investment Association Australasia) which includes a review of our approach and processes.