



RI TRANSPARENCY REPORT

2020

Frontier Advisors

About this report

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

The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information. As a result, the reports can be extensive. However, to help easily locate information, there is an **Index** which highlights where the information can be found and summarises the indicators that signatories complete and disclose.

Understanding the Index

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

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

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

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

Index

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

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

Investment Consultancy

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

Confidence building measures

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

Frontier Advisors

Reported Information

Public version

Organisational Overview

PRI disclaimer

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

Basic Information

OO 01

Mandatory

Public

Descriptive

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

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

70

OO 01.5 Additional information.[OPTIONAL]

Frontier Advisors is Australia's leading independent asset consultant. We have been successfully advising Australian institutional investors since 1994. With some of the nation's leading analysts and advisors in our team, we provide advice to institutional investors across the superannuation, liability-driven, charity, public sector and higher education sectors. We have over 70 people working in our team and A\$390 billion in assets under advice.

Frontier has four shareholders: AustralianSuper, Cbus, HESTA and FIRST Super. Our owners direct us to focus solely on investment advice and research. Their primary interest in owning Frontier has always been, and remains, ensuring a strong and truly independent asset consulting practice exists to serve Australian institutional investors.

Frontier provides a truly differentiated proposition for the Australian institutional investment market. To evolve with the changing needs of our client base, we have professionals with extensive specialist experience to focus on in-depth research into key areas such as equities, property, debt and infrastructure. At the same time, we have continued to develop and harness broad generalist consulting skills. This balance of specialist and generalist skills, combined with exceptional client service skills, delivers a flexible offering for our clients. Frontier has a firm conviction around the importance of unconflicted advice. Frontier does not offer investment products, has no commercial affiliation with investment managers or banks, and we do not receive any commissions for our advice.

Specifically with regard to responsible investment, we continue to develop our approach, further integrating ESG factors into the advice we provide to clients. We are also continually working to embed the assessment of key ESG risks and opportunities into our investment and manager research, and actively engage with the funds management industry on these issues. Fund manager approaches to ESG forms a significant part of the due diligence undertaken by each Research Team. We seek to understand if managers are genuine in the incorporation of ESG matters, and ESG incorporation is formally assessed as part of our manager ratings process. We recognise that there is no "one size fits all" approach for responsible investment, with tailored advice provided across the client base, given the diversity in our clients' ESG philosophy and level of specialisation within their internal teams.

Reporting Year

OO 02	Mandatory	Public	Descriptive
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OO 02.1	Indicate the year end date for your reporting year.
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31/12/2019

Signatory category and services

OO 03	Mandatory	Public	Gateway
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OO 03.1	Indicate which of the following categories reflect your core offering or main business activity:
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- Reporting
- Active Ownership Services
- Investment consultancy
- Research and Data Provision
- Other, specify (1)
- Other, specify(2)

OO 03.2

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

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

Frontier Advisors

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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.

Frontier's summary Responsible Investment Philosophy is stated as follows:

"We integrate responsible investment into our process to identify and manage material Environmental, Social and Governance (ESG) risks and investment opportunities, because ESG factors impact investment performance sustainability."

The Responsible Investment Philosophy forms part of Frontier's Investment Philosophy. Frontier considers the combination of "traditional" and responsible investment considerations to represent the full extent of investment factors that investors must address to achieve their long-term investment performance objectives.

Frontier's Responsible Investment Policy ("the Policy") sets out the way responsible investment is integrated into its investment research and advisory efforts.

Frontier has been working with our clients and the investment management community on integrating responsible investment considerations since the late 1990s. While our fundamental philosophy remains unchanged, our research approach has been continually evolving as our clients and the funds management industry develop and change the way that they address these factors.

All ideas, managers and/or investments must justify their place in a client's portfolio across risk, return and cost dimensions. Risk and opportunities come in various forms and need to be identified, assessed and managed. ESG risks and opportunities are no exception and as such, ESG assessment forms an integral part of our research and advice. We believe the identification and management of material ESG risks and opportunities will assist investors to achieve their long-term objectives.

Deep research adds value, drives innovation, confirms investment strategies and mitigates greenwashing. We use both quantitative tools and qualitative views to inform our ESG and broader research and advice and to add value for our clients. And of course, implementation matters.

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
- Attachment

Attachment

[File 1:Frontier Responsible Investment Policy 201907 FINAL.pdf](#)

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

SG 01.4

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

- Regular employee training on RI/ESG
 - Regular RI/ESG policy awareness building for employees
 - Establishment of policy review committee/team
 - Remuneration linked to achieving ESG objectives
 - Annual performance incentives
 - Other, specify (1)
 - Other, specify (2)
 - Other, specify (3)
- No

SG 02

Mandatory

Public

Descriptive

SG 02.1

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

- UN Principles for Responsible Investment
- UN Global Compact Principles
- UN Guiding Principles on Business and Human Rights
- Universal Declaration of Human Rights
- UN Sustainable Development Goals
- International Bill of Human Rights
- International Labour Organisation Conventions
- IFC Performance Standards
- United Nations Convention Against Corruption
- OECD Principles of Corporate Governance
- OECD Guidelines for Multinational Enterprises
- GRI standards
- Other, specify (1)
 The Paris Pledge
- Other, specify (2)
- Other, specify (3)
- None of the above

SG 02.2

Additional information. [OPTIONAL]

At the time of writing, Frontier Advisors is developing its approach to assisting clients with respect to the Australian Modern Slavery Act 2018 which was passed by the Australian Parliament in early 2019. Frontier has been guided by several frameworks/guidelines beyond the human rights frameworks already noted. These have included guidance documents and other resources produced by the Global Slavery Index, the Australian Council of Superannuation Investors (ACSI), and the Responsible Investment Association of Australia's Human Rights Working Group.

