



RI TRANSPARENCY REPORT

2020

EIRIS Foundation

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	🔒	n/a
AOS 12	Raising concerns with companies ahead of voting	🔒	n/a
AOS 13	Voting against management	🔒	n/a
AOS 14	Monitoring voting outcomes	🔒	n/a
AOS 15	Mechanisms for clients to review voting recommendations	🔒	n/a
AOS 16	Involvement in projects to improve voting trail and obtaining confirmation	🔒	n/a
AOS 17	Sharing ESG information on companies with clients	✓	Public
AOS End		✓	-

Investment Consultancy

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

Confidence building measures

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

EIRIS Foundation

Reported Information

Public version

Organisational Overview

PRI disclaimer

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

Basic Information

OO 01

Mandatory

Public

Descriptive

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

United Kingdom

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

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

OO 01.3 Indicate the regions where you have offices.

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

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

FTE

3

Reporting Year

OO 02

Mandatory

Public

Descriptive

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

31/12/2019

Signatory category and services

OO 03	Mandatory	Public	Gateway
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OO 03.1

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

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

OO 03.2

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

- Reporting
- Active Ownership Services

Active Ownership Services

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

OO 03.4

Additional information [OPTIONAL]

We offer advice to charities on developing responsible investment policies, which can include an element of active ownership. We also undertake projects funded by investors, charities or governments such as Your Ethical Money which combines data and research for the retail investor with advice on how they might approach responsible investment, and the Corporate Human Rights Benchmark and our Investment in Occupied Lands Project which combine the provision of accurate independent data with active ownership opportunities for investors and engagement with the companies identified by the projects.

OO 05	Mandatory to Report Voluntary to Disclose	Public	Gateway
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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> 5	<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> 85	<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

EIRIS Foundation

Reported Information

Public version

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.

Our philosophy

Our vision is a financial and corporate system that encourages sustainable and responsible wealth creation and management. Our mission is to use research, analysis and influence to identify gaps, barriers, opportunities and enablers so that we can help organizations and individuals maximise their contribution to the responsible business and investment agenda. So ESG factors are central to all that we do.

We undertake and publish research into responsible investment and the social and ethical aspects of businesses in the UK and overseas and how those may be relevant to investment policies and we assist other charities by providing information and advice to help them choose investments which do not conflict with their aims or otherwise hamper their work. We look at the integration of environmental, social and governance (ESG) factors into all forms of investment, engagement with companies relating to holdings of equities, bonds and other investments, thematic investment in areas like green bonds or "impact investing" in enterprises with social, environmental or ethical objectives as well as screening investment portfolios.

In carrying out this work we are guided by some operating principles:

1. Maintaining high standard of independence and rigour in our research with a focus upon the public interest
2. Acknowledging the different investors will take different approaches to responsible investment and seeing our role as being to facilitate each investor's ability to achieve their own objectives in this field through reliable independent information, choices as to how that might be applied to their circumstances, and helpful advice.
3. We will consult companies or investors who we research or work on (or a sample of them) and provide opportunities for review and further input before we publish information about them.

How this links with our business offering

We assist other charities with regards to responsible investment chiefly in two ways. The first approach is advice and assistance to charities in developing their own ethical or responsible investment policies. The Foundation's charitysri.org website also continues to provide a resource for charities to consider different ways of developing their own responsible investment policies (depending upon their objectives and circumstances) and we plan to maintain and develop this going forward.

The second approach is to help charities identify ways in which other responsible investors (whether larger institutions, or their own members and supporters) can advance the charity's objectives through the approach the investor's approach to responsible investment. This can include identifying the environmental social and governance issues investors may incorporate in their engagement and risk management approaches as well as investments and strategies that could advance the charity's objectives while assisting the investor in their pursuit of long term sustainable wealth creation.

The EIRIS Foundation, as well as being one of the founding partners of CHRB, co-ordinates the team of 12 researchers who produce the assessments and our CEO Peter Webster, also co-chairs the Methodology Committee.

As the team responsible for the research and the quality of the results, we have implemented a very thorough research approach to hunt down companies' public information and we have noticed that companies are disclosing more detailed and relevant information than we have seen in the past.

Over 2019 CHRB has benchmarked 200 companies in the Agriculture, Apparel, Extractives and ICT manufacturing on their human rights policies and performance. It uses publicly available information on issues such as forced labour, protecting human rights activists and the living wage to give companies a maximum possible score of up to 100%. In November 2019 an updated ranking was published using a revised methodology. Over the past three years, the project has seen the numbers of companies scoring in the 30-60% bands have doubled from 15 in 2017 to over 30 in 2019. Companies average scores have

also seen an improvement of 13% from 2017 to 2019, with companies' average scores increasing from 18% in 2017 to 31% in 2019.

