About this report

The PRI Reporting Framework is a key step in the journey towards building a common language and industry standard for reporting responsible investment (RI) activities. This RI Transparency Report is one of the key outputs of this Framework. Its primary objective is to enable signatory transparency on RI activities and facilitate dialogue between investors and their clients, beneficiaries and other stakeholders. A copy of this report will be publicly disclosed for all reporting signatories on the PRI website, ensuring accountability of the PRI Initiative and its signatories.

This report is an export of the individual Signatory organisation's response to the PRI during the 2019 reporting cycle. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information. As a result, the reports can be extensive. However, to help easily locate information, there is a Principles index which highlights where the information can be found and summarises the indicators that signatories complete and disclose.

Understanding the Principles Index

The Principles Index summarises the response status for the individual indicators and modules and shows how these relate to the six Principles for Responsible Investment. It can be used by stakeholders as an ‘at-a-glance’ summary of reported information and to identify particular themes or areas of interest.

Indicators can refer to one or more Principles. Some indicators are not specific to any Principle. These are highlighted in the ‘General’ column. When multiple Principles are covered across numerous indicators, in order to avoid repetition, only the main Principle covered is highlighted.

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

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<td>⚠</td>
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Within the table, indicators marked in blue are mandatory to complete. Indicators marked in grey are voluntary to complete.
Principles Index
### Organisational Overview

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**Confidence building measures**

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FIM Asset Management

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

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<tr>
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<td>☐ &lt;10%</td>
</tr>
<tr>
<td></td>
<td>☐ 10-50%</td>
</tr>
<tr>
<td></td>
<td>☑ &gt;50%</td>
</tr>
<tr>
<td>Fund of funds, manager of managers, sub-advised products</td>
<td>☐ 0%</td>
</tr>
<tr>
<td></td>
<td>☑ &lt;10%</td>
</tr>
<tr>
<td></td>
<td>☐ 10-50%</td>
</tr>
<tr>
<td></td>
<td>☐ &gt;50%</td>
</tr>
<tr>
<td>Other</td>
<td>☐ 0%</td>
</tr>
<tr>
<td></td>
<td>☐ &lt;10%</td>
</tr>
<tr>
<td></td>
<td>☐ 10-50%</td>
</tr>
<tr>
<td></td>
<td>☐ &gt;50%</td>
</tr>
<tr>
<td>Total 100%</td>
<td></td>
</tr>
</tbody>
</table>

Further options (may be selected in addition to the above)
- ☐ Hedge funds
- ☐ Fund of hedge funds

<table>
<thead>
<tr>
<th>OO 02</th>
<th>Mandatory</th>
<th>Public</th>
<th>Peering</th>
<th>General</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>OO 02.1</strong></td>
<td>Select the location of your organisation’s headquarters.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Finland</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>OO 02.2</th>
<th>Indicate the number of countries in which you have offices (including your headquarters).</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ 1</td>
<td>☐ 2-5</td>
</tr>
<tr>
<td>☐ 6-10</td>
<td>☐ &gt;10</td>
</tr>
</tbody>
</table>
### OO 02.3
Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).

<table>
<thead>
<tr>
<th>FTE</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>40</td>
<td></td>
</tr>
</tbody>
</table>

### OO 03

#### OO 03.1
Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.

- ☐ Yes
- ☑ No

### OO 04

#### OO 04.1
Indicate the year end date for your reporting year.

31/12/2018

#### OO 04.2
Indicate your total AUM at the end of your reporting year.

Include the AUM of subsidiaries, but exclude advisory/execution only assets, and exclude the assets of your PRI signatory subsidiaries that you have chosen not to report on in OO 03.2

<table>
<thead>
<tr>
<th>Total AUM</th>
<th>trillions</th>
<th>billions</th>
<th>millions</th>
<th>thousands</th>
<th>hundreds</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>3</td>
<td>562</td>
<td>003</td>
<td>000</td>
<td></td>
</tr>
<tr>
<td>Currency</td>
<td>EUR</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Assets in USD</td>
<td>4</td>
<td>063</td>
<td>864</td>
<td>758</td>
<td></td>
</tr>
</tbody>
</table>

- ☐ Not applicable as we are in the fund-raising process

#### OO 04.4
Indicate the total assets at the end of your reporting year subject to an execution and/or advisory approach.