SG 03**Mandatory****Public****Descriptive****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 type="checkbox"/>
Securities lending policy	<input type="checkbox"/>	<input type="checkbox"/>
Other, please specify (1)	<input type="checkbox"/>	<input type="checkbox"/>
Other, please specify (2)	<input type="checkbox"/>	<input type="checkbox"/>
Other, please specify (3)	<input type="checkbox"/>	<input type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>

SG 03.2

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

Frontier works closely with its clients when assisting them to develop and enhance their RI-related policies.

Led by Principal Consultant, Natasha Kronouer, our Governance Advice, Risk, Decisions and Strategy (GARDS) specialist team provides bespoke advice and research on business strategy, investment governance and decision-making structures, in-housing and insourcing, and risk reporting frameworks.

In conjunction with our Responsible Investment Group, GARDS provides assistance in achieving clarity on the client's responsible investment beliefs and philosophy along with tailored design of RI-related policies. Typically, this involves a multi-staged process starting with a comprehensive survey of key stakeholders focusing particularly RI beliefs and identifying areas of agreement and disagreement. The next phase includes a workshop for stakeholders and moderated by Frontier, at which all parties discuss and agree priority elements of RI beliefs and philosophy. Based on these outcomes, Frontier and the client work closely to develop and/or enhance an RI Policy.

At the client's request, the GARDS team will provide periodic reviews of the RI Policy in order to ensure it aligns with the client's current needs and prevailing RI thinking.

SG 04	Mandatory	Public	Descriptive
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SG 04.1	Briefly describe how you include ESG/RI factors as part of your business offerings.
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Business area

	Investment Consultancy
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	How you include ESG/RI factors
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Frontier's Responsible Investment Group was established in 2017 to assist with the delivery of one of Frontier's Major Projects for 2017 related to ESG, managed within Frontier' Investment Committee. The Responsible Investment Group was subsequently established as a permanent business unit in 2018. At the delegation of the Investment Committee, the Responsible Investment Group is responsible for thought leadership in, and oversight of Frontier's efforts on responsible investment.

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.
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Roles present in your organisation	Oversight/accountability for ESG/RI	Implementation of ESG/RI
Board	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Directors	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chief Executive Officer (CEO), Chief Financial Officer (CFO)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chief Operating Officer (COO), Chief Information Officer (CIO)	<input type="checkbox"/>	<input type="checkbox"/>
Other chief-level staff	<input checked="" type="checkbox"/> <div style="background-color: #0070C0; color: white; padding: 2px; text-align: center;">Please specify</div> Director of Consulting, Director of Research and Director of Investment Strategy	<input checked="" type="checkbox"/> <div style="background-color: #0070C0; color: white; padding: 2px; text-align: center;">Please specify</div> The Directors of Consulting, Research and Investment Strategy are all voting members of the Responsible Investment Group
Other heads of department	<input type="checkbox"/>	<input checked="" type="checkbox"/> <div style="background-color: #0070C0; color: white; padding: 2px; text-align: center;">Please specify</div> Chair of the Responsible Investment Group
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)

Frontier's regular internal program of ESG training (available to all employees) often features external ESG/RI specialists provided by fund managers, advocacy groups etc.

- 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.

The Chair of the Responsible Investment Group has a proportion of their financial incentives explicitly linked to meeting Objectives and Targets established annually for the Responsible Investment Group by the Investment Committee. These Objectives and Targets include measures based on quality, idea generation, revenues, research and efficiency and internal communications. One Investment Associate with specific RI responsibilities also has a proportion of their financial incentives linked to their performance on RI research.

Given responsible investment activities are fully-integrated into Frontier's activities, all research and client consulting staff are indirectly incentivised on the quality of ESG integration as part of their overall incentive structures.

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

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.

ESG/RI training is typically provided to clients on request and delivered by members of the Responsible Investment Group and/or Governance, Advice, Risk, Decisions and Strategy team.

The format of ESG/RI training provided by Frontier will depend on the client's specific needs but may include formal presentations and/or roundtable discussions.

Content of ESG/RI training provided by Frontier will also depend on the client's specific needs. Previous training sessions for clients have focused on a range of topics including management of climate-related risks and opportunities, fossil fuel divestment and the Australian Modern Slavery Act 2018.

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

Frontier may, in the course of providing ESG/RI training to clients, make them aware of various other related tools and or services which may assist them in incorporation of ESG factors in their investment strategy. Examples may include Frontier's climate change scenario module or modern slavery portfolio mapping tool (in development).

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

Frontier became a signatory of the PRI in October 2006 as a professional service partner. While not a steward or manager of assets, on becoming a signatory, Frontier has publicly committed to providing, developing and promoting services that support its clients' implementation of the Principles.

In signing the PRI, Frontier has also committed to engaging with investment managers and related service providers to further consider ESG issues in the management of monies on behalf of our clients, consistent with their fiduciary duties.

Principle 1:

Frontier works with clients to understand and clarify their ESG investment beliefs and objectives. This defines matters that are most important for the client and assists with the development of the client's investment philosophy and strategic asset allocation.