On the basis of a grant from the Open Societies Foundation (OSF) the Foundation has continued to work upon the Investment in Occupied Lands project which undertook research on Companies operating in Crimea and the Occupied Palestinian Territories (West Bank and Gaza Strip) with the help of the team at EIRIS Conflict Risk Network who are expert in exploring business and human rights issues in particular countries. The www.businessinoccupiedlands.org database has continued to be updated and improved. We built on the work done on our paper 'Investor Responsibilities in Occupied Territories,' by continuing to consult with businesses and other stakeholders on this issue. We also held a workshop with a large corporation who sought some bespoke advice on their operations which provided us with further practical insights that we can use to develop the project further

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

<http://www.eirisfoundation.org/our-strategies/>

- Attachment
- 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 01.5

Additional information [OPTIONAL]

Our philosophy has been reviewed as part of the strategy creation process on our trustee board, and the board will review both the strategy itself and the contribution that each product or service we offer makes to that strategy at least annually.

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

SG 02.2

Additional information. [OPTIONAL]

We have answered this question in terms of the methodologies we have developed for our investment in occupied lands project and our contribution to the Corporate Human Rights Benchmark.

The EIRIS Foundation uses research, analysis and influence to identify gaps, barriers, opportunities and enablers so that we can help organizations and individuals maximise their contribution to the responsible

business and investment agenda. All of our work, whether our free resources or our revenue-generating activities and research, takes international standards into account.

SG 03	Mandatory	Public	Descriptive
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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 checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Sector-specific RI guidelines	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Screening/exclusions policy	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Engagement policy	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(Proxy) voting policy	<input type="checkbox"/>	<input type="checkbox"/>
RI guidelines set out within the Investment Policy Statement (IPS)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
RI guidelines set out in a freestanding RI policy	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Multi-year RI implementation project plan	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Conflict of interest management policy	<input type="checkbox"/>	<input type="checkbox"/>
Stockbroker allocation policy	<input type="checkbox"/>	<input type="checkbox"/>
Securities lending policy	<input type="checkbox"/>	<input type="checkbox"/>
Other, please specify (1)	<input type="checkbox"/>	<input type="checkbox"/>
Other, please specify (2)	<input type="checkbox"/>	<input type="checkbox"/>
Other, please specify (3)	<input type="checkbox"/>	<input type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>

SG 03.2

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

We have answered this question mainly in relation to how we might advise a charity who seeking to set up their responsible investment policy. These would almost always be "tailored", although we have also made available some analysis of the mutual funds available to charities each of which is "off-the-shelf". Our website for individual investors (Your Ethical Money) is more focused on analysing the off-the-shelf policies available from different providers in the UK retail market.

Through our free resources we encourage individual investors and charities (and other asset owners including private individuals) to explicitly consider ESG in their financial decisions.

Particularly in our work with charities we encourage them to consider a wide range of ESG factors when forming their investment policy. We advise them that the issues to consider will depend upon the values and work of their particular charity or organisation. This decision may also be influenced by their areas of expertise and the views of donors, supporters, staff and experts in these areas. We have an online "What's right for your charity?" tool that may help them to form thoughts around what these issues should be. These issues can form the basis of positive screening, negative screening or engagement approaches - or a combination of these.

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**

Our ownership services are not traditional ones - we don't give investors voting recommendations or provide similar services. As partners in the Corporate Human Rights Benchmark, we engaged with companies on behalf of the major investors who are backing the project financially and who also engage directly with the companies involved. This involves explaining the benchmark scores (and the rationale behind them) and answering questions about ways to do better. The benchmark explicitly aims to raise overall corporate performance in the field of human rights.

Our database of businesses in occupied lands (covering Crimea and Palestine) enables investors to find important information on where their investments might be at risk. We have produced a report to assist investors with regards to human rights due diligence entitled: Questions to help companies respect human rights in occupied territories

Our assistance to charities in developing their own responsible investment policies and in looking at ways they may wish to influence responsible investors to look at the issues central to their own mission will also focus on active ownership where appropriate.

Investment Consultancy

How you include ESG/RI factors

Our charity work is entirely focussed on helping them to incorporate ESG factors to their investment portfolios which aligns their investment activities with their missions. This decision may also be influenced by their areas of focus and the views of donors, supporters, staff and experts in these areas. These issues can form the basis of positive screening, negative screening or engagement approaches - or a combination of these.

Our advisory services to individuals (yourethicalmoney.org) provides the information needed for individuals to align their investments with their values.

Research and Data Provision

How you include ESG/RI factors

Since ESG is all we work on, all our research and data provisions are about ESG. Our current research projects focus on certain elements of ESG. So in the Corporate Human Rights Benchmark project, we research with the help of partners the human rights policies and behaviour of 100 leading companies - this is of course a key part of the Social facet of ESG. In the Investors in Occupied Lands project, we engage with investors on what due diligence should be for those who are invested in conflict zones. Our data base for UK retail investors (Your Ethical Money) is all about how ESG factors can be taken into account when investing in mutual funds, pensions, banks or insurance companies.