<table>
<thead>
<tr>
<th>Total AUM</th>
<th>trillions</th>
<th>billions</th>
<th>millions</th>
<th>thousands</th>
<th>hundreds</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>10</td>
<td>900</td>
<td>000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Currency</td>
<td>EUR</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Assets in USD</td>
<td>12</td>
<td>435</td>
<td>735</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- ☐ Not applicable as we do not have any assets under execution and/or advisory approach
FIM also administers funds managed by Local Tapiola Asset Management Ltd. These assets are not included in the reports.

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

- ○ as percentage breakdown
- ⋄ as broad ranges

<table>
<thead>
<tr>
<th></th>
<th>Internally managed (%)</th>
<th>Externally managed (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Listed equity</td>
<td>&gt;50%</td>
<td>&lt;10%</td>
</tr>
<tr>
<td>Fixed income</td>
<td>10-50%</td>
<td>&lt;10%</td>
</tr>
<tr>
<td>Private equity</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Property</td>
<td>&lt;10%</td>
<td>0</td>
</tr>
<tr>
<td>Infrastructure</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Commodities</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Hedge funds</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Fund of hedge funds</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Forestry</td>
<td>&lt;10%</td>
<td>0</td>
</tr>
<tr>
<td>Farmland</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Inclusive finance</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Cash</td>
<td>&lt;10%</td>
<td>0</td>
</tr>
<tr>
<td>Money market instruments</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Other (1), specify</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Other (2), specify</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>OO 06.2</strong></td>
<td>Publish asset class mix as per attached image [Optional].</td>
<td></td>
</tr>
</tbody>
</table>
| **OO 06.3** | Indicate whether your organisation has any off-balance sheet assets [Optional].

- Yes
- No

| **OO 06.5** | Indicate whether your organisation uses fiduciary managers.

- Yes, we use a fiduciary manager and our response to OO 5.1 is reflective of their management of our assets.
- No, we do not use fiduciary managers.

<table>
<thead>
<tr>
<th><strong>OO 07</strong></th>
<th>Mandatory to Report Voluntary to Disclose</th>
<th>Public</th>
<th>Gateway</th>
<th>General</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>OO 07.1</strong></td>
<td>Provide to the nearest 5% the percentage breakdown of your Fixed Income AUM at the end of your reporting year, using the following categories.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Internally managed</td>
<td>SSA</td>
<td>45</td>
<td></td>
<td></td>
</tr>
<tr>
<td>--------------------</td>
<td>-----</td>
<td>----</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Corporate (financial)</td>
<td>10</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Corporate (non-financial)</td>
<td>45</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Securitised</td>
<td>0</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td>100%</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Externally managed</th>
<th>SSA</th>
<th>0</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Corporate (financial)</td>
<td>10</td>
</tr>
<tr>
<td></td>
<td>Corporate (non-financial)</td>
<td>90</td>
</tr>
<tr>
<td></td>
<td>Securitised</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td>100%</td>
</tr>
</tbody>
</table>

New selection options have been added to this indicator. Please review your prefilled responses carefully.

**OO 08.1** Provide a breakdown of your organisation’s externally managed assets between segregated mandates and pooled funds or investments.
### Asset class breakdown

<table>
<thead>
<tr>
<th>Asset class breakdown</th>
<th>Segregated mandate(s)</th>
<th>Pooled fund(s) or pooled investment(s)</th>
<th>Total of the asset class (each row adds up to 100%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>[a] Listed equity</td>
<td>☰ 0%</td>
<td>☰ 0%</td>
<td>100%</td>
</tr>
<tr>
<td></td>
<td>☐ &lt;10%</td>
<td>☐ &lt;10%</td>
<td></td>
</tr>
<tr>
<td></td>
<td>☐ 10-50%</td>
<td>☐ 10-50%</td>
<td></td>
</tr>
<tr>
<td></td>
<td>☐ &gt;50 %</td>
<td>☐ &gt;50 %</td>
<td></td>
</tr>
<tr>
<td>[c] Fixed income – Corporate (financial)</td>
<td>☰ 0%</td>
<td>☰ 0%</td>
<td>100%</td>
</tr>
<tr>
<td></td>
<td>☐ &lt;10%</td>
<td>☐ &lt;10%</td>
<td></td>
</tr>
<tr>
<td></td>
<td>☐ 10-50%</td>
<td>☐ 10-50%</td>
<td></td>
</tr>
<tr>
<td></td>
<td>☐ &gt;50 %</td>
<td>☐ &gt;50 %</td>
<td></td>
</tr>
<tr>
<td>[d] Fixed income – Corporate (non-financial)</td>
<td>☰ 0%</td>
<td>☰ 0%</td>
<td>100%</td>
</tr>
<tr>
<td></td>
<td>☐ &lt;10%</td>
<td>☐ &lt;10%</td>
<td></td>
</tr>
<tr>
<td></td>
<td>☐ 10-50%</td>
<td>☐ 10-50%</td>
<td></td>
</tr>
<tr>
<td></td>
<td>☐ &gt;50 %</td>
<td>☐ &gt;50 %</td>
<td></td>
</tr>
</tbody>
</table>