In designing an overall investment strategy the sensitivity to climate change risks are examined along with other risk factors.

We incorporate ESG considerations into our manager selection and manager monitoring process. A fund manager's approach to ESG forms a significant part of our due diligence both at the time of initial manager assessment, and as part of an ongoing review.

Principle 2:

Frontier regularly engages with fund managers to ensure active ownership policies are in place and as part of our regular monitoring of these managers we assess whether their active ownership practises are in line with their stated policies.

Principle 3:

As part of our regular monitoring of managers, we regularly request disclosure by managers with respect to their ESG practices. Frontier also engages with investment managers with respect to the enhancement of their ongoing ESG reporting to investors, particularly with respect to ESG metrics and data that is most commonly sought by our clients.

Principle 4:

For Frontier clients considering becoming PRI signatories, we have provided details with respect to the requirements of the PRI, as well as outlining the key benefits of becoming a signatory. Frontier also engages with investment managers that are yet to become signatories in order to promote the benefits of adopting the principles.

Principle 5:

Frontier regularly encourages investment managers and related service providers to further consider ESG issues in the management of monies on behalf of our clients where consistent with their fiduciary duties. One example relates to Frontier collaborating with the Clean Energy Finance Corporation with respect to decarbonisation targets as well as introducing the organisation to some of our clients who are PRI signatories.

Principle 6:

Frontier regularly undertakes and publishes research or written thought pieces across a range of ESG related topics. ESG/RI is a standing topic at our annual client conference with previous presentations and panels including topics such as climate change and modern slavery. Frontier is regularly invited to provide commentary on ESG/RI topics by reputable journalists and we seek to actively participate in report on progress made by the firm and by our clients.

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

SG 08.2

Additional information. [OPTIONAL]

Frontier is a member of the Global Investment Research Alliance (GIRA). GIRA is an innovative information sharing alliance between regional, like-minded and independent investment advisory firms. Frontier and Segal Marco Advisors are the foundation members, creating the Alliance in 2013, with UK-based firm, Lane, Clark and Peacock (LCP), joining in 2014.

GIRA provides each partner with access to an expanded manager research database, with all three databases accessible remotely and online. Regular contact between sector team counterparts, onsite meetings, joint manager meetings, research forums and joint venture research projects all contribute to enhanced global awareness and a sharing of ideas and concepts from a broad international pool of investment professionals.

Frontier has engaged with its GIRA partners on ESG matters in order to broaden its perspective on how ESG integration is considered in different global jurisdictions. Frontier believes these insights can provide useful context in providing RI advisory services to its clients (e.g. understanding regulatory developments in ESG outside Australia).

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.

Frontier has conducted detailed research into the demographics outlook for the globe and the potential impact on the economy, interest rates and investment returns. Our research included analysis of labour force participation, productivity growth, consumption, investment and savings patterns. The output of this research was factored into our long-term outlook for asset classes, which flows through to the advice we provide to clients as part of their investment policy and strategic asset allocation reviews.

 Climate change**SG 09.2**

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

Frontier has developed a Climate Change Module into Prism, within our proprietary portfolio analytics system. This is part of an ongoing objective to assist clients in considering environmental issues in their portfolio at the strategic asset allocation level. The Climate Change Module specifically aims to better understand the potential impacts of climate change on investment portfolios with regard to the return impacts of different but plausible scenarios.

We are continually in the process of reviewing our climate change modelling to take into account more recent changes in the relative cost profile of renewable energy and updated estimates with respect to the potential physical impacts of climate change. We also are continually refining the outputs of the modelling to make these more functional for clients. In this endeavour, we are particularly mindful of regulatory guidance which is growing in stature in Australia and ensuring that the modelling is consistent with such guidance e.g. alignment with TCFD.

Most recently, Frontier has looked to explicitly factor in long-term climate physical and mitigation dynamics into its determination of long-term expected asset class returns. In mid 2019, this process resulted in our long-term expected return for Australian cash (risk-free) being reduced by almost 0.25% p.a. This decision impacted our long-term return expectations for all asset classes as we employ a "building blocks" approach to capital market assumptions, the common base of which is the cash return. This represented a strong signal to clients that Frontier's sees climate change as a material and present impact on portfolios over the long term, even under a base case scenario.

- Resource scarcity
- Technology developments
- Other, specify (1)

Inequality

SG 09.2

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

Frontier has conducted in-depth research into the potential impacts of global dynamics around inequality on long-term economic growth and therefore, asset class returns. Frontier views inequality as a drag on sustainable economic growth. Along with the long term impact of climate change, inequality was a contributing factor to Frontier's decision to reduce our long-term expected return for Australian cash in 2019.

- 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)
- Other, specify (2)
- Other, specify (3)
- No, we do not

SG 10.3	Additional information. [OPTIONAL]
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In our meetings with our clients, we provide all areas of investment advice and support, and as required, this includes ESG/RI advice and implementation.

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

Frontier's focus is the provision of investment and related advice and research. This, along with our commitment to independence, defines what we do. We work as a team in partnership with our clients, pioneering creative business and investment solutions, which have regard for ESG/RI given that the identification and management of ESG risks and opportunities can assist investors to achieve their long-term goals.