SG 04.2

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

Roles present in your organisation	Oversight/accountability for ESG/RI	Implementation of ESG/RI
Board	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Directors	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chief Executive Officer (CEO), Chief Financial Officer (CFO)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Chief Operating Officer (COO), Chief Information Officer (CIO)	<input type="checkbox"/>	<input type="checkbox"/>
Other chief-level staff	<input type="checkbox"/>	<input type="checkbox"/>
Other heads of department	<input type="checkbox"/>	<input type="checkbox"/>
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
- No
- Not applicable, we ensure that employees incorporate ESG/RI into services through other mechanisms.

SG 04.6 Describe how you ensure that your employees incorporate ESG/RI into services through other mechanisms than ESG/RI linked incentives.

All of our work centers around ESG/RI. It is at the core of all of our products and services and we ensure staff are aware of this through clear communication and staff engagement with regards to our overall objectives and strategy.

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

Percentage of service outsourced

- <10%
- 10-50%
- >50%
- Research and Data Provision

Percentage of service outsourced

- <10%
- 10-50%
- >50%
- None of the above

SG 05.2 For each business area, describe what components you outsource to other organisations.

Advisory and Consultancy:

We work in partnership with Vigeo-Eiris to provide ESG rating when required. The figure of aprox.10% is only indicative: some charities might have a large ESG data requirement, some none at all, depending upon their fund managers to obtain such data.

Research and data provision:

On the CHRB, we outsourced the detailed investigation of companies (mainly to Sitawi in Brazil and Ecodes in Spain plus the use of freelancers) and retained the project management, quality control and interaction with the researched companies.

On the Investment in Occupied Lands project, we have made use of the skills of the Vigeo Eiris Conflict Risk Network to conduct the detailed analysis of the companies involved.

SG 05.3

For each business area, describe how you ensure the organisation implementing your outsourced services adheres to your beliefs and policies on ESG/RI.

For the Corporate Human Rights Benchmark we work with the other project partners to define the methodology following extensive consultation with stakeholders and we have created the research manual and other methodology and research practice documentation and the accompanying database. The philosophy of the project accords with our overall philosophy and operating principles as set out in earlier sections and research providers work sign up to all of this as part of being involved with the project.

For the Investment in Occupied Lands project, the methodology and philosophy of the project remains firmly with the EIRIS Foundation and we discuss individual cases and the presentation of the data in some detail to make sure everything remains aligned with those principles.

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)
 - Charity and Foundation Staff**
 - Other, specify (2)
 - Individuals**
 - 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.

Our charitysri.org website provides free information and resources on Responsible Investment - what it is, reasons for doing it and how to go about it. Responsible Investment in this context is about aligning investments with mission and incorporating social, environmental and ethical issues into investments. We can provide tailored support to charities applying these principles and approaches to their individual circumstances. Our yourethicalmoney.org website provides objective, independent information on green and ethical finance to mainstream consumers. The website aims to: Encourage people to think about the wider impacts, both positive and negative, that their money, and how they bank and invest it, can have on society and the environment Empower consumers to help address key concerns such as climate change, poverty, human rights and sustainable development through their financial decision-making Contribute to the building of a sustainable financial sector Present information regarding alternative financial products, for example: ethical investment funds, green mortgages, child trust funds that invest responsibly Highlight the key issue of financial exclusion in the UK, a massive country-wide problem which is inextricably linked to poverty and social exclusion Offer resources such as take-away guides, letter templates, a database of independent financial advisors with ethical investment experience and contact details for relevant organisations, institutions and funds Be impartial and independent

SG 06.3

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

We have in the past and may in the future provide paid-for bespoke training/guidance to charities to assist them in formulating a RI investment policy.

SG 07**Mandatory****Public****Descriptive****SG 07.1**

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

Principle 1: We can help charities integrate ESG issues into their investment process, and the Corporate Human Rights Benchmark (CHRB) is being used by investors to integrate business and human rights issues to their investment processes while the Investment in Occupied Lands database does the same for these specific conflict issues. Your Ethical Money helps the UK retail investor integrate ESG consideration into their investment decisions.

Principle 2: We are carrying out engagement on behalf of the sponsors of the CHRB and encouraging others to do the same. With regards to our Investment in Occupied Lands (IiOL) project we have worked with investors to help them take up active ownership opportunities with regards to the application of human rights due diligence.

Principle 3: Both the CHRB and IiOL project are very focussed on public disclosure. The former insisting on public disclosure before analysing information from companies (and providing them with a specific "portal" to make further disclosures), and the latter being a vehicle to disclose accurate information about operations in disputed territories concerned. We also work to encourage charities to seek appropriate disclosure of ESG issues with regards to their investments.

Principle 4: We will take every opportunity to encourage charities to consider becoming signatories of the PRI in working with them and to consider using data from PRI in choosing their own fund managers as appropriate. We are also in the process of looking at whether PRI data on manager implementation of the PRI principles can help to assess engagement and integration in our work for retail investors.

Principle 5: Our CEO Peter Webster was previously on the PRI Board and continues to feed into various work stream. Our strategy on transformational engagement will develop ways of maximising the impact of principle 2, while our planned work on spreading best practice corporate responsibility will include disclosure as per principle 3.