#### OO 09

<table>
<thead>
<tr>
<th></th>
<th>Mandatory</th>
<th>Public</th>
<th>Peering</th>
<th>General</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>OO 09.1</strong></td>
<td>Indicate the breakdown of your organisation’s AUM by market.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Developed Markets**
- 78

**Emerging Markets**
- 18

**Frontier Markets**
- 4

**Other Markets**
- 0

**Total 100%**
- 100%

### Asset class implementation gateway indicators
**OO 10.1** Select the active ownership activities your organisation implemented in the reporting year.

**Listed equity – engagement**

- [x] We engage with companies on ESG factors via our staff, collaborations or service providers.
- [ ] We require our external managers to engage with companies on ESG factors on our behalf.
- [ ] We do not engage directly and do not require external managers to engage with companies on ESG factors.

**Listed equity – voting**

- [ ] We cast our (proxy) votes directly or via dedicated voting providers
- [ ] We require our external managers to vote on our behalf.
- [x] We do not cast our (proxy) votes directly and do not require external managers to vote on our behalf.

**OO 10.3** Indicate why you do not cast your votes

- [x] We renewed our policies for ESG and ownership in 2018. During that year we did not have voting activity. In 2019 we will be voting especially in domestic markets according to our new ownership policy.
- [ ] We do not cast our votes but provide substantive research and voting recommendations to our clients.

**Fixed income SSA – engagement**

- [ ] We engage with SSA bond issuers on ESG factors via our staff, collaborations or service providers.
- [x] We do not engage directly and do not require external managers to engage with SSA bond issuers on ESG factors. Please explain why you do not.

Please explain why you do not engage directly and do not require external managers to engage with companies on ESG factors.

So far we have found it difficult to engage with sovereigns and there has been no issues with other SA assets.

**Fixed income Corporate (financial) – engagement**

- [x] We engage with companies on ESG factors via our staff, collaborations or service providers.
- [ ] We require our external managers to engage with companies on ESG factors on our behalf.
- [ ] We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.
### Fixed income Corporate (non-financial) – engagement

- [x] We engage with companies on ESG factors via our staff, collaborations or service providers.
- [ ] We require our external managers to engage with companies on ESG factors on our behalf.
- [ ] We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.

<table>
<thead>
<tr>
<th>OO 11</th>
<th>Mandatory</th>
<th>Public</th>
<th>Gateway</th>
<th>General</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>OO 11.1</strong></td>
<td>Select the internally managed asset classes in which you addressed ESG incorporation into your investment decisions and/or your active ownership practices (during the reporting year).</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Listed equity</td>
<td>[ ] We address ESG incorporation.</td>
<td>[ ] We do not do ESG incorporation.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fixed income - SSA</td>
<td>[ ] We address ESG incorporation.</td>
<td>[ ] We do not do ESG incorporation.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fixed income - corporate (financial)</td>
<td>[ ] We address ESG incorporation.</td>
<td>[ ] We do not do ESG incorporation.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fixed income - corporate (non-financial)</td>
<td>[ ] We address ESG incorporation.</td>
<td>[ ] We do not do ESG incorporation.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property</td>
<td>[ ] We address ESG incorporation.</td>
<td>[ ] We do not do ESG incorporation.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Forestry</td>
<td>[ ] We address ESG incorporation.</td>
<td>[ ] We do not do ESG incorporation.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cash</td>
<td>[ ] We address ESG incorporation.</td>
<td>[ ] We do not do ESG incorporation.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Select the externally managed assets classes in which you and/or your investment consultants address ESG incorporation in your external manager selection, appointment and/or monitoring processes.