Frontier's ESG/RI beliefs and philosophy are described in our publicly-available RI Policy. Given the large number and wide variety of ESG factors however, the formulation of Frontier's responsible investment research agenda also considers the materiality of these factors. ESG factors expected to have a material impact on the long-term performance of client portfolios are prioritised for research. Materiality in this context may variously refer to the expected scale of risk and/or opportunity, the prevalence of an ESG factor within the economy, and/or the degree to which Frontier assesses an ESG factor can reasonably be managed by clients.
- 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

Frontier recognises there is no "one size fits all" approach for ESG, with there being diversity in the ESG philosophy and level of specialisation of investors. This need to tailor responsible investment advice is one of Frontier's foundational responsible investment beliefs. Frontier's approach is always to work closely with clients to understand and clarify their ESG investment beliefs and objectives to ensure advice will be provided which is appropriate to a client's unique set of objectives, constraints and values. Frontier prides itself on providing frank and fearless advice and may, if circumstances dictate, recommend against intended courses of action relating to responsible investment by the client if we deem these to compromise the long-term sustainability of investment performance.

 This is not relevant for my organisation**SG 12.2**

Additional information. [OPTIONAL]

The most frequently encountered example we have observed to date where our preferred approach has been problematic for clients is with respect to the treatment of fossil fuel exposure in portfolios and managing the risks of these exposures (e.g. stranded asset risk). As a house, Frontier's view is that divestment of securities issued by companies with meaningful fossil fuel-derived revenues should be a last resort. We have a preference for active ownership where feasible, in order to drive positive change at a company level, and ultimately reduce emissions from fossil fuel use. However, in some cases, our clients will face certain limitations and/or specific stakeholder needs/preferences under which engagement is not readily feasible. In such circumstances, Frontier has continued to put forward its view but acknowledge for practical reasons, that divestment will be a preferred approach. We then work with clients to develop its strategy in order to effect a divestment approach which meets its needs.

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.

Frontier has established a Client Relationship Management (CRM) committee, from which members meet with clients on more formal basis to receive feedback on all aspects on our services, which includes and ESG/RI advice provided. Typically, such feedback is directed to the Responsible Investment Group to ensure that feedback which may be relevant to Frontier's broader client base may be efficiently addressed as part of the Group's role in driving overall responsible investment activity at Frontier.

Additionally, Frontier client teams frequently meet with internal client staff where regular feedback on our advice and services are regularly provided. Any feedback from our clients is used to improve the advice and services we provide to our client base.

Frontier is currently responding to client feedback in a number of areas with the most noteworthy being an evolution of our process to assess the RI credentials of investment managers. While this has long been a formal component of Frontier's investment product rating and monitoring process, client feedback indicated that consideration of a broader range of RI capabilities, and greater consistency of output across products was highly desirable. As such, the Responsible Investment Group, along with Frontier's Research Teams, are in the process of developing a more robust, transparent and structured ESG assessment framework which is expected to be in use before the end of 2020.

No

SG 14	Mandatory	Public	Descriptive
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SG 14.1	Indicate whether your organisation has a policy for managing potential conflicts of interest.
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Yes

SG 14.2	Describe how you manage potential conflicts of interest.
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Frontier's Conflict of Interest Policy sets out the framework for monitoring and managing conflicts of interest within the business. This includes procedures for ensuring client sensitive or privileged information is kept confidential within the relevant teams, including the process for quarantining electronic and other information received from, or known about, a client and their activities. Frontier will not act or advise on both sides of a transaction, nor will it advise a client where a promoter is on both sides of a transaction or proposal due to the inability to fairly and transparently verify a market price and the obvious conflict of the third party promoter.

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.
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Frontier sometimes receives information which, if disclosed, might materially affect the price or value of Financial Products. This is "inside information". The general principle of Frontier's Conflicts of Interests Policy is that employees are prohibited from dealing in any Financial Products in relation to which Frontier holds inside information. Further, employees have an additional specific restriction in relation to their superannuation and pension accounts such that, where the employees' pension fund is also a Frontier client, then switching is only permitted within 30 days of the fund's notification of its annual/six monthly reports except with the prior approval.

No

Frontier Advisors

Reported Information

Public version

Investment Consultancy

PRI disclaimer

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

Investment Consultancy

IC 01

Mandatory

Public

Gateway

IC 01.1

Indicate whether your services include any of the following.

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

Governance Advice, Risk, Decisions and Strategy team provides bespoke advice on business strategy, investment governance and decision-making structures, in-housing/in-sourcing, risk reporting

- Other, specify (2)

Member Solutions Group assists superannuation clients with post-retirement solutions - analysis and advice around member behaviour, demographic forecasting, product innovation and design, member communications

IC 01.2

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

Frontier enters into a service agreement with each of its clients, which clearly outlines the services to be undertaken, with the agreed fee outlined in the contract. Any out of contract services to be provided will be discussed with the client ahead of the work being completed, with the scope of the work and fees to be charged outlined separately.

IC 03

Mandatory

Public

IC 03.1

Indicate whether you provide fiduciary management services.

- Yes, we do
- No, we do not

Investment policy development

IC 06

Mandatory

Public

Descriptive

IC 06.1

Indicate whether you incorporate ESG into your investment policy development services.

- Yes, we systematically do
- Yes, we occasionally do
- No, we do not. Plans exist to start incorporating ESG into our investment policy development services in the next reporting year
- No, we do not

IC 06.2

Describe how you incorporate ESG factors and RI-considerations when advising clients on investment policy development.