Principle 6: This report is made in compliance with Principle 6, and we are making all relevant sections "public"

SG 07.2	Highlight whether there are any ways that your organisation would like to engage further with the PRI. [OPTIONAL]
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Specifically we still have plans to examine whether the PRI engagement platform might be an appropriate tool to encourage investors to encourage human rights due diligence in relation to occupied territories, and whether PRI data may help with the assessment to retail offerings in the UK. We also envisage potential co-operation around our strategies in the relation to spreading best practice corporate responsibility and assessing and encouraging transformation engagement where this aligns with investors' goals.

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]
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In the reporting period in particular, we have in mind consultations (jointly with other project partners) on the latest update in the Corporate Human Rights Benchmark methodology. We organised a roundtable to discuss various aspects of our work around businesses operating in conflict areas.

Our yourethicalmoney.org website and some aspects of charitysri.org (for example analysis of the mutual funds available to charities) also provide continuous encouragement to providers to disclose clearly what they offer to other parties in the investment chain.

SG 09	Mandatory	Public	Descriptive
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SG 09.1	Indicate which of the following long-term trends are addressed in your product outputs.
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- Changing demographics
- Climate change

SG 09.2

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

This is a significant issue for charities as perhaps the biggest issue that their supporters and other stakeholders are likely to raise with them (even if it is not directly part of their mission) as well as being a topic on which charities for whom climate change is part of their mission may seek our help working out how best to work with other responsible investors going forward.

Climate change is also one of the issues driving the belief amongst an increasing number of investors that new models are needed if investment performance is to be sustainable in the long-term, which is one of the inputs to our strategy overall.

- Resource scarcity

SG 09.2

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

There are a number of indicators in the Corporate Human Rights Benchmark which address issues around indigenous rights and the community impact of extractives operations which are all related to resource scarcity. Some of the due diligence issues that will arise in relation to companies identified by our Investment in Occupied Lands project are also related to the use of natural resources in disputed contexts.

More generally our whole strategy of seeking to move the business and investment world into models where successful long-term wealth generation can be sustainable and of benefit to all parties is given added urgency by many issues of resource scarcity.

- Technology developments

- Other, specify (1)

The development of new Business & Human Rights models

SG 09.2

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

The development of the UN Guiding Principles on Business and Human Rights is a long term trend in the understanding of the responsibilities of business and one of the necessary social aspects of long-term investment considerations, as evidenced by the number of investors supporting the Corporate Human Rights Benchmark and the UN Guiding Principles Reporting Framework. The UNGPs are central to the model of driving change adopted by CHRB, and we believe the due diligence framework advocated by the UNGPs for companies (and now by the OECD for investors) will also provide a model through which investors may be able to engage with companies operating disputed territories. Related to this we have continued to develop our work which started with our report in 2018 entitled: Questions to help companies respect human rights in occupied territories

- 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

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 July last year we held an educative event specifically for charity asset owners exploring numerous aspects of responsible investment.

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

Our vision speaks of creating a financial and corporate system that encourages sustainable and responsible wealth creation and management. This by definition mean that we strive to create a world where investors' goals and ESG are aligned, and in the meantime we work with those who already see value in using the various work we undertake.
- 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

We do not advice directly on what investors should do, we advise investors on how to deal with ESG issues generally taking into account their own best interest as nowadays understood by the developing concept of fiduciary duty where we particularly welcome the work PRI and others have done.

So we don't see it as our role to "campaign" for investors to do things that are bad for them, rather to help investors and the companies they invest in to identify ways in which ESG and their other goals can be aligned in pursuit of a more general transition to a sustainable economy.
- This is not relevant for my organisation

SG 13	Mandatory	Public	Descriptive
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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.
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We are constantly tailoring our activities (such as online resources and events as two examples) based on feedback we receive from 'clients' and other stakeholders. Both the Corporate Human Rights Benchmark and the Investment in Occupied Lands project have also engaged in consultation on the best way to advance their research methods and other offerings in the reporting period and we see this as crucial to maintaining the usefulness of both projects.

To be very practical, in the case of CHRB it has affected the indicators that we are using to measure companies progress, and in the case of liOL it has identified how the due diligence process might help investors address these issues, and the challenges that companies and investors will face in applying this approach which are informing our future guidance for them on these matters.

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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We have a process of identifying any conflicts on our trustee board with individual trustees standing aside from particular decisions as relevant (for example in the past this led us to exclude trustees who sat on advisory boards for retail ethical funds from being involved in signing off publications in relation to such funds) and we have considered the potential for conflicts of interest for specific projects as well (for example consideration of whether particular sources of funding might create unmanageable conflicts in relation to that project). Individuals facing any particular conflicts are expected to raise those with their line manager.

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.
---------	--

It is a condition of employment that all information and material used by employees in their work may be used solely for the purpose of fulfilling their responsibilities as an employee and not transmitted to anyone else or used for any other purpose. The importance of confidentiality around the launch of particular project updates or releases is emphasised case by case.

No

EIRIS Foundation

Reported Information

Public version

Active Ownership Services

PRI disclaimer

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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 02	Mandatory	Public	Descriptive
--------	-----------	--------	-------------

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.

For researching companies as part of the Corporate Human Rights Benchmark, we collate the information from all the above mentioned sources to assess the company's compliance with human rights standards (although primary data has to be published by the Company through the CHRB portal if it has not previously been made publicly available).

CHRB assesses serious allegations as well as Company policies, practices and other disclosures. This includes information from Reprisk, Vigeo Eiris and the Business and Human Rights Resource Centre.

All of this information is assessed to provide an initial Rating for the company who are then invited to engage with the project to clarify their score and decide whether to take further steps to enhance their business and human rights practices (including further disclosures) before their final score is calculated and they are ranked against the other 100 extractive, apparel or food and agriculture related companies in the benchmark.

Since the project is driven by an alliance of investors (Aviva, ABP and Nordea particularly, but also VBDO, as well as supported by a wider group of investors concerned about human rights) alongside the Institute for Human Rights and Business & the Business and Human Rights Resource Centre the companies concerned see this as an investor focussed initiative with civil society support.

A similar range of sources is used to draw together the data of companies operating in Crimea and

Palestine for our Investment in Occupied Lands project, which is now reaching out to investors to engage with companies to press for human rights due diligence processes to be applied to these investments.

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

AOS 03.2	Describe how you identify emerging ESG issues.
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The application of the UN Guiding Principles on Business and Human Rights to the challenges facing business in the human rights field is an increasing area of focus, and driving this forward through competitive forces and rankings has been the mission of the Corporate Human Rights Benchmark, for which we are providing the research and engagement work.

In relation to our project on Investment in Occupied Lands, this too is an emerging issue for a range of investors and the project has been financed by the Open Society Foundation to encourage consideration of the challenges involved and engage investors in that conversation by looking specifically at listed companies with links to either Crimea or Palestine.

In both these cases we have identified emerging issue through stakeholder engagement. In the CHRB case initially with over 400 organisations and individuals to produce the 2016 Pilot benchmark, and repeated further consultation in multiple locations around the world in 2017. In the case of the liOL project the engagement has been through a range of roundtables held in Geneva, London, New York and Boston in the autumn of 2017.

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

As well as a top level focus on the importance of business and human rights in general in the CHRB there are a range of specific emerging issues: payment of living wages; respect for human rights defenders; public commitment to remedy; disclosure of supply chains; and commitment to revenue transparency would be examples that have emerged from the stakeholder process.

In relation to occupied territories the emerging issue has been how investors can apply the new OECD 2017 guidance on due diligence to these particular circumstances, and the approach we are exploring is whether engaging with companies to encourage them to undertake human rights due diligence in relation to these territories would be the best way for investors to engage upon these issues.

No

Engagement

AOS 04	Mandatory	Public	Descriptive
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AOS 04.1	Describe how you select priority engagement topics to raise with companies and how you involve your clients in this process.
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Since we are a charity, we are governed by our mission. Therefore, our engagement topics derive from our strategies. Once our projects are defined, we choose the best approach which might include engagement.

In relation to the Corporate Human Rights Benchmark to engagement focusses on the scoring system which has been calibrated after extensive stakeholder feedback (described earlier) to identify those issues that mark out genuinely leading practice in the field of business and human rights for the highest scores.

AOS 04.2

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

This depends on the project we work on. On the Investment in Occupied Lands project, we defined our project in our funding proposal and have developed the specific milestones/objectives on engagement based on the project plan.

In relation to Corporate Human Rights Benchmark, the objectives are determined by the scoring methodology.

AOS 04.3

Additional information [OPTIONAL]

We are also in the process of launching a strategy that will examine what role "transformational engagement" can play in the transition to a global economy in which long term economic success can be sustainable. This will be not so much focussed on ourselves carrying our engagement ourselves, as identifying what engagements are already taking place and looking to understand what would drive a greater use of engagement in transforming the economy in general in the long term interest of investors and society at large.

AOS 05**Mandatory****Public****Descriptive****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

Visits to operations

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

Other (1), specify

Other (2), specify

Other (3), specify

AOS 05.2

Describe your typical execution method.

In the Investment in Occupied Lands project, every company receives all the details of any information we have identified in relation to investment Crimea or Palestine for the feedback and further information. We are still reviewing the best means to organise investor engagement with the companies identified in the

database.

In relation to the Corporate Human Rights Benchmark, all companies have received multiple communications by letter (about consultation, about publishing fresh information and about our conclusions), but they are then also offered an opportunity for an hour long phone call on a selection of issues of their choosing. In the Pilot Benchmark, more than 40% chose to participate in this engagement process with experts from the research team and the methodology committee or the CHRB project leader.