- Reviewing clients' existing beliefs, investment strategy and policy in relation to ESG
- Aligning the investment policy with the client's overall ESG strategy and beliefs
- Helping clients define ESG investment objectives and incorporating them into policies
- Considering short-, mid- and long term time horizon of overall ESG objectives outlined in the investment policy
- Aligning the policy with the relevant ESG/RI regulations and public policies
- Determining the client's ESG risk-profile and materiality to inform the investment policy
- Providing education/training and case studies if the client has not publicly committed to an ESG strategy or beliefs, and seek to incorporate ESG in the client's investment policy
- Researching ESG trends, terminology and current debate to help create an up-to-date investment policy
- Comparing ESG investment policies of peers in the market
- Engaging the client organisations' executives, Board and any other stakeholders in the ESG investment policy development
- Outlining the internal governance structure responsible for overseeing and implementing the investment policy
- Other, specify (1)
 - Periodically reviewing a client's RI Policy and recommending amendments to maintain alignment with the client's internal investment policy and industry trends
- Other, specify (2)
- Other, specify (3)

Strategic asset allocation

IC 07**Mandatory****Public****Descriptive****IC 07.1**

Indicate whether you incorporate ESG into your strategic asset allocation process.

- Yes, we systematically do
- Yes, we occasionally do
- No, we do not. Plans exist to start incorporating ESG into our strategic asset allocation services in the next reporting year
- No, we do not

IC 07.2

Indicate how you incorporate ESG into your strategic asset allocation services.

- Incorporating climate change-specific factors into analysis of expected returns and risk levels across asset classes
- Incorporating other environmental considerations into analysis of long-term expected returns and risk levels across asset classes e.g. biodiversity, water usage, waste and hazardous materials
- Incorporating social considerations into analysis of long-term expected returns and risk levels across asset classes
- Incorporating governance considerations into analysis of long-term expected returns and risk levels across asset classes
- Incorporating ESG when advising on target percentages for allocation in asset classes
- Aligning the strategic asset allocation with the client's ESG investment policy, ESG investment objectives and ESG risk profile
- Other, specify(1)
- Other, specify(2)
- Other, specify(3)

IC 07.4

Additional information. [OPTIONAL]

Frontier's Capital Markets and Asset Allocation Team (CMAAT) integrates ESG considerations into the development of its long-term capital market assumptions on an annual basis. The CMAAT draws on ESG research from across the broader business including Frontier's sector Research Teams. ESG factors deemed material (e.g. transition to a lower-carbon economy), are considered alongside traditional factors, (e.g. productivity growth), in determining the long-term expected returns, risk, correlations etc. of major asset classes. These metrics are key inputs into portfolio modelling which is an important tool in determining a client's strategic asset allocation.

IC 09**Mandatory****Public****IC 09.1**

Describe how you measure, track or otherwise demonstrate your value on asset allocation activities.

Frontier maintains an internal Model Portfolio with a long-term horizon which is expected to meet an illustrative return target in keeping with that of a typical client (that maintains an investment objective of a hurdle over inflation). Frontier's Capital Markets and Asset Allocation Team (CMAAT) maintains a register of changes it makes to both strategic and dynamic allocations (medium term, circa one-to-three years) within the Model Portfolio framework. The value-add of dynamic asset allocation calls are reported to and formally reviewed by Frontier's Investment Committee on a periodic basis.

The performance of our clients is monitored carefully and, acknowledging that asset allocation is a key determinant of long term performance, the returns of the Frontier median client is periodically benchmarked relative to well-known peer universes, most commonly, the SuperRatings Balanced Fund universe. The relative performance of the Frontier median client is an input into Frontier's internal corporate scorecard, which subsequently is an input into the remuneration of Frontier personnel.

IC 09.2

Additional information. [OPTIONAL]

Frontier acknowledges that measurement and determining the success of an asset allocation advisory service goes beyond the return of a client's portfolio. An appropriate risk profile, exceptional client servicing and value-for-money considerations are some of the other crucial elements which we continually seek to deliver for our clients. While difficult to capture in a single measure, we do monitor the results of the annual Peter Lee Associates survey of institutional investors to understand how well our broader asset allocation advice is regarded across the industry. The top line results of the Peter Lee Associates survey are an input into Frontier's internal corporate scorecard, which subsequently is an input into the remuneration of Frontier personnel.

Investment research**IC 10****Mandatory****Public****IC 10.1**

Indicate whether you incorporate ESG into your investment research services.

- Yes, we systematically do
- Yes, we occasionally do
- No, we do not. Plans exist to start incorporating ESG into our investment research services in the next reporting year
- No, we do not

IC 10.2

Indicate whether the following activities are part of your investment research process. Describe for each activity how you incorporate ESG.

Investment research activities

- Asset level research

Describe how you incorporate ESG

On request, Frontier assists clients with investment research and due diligence on specific transactions, most typically in the real assets space, with respect to an infrastructure or property asset. In such circumstances, ESG factors are formally considered as part of Frontier's due diligence on the deal sponsor/fund manager. Please see further details on Frontier's approach to ESG/RI assessment of fund managers in section IC 12 - IC 19

- Portfolio level research
- Performance monitoring
- Mandate design

Describe how you incorporate ESG

On request, Frontier assists clients with the design of investment mandates which may include ESG/RI factors such as (but not limited to) minimum standards on ESG integration and reporting, selection of climate-aligned benchmarks or carbon intensity objectives. Frontier will engage directly with the client to articulate such requirements in line with its specific needs.