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
- 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
- Investor relations-teams
- Sustainability/CSR team members

Frequency

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

The objectives of the Corporate Human Rights Benchmark (to improve the practice of business and human rights amongst those companies most at risk by encouraging a race to the top in the long term

interests of investors as well as the companies stakeholders) are communicated very clearly by the project materials and documentation, and this has been repeated in the consultation phases of the project as well with companies and trade associations.

The rationale for investor engagement with business in occupied lands has developed some extent the materials presented at the recent tables, but will be developed further in the next phase of the project.

AOS 06.3	Describe the escalation strategies you take (or suggest that your clients take) when the engagement objectives are not achieved.
-----------------	--

Investors supporting CHRB have already contacted all companies to reinforce the messages communicated during the project consultation and engagement phases. Attention will be focused in future on the minority of companies who not engaged with the project at all including through giving wider publicity to this list.

In relation to Investment in Occupied Lands the escalation strategies are under review as part of the next phase of the project.

AOS 07	Mandatory	Public	Descriptive
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AOS 07.1	Indicate how you monitor the progress of engagements.
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- 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
- We do not provide clients with recommendations for next steps

AOS 08	Mandatory	Public	Descriptive
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AOS 08.1	Describe how you define success when evaluating/reviewing engagements on ESG factors.
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This is done case by case. In the Investment in Occupied Lands project, we view success as the database being used by investors to confirm their exposure to either Crimea or Palestine markets and pursuing their own strategies in relation to those exposures, including potentially asking the companies to conduct human rights due diligence in relation to those operations.

For the Corporate Human Rights Benchmark the objective is clearly that companies develop their approach to business and human rights so that many more of them get good scores in the benchmark, which is entirely transparent and publicly available.

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

This depends on the project. In the above mentioned project, we measure our success by gathering evidence that the database is being used and consulting by investors. For CHRB the evolution of the scores will be a key public measure of the success of the project.

AOS 09	Voluntary	Public	Descriptive
---------------	------------------	---------------	--------------------

AOS 09.1 Indicate the number of companies with which you engaged during the reporting year.

450

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
 No

AOS 09.4 Additional information. [OPTIONAL]

Engagement by letter was carried out with 250 companies in Crimea or Palestine, and with 200 companies in the Corporate Human Rights Benchmark. Over 40 CHRB cases chose to have an hour long engagement call.

The tracking on impact can be seen in the changing results over time of the companies ranked by CHRB. On the past three years, the project has seen the numbers of companies scoring in the 30-60% bands have doubled from 15 in 2017 to over 30 in 2019. Companies average scores has also seen an improvement of 13% from year 2017 to 2019, with companies average score increasing from 18% in 2017 to 31% in 2019.

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.

The Corporate Human Rights Benchmark is funded by governments (and investors and some foundations) and leading policy makers are very interested in its potential as a soft law mechanism to advance the business and human rights agenda. The extensive consultation process around both the pilot benchmark and the latest developments has included a wide range of trade associations and industry bodies in the three sectors involved to date (extractives, apparel and agriculture/food companies).

We have also met with organisations such as the Charity Commission to discuss the current guidance for charities around responsible investment.

Communication and sharing ESG information

AOS 17

Mandatory

Public

Descriptive

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

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.

AOS 17.3

Additional information [OPTIONAL]

Both Corporate Human Rights Benchmark and the Investment in Occupied Lands projects are public databases where there is full disclosure of the research.

EIRIS Foundation

Reported Information

Public version

Investment Consultancy

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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)
- Other, specify (2)

IC 01.2

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

Our charitysri.org and yourethicalmoney.org websites provide free public information and advice on responsible investment which charity and retail investors (or their advisers) can use to help their develop their responsible investment policies.

Further support for charities in developing responsible investment policies or looking for ways to work with other responsible investors to advance aspects of their missions related to ESG would be offered with a fixed fee or daily rate to be agreed before the work was undertaken.

IC 01.3

Additional information. [OPTIONAL]

Our Investment in Occupied Lands project has published a database of companies with interests in Crimea and Palestine. We have worked with investors to look at ways they can engage with these topics in a manner consistent with their wider responsibilities and objectives. We have identified the human rights due diligence process under the UN Guiding Principles for Business and Human Rights as something investors could seek to encourage companies investing in these territories to apply, and the recent OECD Guidelines for investors on due diligence provides further encouragement in this direction. We have produced a report related to this entitled: "Questions to help companies respect human rights in occupied territories" So this is a very particular aspect of investment policy development, but one that has troubled a number of asset owners who may face divided and strongly held opinions amongst their own stakeholders in such cases and are looking for a way forward.

IC 02

Mandatory to Report Voluntary to Disclose

Public

IC 02

Indicate your total assets under advisement at the end of your reporting year.

- Indicate your total assets under advisement
- Not applicable

IC 02.2

Please explain why this indicator is not applicable to you.

We have not got a method to see the value of people using our free advice through charitysri.org or yourethicalmoney.org.

IC 03

Mandatory

Public

IC 03.1

Indicate whether you provide fiduciary management services.

- Yes, we do
- No, we do not

IC 04

Voluntary

Public

Descriptive

IC 04.1

Indicate whether you are asked to embed ESG consideration in contracts and/or business plans with clients.

- Yes, we typically are
- Yes, we occasionally are
- No, we are not
- Our organisation embeds ESG considerations in contracts as a standard procedure
- Not applicable

IC 04.2

If yes, describe how ESG considerations are incorporated into contracts with clients.

We only work on ESG issues, so grant agreements or contracts for our "public" services are all about the provision of ESG data or other information and any services we provide to charities will be about ESG issues as well.

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

IC 06.4

Additional information. [OPTIONAL]

All of these steps are addressed in charitysri.org to varying degrees on a public free basis and can be supplemented by tailored advice to individual charities.

Manager selection and monitoring**IC 19****Voluntary****Public****Descriptive****IC 19.1**

Provide examples of cases where ESG was incorporated into your services.

Service line

- Investment policy development

Case example

We only work on ESG issues and so it is incorporated into all of our services. A specific example is in our work producing resources for charities, we have produced a toolkit for charities intended to help them with developing their own responsible investment policy. This is available here: http://www.charitysri.org/downloads/key_publications/toolkit_for_charity_trustees.pdf

EIRIS Foundation

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

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]

Our research products (research for the Corporate Human Rights Benchmark, the Investment in Occupied Lands project and the research into retail investment products banks and insurance companies in the UK) are all made publicly available: both raw data and any analysis or ratings made on the basis of the raw data.

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)
- Other, specify (2)
- 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.

For our research for the Corporate Human Rights Benchmark materiality is defined at several levels: (1) The companies assessed (extractives, apparel and agriculture/food companies) have been chosen as belonging to sectors particularly affected by human rights challenges; (2) within the benchmark each sector is assessed according to criteria that reflect the materiality of that issue to the sector. It is worth saying that business and human rights work generally focuses on "salience" (=the risk to the rights holder, rather than what may impact the company) but in many cases this focus identifies issues that are indeed material to the company as well, or else have an increasing likelihood of becoming so through impacts on human capital, legal developments, access to resources, industrial accidents or the effects of the company's general reputation upon its business. The data is presented indicator by indicator as well, so an investor could take their own view of the materiality of each element of the assessment.

In the case of our Investment in Occupied Lands project operations in Crimea or Palestine is taken as the materiality threshold for inclusion in the database.

In our yourethicalmoney.org database for UK retail investors materiality is defined by the user of the website by selecting the factors they are concerned about.

RDP 04**Mandatory****Public****Descriptive**

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

RDP 04.2

Additional information. [OPTIONAL]

The Corporate Human Rights Benchmark has now moved towards an annual cycle (though with 18 months between the pilot and the next benchmark) with opportunities for companies to review and provide more detail in each cycle. There is a portal to allow companies to publish fresh information in time for the project deadlines, and this year we have made available a spreadsheet aligned to the benchmark indicators simplifying the process of companies publishing relevant data if they wish to do so.

The Investment in Occupied Lands project has been updated three times in three years and can make changes to the database at any time in the light of new information arising from the monitoring referred to.

The updating cycle for yourethicalmoney.org and the charity product sections of charitysri.org are under review at present, some sections have been updated and moving forward more regular updates of the information will take place although the nature of the websites may be changing.

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

The Corporate Human Rights Benchmark analyses or makes use of a number of quantitative indicators (for example trends in performance amongst the company's supply chain, health and safety data, statistics on the use of grievance mechanisms or audit processes and progress in implementing living wage policies) but it focuses more on the assessment of qualitative data on policies and practices such as how a company has engaged with customary owners when purchasing land)

Our yourethicalmoney.org website focuses mainly on helping retail investor to identify the products or institutions that meet their particular requirements and so this tends to be based upon the assessment of qualitative data.

The Investment in Occupied Lands project is focused on identifying companies with operations in Crimea or Palestine.

- Balancing management/process oriented indicators and performance indicators

Explain your approach

The Corporate Human Rights Benchmark allocate 60% of its score to policies and processes (including the operation grievance mechanisms) and 40% to performance as measured by detailed practices (for example taking identity documents off workers or the implementation of living wage policies) and by assessing how the company has responded to serious allegations from stakeholders about the human rights performance.

The Investment in Occupied Lands database presently assesses only whether companies are present in Crimea or Palestine, but is considering extending to provide information about due diligence processes that have been undertaken by the companies concerned which would include a mixture of management/process indicators and potentially disclosing information about performance.

Our yourethicalmoney.org website is focused largely on assessing the policies and processes followed by each of the retail products examined, but funds may also disclose information about their ESG performance, for example their engagement activities.

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

Explain your approach

The Corporate Human Rights Benchmark does compare performance in previous years with that achieved in 2019. The complication here is that the scoring system has changed in some respects and there have been other improvements in the methodology between the two exercises.