- Benchmark selection

Describe how you incorporate ESG

On request, Frontier assists clients with the selection of ESG/RI-aware benchmarks. In 2020, Frontier completed a research/information paper on the topic of climate-aligned passive equity indices. A key thesis was that investors should clearly articulate their specific objectives around climate before identifying an index against which a manager can construct its portfolio.

- Equity research
- Credit research
- Quant research
- Sector research

Describe how you incorporate ESG

Responsible investment research is primarily undertaken by Frontier's Research Teams, reflecting the domain expertise required to effectively analyse ESG factors within specific asset classes/capital markets. A Research Team may collaborate on responsible investment research with other business units including but not limited to, other Research Teams, the Responsible Investment Group, Client Teams and the Governance Advice, Risk, Decisions and Strategy Team, on an as-needs basis. Where relevant, a Research Team may draw on externally-produced responsible investment intelligence to supplement its proprietary analysis.

Each Research Team formally reports on material responsible investment matters across all major asset classes/capital markets on at least an annual basis. More generally, where deemed material, asset class/capital markets research reports will include consideration and analysis of relevant responsible investment issues.

- Thematic research

Describe how you incorporate ESG

At the delegation of Frontier's Investment Committee, the Responsible Investment Group has primary responsibility to formulate and drive the responsible investment research agenda. This process is continually informed by Frontier's interactions on responsible investment issues with a broad range of industry stakeholders including clients, investment managers and responsible investment advocacy groups.

Given the large number and wide variety of ESG factors, the formulation of Frontier's responsible investment research agenda also considers the materiality of these factors. ESG factors expected to have a material impact on the long-term performance of client portfolios are prioritised for research.

Materiality in this context may variously refer to the expected scale of risk and/or opportunity, the prevalence of an ESG factor within the economy, and/or the degree to which Frontier assesses an ESG factor can reasonably be managed by clients.

Frontier is further directed by the UN Sustainable Development Goals which in aggregate are viewed as providing tangible and detailed guidance on the likely evolution of development-related policies and capital funding requirements to achieve them. Frontier focuses on those goals which it believes it can have a material influence on behalf of clients at a given time.

For the 2020 calendar year, Frontier will aim to further its ongoing, longer-term thematic research relating to climate change and modern slavery. We have also identified a number of standalone thematic research topics for which the Research Teams will produce papers including the portfolio implementation considerations when divesting fossil fuels; private market opportunities in climate adaptation strategies; the investment thesis for specialist disability accommodation; the role of private capital in the just transition; and ESG-aligned corporate incentives - concept versus reality.

- Other, specify (1)
- Other, specify (2)
- Other, specify (3)
- None of the above

IC 11	Mandatory	Public	Descriptive
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IC 11.1	Describe how you measure, track or otherwise demonstrate your value on investment research activities.
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The measurement and tracking of Frontier's research value-add incorporates both internal monitoring and governance processes, as well as sourcing data/feedback externally from clients and industry benchmarking surveys.

IC 11.2	Additional information. [OPTIONAL]
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Frontier's internal monitoring and governance processes permit the measurement and tracking of Frontier's value-add in areas of research where quantitative data is readily available. These would typically include Frontier's dynamic asset allocation positions (versus an internal long-term Model Portfolio), and the relative performance of Frontier's highly-rated investment managers relative to peers and relevant indices.

Frontier also relies heavily on feedback from its clients via regular, informal interactions, as well as via a formal Client Relationship Management process. Such feedback is reviewed on an ongoing basis by Frontier's senior management, forming a key input into improving its overall research services.

Formal industry benchmarking surveys also provide Frontier with valuable intelligence with respect to the value-add it provides to clients. The most prominent of these is the Peter Lee Associates annual Investment Management survey which seeks the opinions on asset consultants from over 100 institutional investors.

Manager selection and monitoring

IC 12	Mandatory	Public	Gateway
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IC 12.1	Indicate whether you incorporate ESG factors into your manager selection and monitoring services.
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	Manager selection service
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- Yes, we systematically do
- Yes, we occasionally do
- No, we do not. Plans exist to start incorporating ESG into our manager selection services in the next reporting year
- No, we do not

Manager monitoring service

- Yes, we systematically do
- Yes, we occasionally do
- No, we do not. Plans exist to start incorporating ESG into our manager monitoring services in the next reporting year
- No, we do not

IC 12.3

Additional information. [OPTIONAL]

Responsible investment considerations are formally integrated into Frontier's investment manager assessment, monitoring and engagement processes. The objective of integrating responsible investment in Frontier's investment manager research effort is to positively impact long-term investment outcomes by identifying, assessing and communicating the relative credibility and capabilities between investment products with respect to ESG. Manager research is primarily undertaken by Frontier's Research Teams as the materiality of ESG factors will differ across asset classes and types of investment product. Where relevant, a Research Team may draw on externally-produced responsible investment intelligence to supplement its proprietary analysis. Under Frontier's current process, each product is assigned one, three or five stars which communicates the Research Team's summary view on the investment manager's capability in responsible investment relative to its peers.

The number of stars assigned correspond to the following definitions:

- One Star: no or very weak ESG consideration in the investment process.
- Three Stars: ESG considerations are broadly in line with peers.
- Five Stars: the manager is above peers in considering ESG in its investment process.

Responsible investment considerations are formally incorporated into annual reviews of investment products. The objective is to review, update (as required) and/or re-confirm the Research Team's current assessment of the investment manager's responsible investment capability with respect to the product. A focus of the review is to document the evolution of the investment manager's responsible investment approach over the prior 12 months. The review also accounts for the evolution of responsible investment integration in the product's peer group over the same period to determine the Manager's relative level.