Our yourethicalmoney.org website and the Investment in Occupied Lands database both focus on our understanding of the current situation.

- Balancing environmental, social and governance indicators

Explain your approach

Our yourethicalmoney.org website covers the full range of ESG criteria, whereas the corporate human rights benchmark focusing only on human rights (although it does include the governance of human rights and some environmental criteria such as water or environmental damage affecting local livelihoods), while the Investment in Occupied Lands database only focuses on operations in Crimea and Palestine.

- Balancing self-reported and public data

Explain your approach

Our yourethicalmoney.org website is based largely on data reported to us by the retail fund provider or financial institution, but it does also include data we've been able to find on public websites.

The Investment in Occupied Lands databases is heavily based on third party data although also on data drawn from companies' public documents such as annual reports. Companies are given the opportunity to review and add to or updates the information we have obtained.

The Corporate Human Rights Benchmark is based upon information both from companies and from stakeholders in the form of allegations of poor human rights performance, but all information has to be made public in order to be assessed. The project provides a specific portal to allow companies to make public new information before the research and also after the engagement phase if they wish it to form part of their assessment, in order to comply with the public information rule. This year we have introduced a special Excel tool to make it easier for companies to publish information against each of the indicators if they wish to do so.

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

RDP 06	Mandatory	Public	Descriptive
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RDP 06.1	Describe the control processes in place to ensure quality of research.
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All our projects involve providing the companies or the funds involved with sight of the research before publication with the opportunity to alert us to errors and to propose any corrections and amendments they would like us to consider. Tricky cases and judgements are referred to colleagues or escalated as necessary. There are public methodology documents which aim to be clear and unambiguous and more detailed written methodology handbooks for researchers that document decisions and finer points and are updated as new research questions emerge.

In the pilot Corporate Human Rights Benchmark each company was researched by a different researcher before and after the engagement phase of the project and a sample of the assessments were reviewed by external researchers or experts. During the process individual researchers could also raise issues for clarification at regular team meetings held for that purpose and specific points were escalated to the methodology committee as necessary. There was a review of the highest scores for all companies indicator by indicator to ensure consistency across companies and sectors before publication as well.

The 2019 Benchmark incorporated a review of each assessment by a second more senior researcher and the database was enhanced to facilitate consistency, ensure coverage of all key documents published by the company and make available advice and FAQs to the analysts. The same engagement process we used in 2018 was followed, but the new excel tool for companies to submit new data makes it easier for companies to clarify the points they wish to make public or to point us to specific material they feel may have been overlooked.

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

RDP 07.2	Describe how you incorporate the identified ESG issues and trends in your product offerings and business activities.
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The Corporate Human Rights Benchmark was designed to put more focus on a series of emerging issues in the field of business and human rights (which is itself an overall emerging issue as people look for "more S in ESG"). Examples we included following stakeholder consultation included respecting and protecting the rights of human rights defenders in particular, public commitments to remedy in the case of adverse human rights impacts, implementing living wages policies across supply chains and publishing details of your suppliers globally. Such best practices are given the highest scores within the benchmark framework so that those companies with the highest scores needs to be addressing most or at least a good number of these to continue to score well.

The idea of investors using the due diligence process for the UN Guiding Principles on Business and Human Rights as an "ask" for companies investing in Crimea or Palestine seemed to work with investors in the roundtables we held in the autumn of 2017. We will be incorporating that in the project by working with individual investors to pursue this idea, and also potentially adding to the database details of any due diligence assessments that companies publish as a result.

We are looking at adding "impact investment" opportunities for retail investors to yourethicalmoney.org as a specific emerging trend in this area.

The Foundation is continuing work on other strategies that focus on trends that we feel would be of general benefit to responsible investors if they emerged in the coming years: the first is "transformational engagement" by investors, by which we mean engagement strategies designed to facilitate meaningful change to the global economy (or parts of it) so that successful economic

activity can be sustainable in the long term; and the second is to understand and promote the spread of best practice corporate responsibility which is too often practiced only by a handful of leaders, when the portfolio benefits depend upon much wider uptake.

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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Retail investors are able to use yourethicalmoney.org to help them understand and choose between the different responsible investment strategies available in the UK retail marketplace.

The Corporate Human Rights Benchmark published a progress report which includes an assessment of the impact of the project to date (<https://www.corporatebenchmark.org/sites/default/files/documents/CHRB%202018%20Progress%20Report%20Web%20Final.pdf>) and this provided a platform for investors to congratulate the leaders and challenge the laggards as well as making use of the overall rankings and the detailed assessments in their individual approaches to responsible investment.

Investors have used the Investment in Occupied Lands database to assess their risk exposure of their portfolio and the report we produced: Questions to help companies respect human rights in occupied territories is a useful tool for investors to understand the risks and potential human rights implications of investing in companies which operate in occupied territories.

Not applicable for our organisation

EIRIS Foundation

Reported Information

Public version

Confidence building measures

PRI disclaimer

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

Confidence building measures

CM1 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)
- 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