Responsible investment considerations are also integrated and recorded where relevant within investment manager interactions outside the formal annual review cycle, e.g. update meetings, ESG surveys.

Research Teams actively engage with investment managers on an ongoing basis to encourage improvement across all facets of their operations. This formally includes the integration of responsible investment considerations. The objective is to have investment managers continually deliver progressively better services to Frontier's clients over time.

As part of the ongoing monitoring of investment products, the Research Teams document their responsible investment engagement activities over time. The relative progress of such engagement activities for a given investment manager compared to peers may ultimately impact the number of stars a product is assigned for its responsible investment capabilities.

Frontier is currently in the process of developing a more robust, transparent and structured ESG assessment framework which is expected to be in use before the end of 2020.

SELECTION

IC 13

Mandatory

Public

IC 13.1

Indicate what activities you undertake during the process of selecting a manager.

Research and screening

- Conducting ESG due diligence
- Developing guidelines and/or RI priorities for the selection process
- Conducting internal database screening that includes ESG factors
- Conducting external database screening that includes ESG factors
- Qualitative research that includes ESG factors
- Conducting ESG risk analysis
- Other (1), specify
- None of the above

Strategy

- Assessing the time horizon of the manager's offering vs. your client's requirements
- Assessing the quality of the manager's investment policy and its reference to ESG
- Assessing the investment approach of the manager and how ESG factors are incorporated
- Reviewing active ownership capabilities and track record of potential shortlisted managers
- Other, specify (1)
- None of the above

ESG people/oversight

- Assessing the ESG expertise of investment teams
- Reviewing the oversight and responsibilities of ESG implementation
- Other, specify (1)
- None of the above

Process/portfolio construction

- Reviewing how ESG materiality is evaluated by managers
- Reviewing the manager's use of ESG information in the investment decision-making process
- Review the impact of ESG analysis on investment decisions by the manager
- Review the manager's ESG risk framework
- Other, specify (1)
- None of the above

Selection process and reviewing documentation

- Reviewing ESG/RI responses to request for proposals
- Reviewing PRI Transparency Reports of the potential manager
- Request and discuss PRI Assessment Reports of the potential manager
- Reviewing potential manager’s assurance process on ESG/RI data and processes
- Meetings/calls with potential shortlisted investment managers covering ESG/RI themes
- Site visits to potential managers’ offices
- Other, specify (1)
- None of the above

IC 13.2 Indicate whether you use any of the following scores or targets in your manager selection process.

- ESG score
- ESG weight
- Real economy targets
- Other RI considerations
- None of the above

IC 13.3 Additional information. [OPTIONAL]

IC 14	Mandatory	Public	Descriptive
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IC 14.1 Describe how you incorporate asset owners` investment principles into the manager selection process.

Given that the responsible investment beliefs and principles of our clients differ, our advice with respect to manager selection will be tailored accordingly. For instance, for clients wishing to exclude particular investments/sectors, we will work with them in identifying the most suitable manager that can apply the relevant exclusion list.

Once the key ESG/RI characteristics are determined with the client, we seek to identify potential managers. Naturally, ESG/RI capabilities only form part of the rationale for appointing a fund manager and Frontier assists each client by undertaking due diligence across the full spectrum of such considerations including business structure and ownership; team strength; performance track record; investment process and fees amongst others. It is key that the fund manager ultimately appointed is determined as being able to meet all objectives, be they return/risk outcomes, ESG/RI objectives or even impact. Our experience is that ESG/RI as a consideration for investor Trustees is quickly sidelined should a fund manager be underperforming versus its return/risk objectives.

IC 15	Mandatory	Public	Descriptive
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IC 15.1

Briefly describe how you include ESG factors in your due diligence process for manager selection.

Consistent with Frontier's broader investment product rating process, the responsible investment assessment process is multi-faceted, drawing on a range of quantitative and qualitative inputs determined as being material by the relevant Research Team. Such inputs are sourced variously as needed, although direct discussions and case studies with the investment manager are a standing element of the process as these support a greater depth of understanding relative to sole reliance on manager-supplied documentation.

The required commentary to be provided in support of the number of stars assigned, is incorporated as a boilerplate in Frontier's product ratings template to ensure consistency in coverage across research teams. The number of stars assigned and supporting commentary are reviewed, updated and confirmed as part of a periodic refreshing of the ratings document.

Typical areas of assessment include the following, with individual Research Teams determining the materiality of each with respect to the specific product. Emphasis is placed more on the appropriateness and suitability of the investment manager's responsible investment approach in the context of its overall strategy rather than on strict and potentially arbitrary metrics. Research Teams also integrate asset class/product-specific responsible investment considerations where deemed material.

Responsible Investment/ESG Philosophy and Policy
 Responsible Investment Resourcing
 Integration of Responsible Investment into the Investment Process
 Active Ownership
 Collective Activity
 Climate Change
 Reporting and Client Service

IC 15.2

Additional information. [OPTIONAL]

The following is a (non-exhaustive) list of Frontier's areas of assessment with respect to the responsible investment capabilities of investment managers. Not all will be applicable for all products.

Responsible Investment/ESG Philosophy, Policy and Culture

- Evolution and articulation of responsible investment beliefs and/or philosophy
- Evidence and composition of a formal responsible investment policy
- Evidence and nature of a responsible investment culture
- Expected future responsible investment developments/strategies
- Internal responsible investment governance, leadership and reporting structure

Responsible Investment Resourcing

- Responsible investment roles and responsibilities
- Experience and skill of responsible investment personnel
- Evolution and composition of internal responsible investment resourcing
- Alignment structures relating to responsible investment objectives
- Level of collaboration across investment personnel and ESG personnel
- External responsible investment resourcing
- Procurement and use of responsible investment data sources

Integration of Responsible Investment into the Investment Process

- Articulation of responsible investment rationale and objectives
- Processes to determine ESG factor materiality
- Evolution and nature of responsible investment integration (as applicable) in:
 1. Idea sourcing and generation
 2. Research, analysis and valuation
 3. Decision making

4. Investment execution
5. Portfolio construction
6. Asset management
7. Risk management
8. Performance attribution
9. Other investment process steps as required
 - Adoption/use of existing responsible investment frameworks (e.g. Sustainable Development Goals, Sustainability Accounting Standards Board)
 - Expected future responsible investment process enhancements
 - Evidence of depth and consistency of responsible investment integration
 - Evidence of value add arising from responsible investment integration

Stewardship

- Articulation of engagement strategy
- Articulation of asset management strategy
- Composition of proxy voting policy
- Use of external proxy voting resources
- Articulation of approach to measure outcomes of stewardship activity

Collective Activity

- Evolution and articulation of collective activity approach
- Details of responsible investment-related memberships and/or affiliations
- Nature of main obligations as a member and/or affiliate
- Evidence of/examples illustrating nature of participation in collective activity
- Articulation of approach to measure outcomes of collective activity

Climate Change

- Articulation of climate strategy and policy
- Evolution and nature of climate integration in investment process steps
- Adoption of existing climate frameworks (e.g. Taskforce for Climate-related Financial Disclosures)

Reporting and Client Service

- Evolution of responsible investment reporting
- Evidence of/examples illustrating responsible investment reporting capabilities
- Capability and capacity to generate tailored responsible investment reports (e.g. impact)

IC 16	Mandatory	Public	Descriptive
IC 16.1	Indicate whether you set any of the following to measure compliance/progress, or use the following information to review and evaluate the investment manager.		

Setting measures for the investment manager as part of the monitoring process

- ESG score
- ESG weight
- Real economy targets
- Other RI considerations
- None of the above

Reviewing and evaluating information from the investment manager as part of the monitoring process

- ESG objectives linked to investment strategy
- Investment restrictions and any controversial investment decisions
- ESG incorporation objectives
- ESG portfolio characteristics
- How ESG materiality has been evaluated by the manager in the monitored period
- Information on any ESG incidents
- Metrics on the real economy influence of the investments
- PRI Transparency Reports
- PRI Assessment Reports
- Other general RI considerations in investment management agreements, specify
- None of the above

IC 16.2

Describe how you raise and manage concerns when monitoring investment managers on ESG factors.

Concerns with respect to an investment manager's ESG credentials and capabilities are raised directly with the manager as part of Frontier's standard process of providing feedback. In order to drive positive change at the fund manager level, Frontier aims to maintain open and transparent dialogue with managers across all facets of its due diligence including ESG/RI, which is in keeping with its status as a PRI signatory.

IC 16.3

Additional information. [OPTIONAL]

Research Teams actively engage with investment managers on an ongoing basis to encourage improvement across all facets of their operations. This formally includes the integration of responsible investment considerations. The objective is to have investment managers continually deliver progressively better services to Frontier's clients over time.

As part of the ongoing monitoring of investment products, Frontier's Research Teams document their responsible investment engagement activities over time. The relative progress of such engagement activities for a given investment manager compared to peers may ultimately impact the number of stars a product is assigned for its responsible investment capabilities.

In line with our evolving, more granular approach to investment manager ESG assessment, Frontier will increasingly be able to clearly articulate peer relativities on ESG capabilities through our dialogue with managers, identifying practices considered market-leading and commercially innovative. We believe that this feedback process will encourage managers to undertake their own reviews of best practice in the market and where aligned with their investment strategy adopt them, thereby raising standards across the industry.

IC 17	Mandatory	Public	Descriptive
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IC 17.1 Indicate whether you report back to asset owners on your manager selection and/or monitoring activities.

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

IC 17.2 If yes, describe how you report back and the frequency.

All contact with managers is documented, with clients having access to the meeting notes from the manager meetings. Managers are met with as part of the regular reporting requirements as set out in client contracts and we will also meet more frequently on an as needs basis. As part of the sector annual review process, separate manager reviews are also completed and provided to clients. The ESG ratings of managers are available on Frontier's database, to which all clients have access.

IC 17.4 Additional information. [OPTIONAL]

On an annual basis, Frontier's Research Teams survey and review fund managers on a range of ESG/RI factors including (but not limited to) updated ESG integration approaches, considerations on climate risk and opportunities in their portfolios, and exposure to modern slavery in their portfolios.

IC 18	Mandatory	Public	Descriptive
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IC 18.1 Describe how you measure, track or otherwise demonstrate your value on manager selection and monitoring services.

Frontier measures the performance of our Buy and Neutral Plus managers across the various asset classes. We also monitor the performance of standard mandates relative to those with ESG exclusions.

Frontier Advisors

Reported Information

Public version

Confidence building measures

PRI disclaimer

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