<table>
<thead>
<tr>
<th>Asset class</th>
<th>ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Listed equity</td>
<td>Listed equity - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</td>
</tr>
<tr>
<td></td>
<td>✓ We incorporate ESG into our external manager selection process</td>
</tr>
<tr>
<td></td>
<td>✓ We invest only in pooled funds and external manager appointment is not applicable</td>
</tr>
<tr>
<td></td>
<td>□ We incorporate ESG into our external manager monitoring process</td>
</tr>
<tr>
<td></td>
<td>□ We do not do ESG incorporation</td>
</tr>
<tr>
<td>Fixed income - corporate</td>
<td>Fixed income - corporate (financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</td>
</tr>
<tr>
<td>(financial)</td>
<td>✓ We incorporate ESG into our external manager selection process</td>
</tr>
<tr>
<td></td>
<td>✓ We invest only in pooled funds and external manager appointment is not applicable</td>
</tr>
<tr>
<td></td>
<td>□ We incorporate ESG into our external manager monitoring process</td>
</tr>
<tr>
<td></td>
<td>□ We do not do ESG incorporation</td>
</tr>
<tr>
<td>Fixed income - corporate</td>
<td>Fixed income - corporate (non-financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</td>
</tr>
<tr>
<td>(non-financial)</td>
<td>✓ We incorporate ESG into our external manager selection process</td>
</tr>
<tr>
<td></td>
<td>✓ We invest only in pooled funds and external manager appointment is not applicable</td>
</tr>
<tr>
<td></td>
<td>□ We incorporate ESG into our external manager monitoring process</td>
</tr>
<tr>
<td></td>
<td>□ We do not do ESG incorporation</td>
</tr>
</tbody>
</table>

Provide a brief description of how your organisation includes responsible investment considerations in your investment manager selection, appointment and monitoring processes.

We require our external managers of pooled funds to be signatories of UNPRI.

For your externally managed pooled funds, describe any mechanisms in place to set expectations as part of the appointment or commitment process.

We make it clear that our expectations for external managers regarding ESG are rising. This is typically communicated during the meetings and calls with potential managers. We are currently looking to strengthen and systemize the process.
Below are all applicable modules or sections you may report on. Those which are mandatory to report (asset classes representing 10% or more of your AUM) are already ticked and read-only. Those which are voluntary to report on can be opted into by ticking the box.

### Core modules
- Organisational Overview
- Strategy and Governance

### RI implementation directly or via service providers
- Direct - Listed Equity incorporation
  - Listed Equity incorporation
- Direct - Listed Equity active ownership
  - Engagements
- Direct - Fixed Income
  - Fixed income - SSA
  - Fixed income - Corporate (financial)
  - Fixed income - Corporate (non-financial)
- Direct - Other asset classes with dedicated modules
  - Property

### RI implementation via external managers
- Indirect - Selection, Appointment and Monitoring of External Managers
  - Listed Equities
  - Fixed income - Corporate (financial)
  - Fixed income - Corporate (non-financial)

### Closing module
- Closing module

---

### Peering questions

---

**OO LE 01**

<table>
<thead>
<tr>
<th>Mandatory</th>
<th>Public</th>
<th>Gateway</th>
<th>General</th>
</tr>
</thead>
</table>

---
Provide a breakdown of your internally managed listed equities by passive, active - quantitative (quant), active - fundamental and active - other strategies.

Update: this indicator has changed from "Mandatory to report, voluntary to disclose" to "Mandatory". Your response to this indicator will be published in the Public Transparency Report. This change is to enable improved analysis and peering.

Percentage of internally managed listed equities

<table>
<thead>
<tr>
<th>Strategies</th>
<th>Percentage of internally managed listed equities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Passive</td>
<td>• &gt;50%</td>
</tr>
<tr>
<td></td>
<td>• 10-50%</td>
</tr>
<tr>
<td></td>
<td>• &lt;10%</td>
</tr>
<tr>
<td></td>
<td>• 0%</td>
</tr>
<tr>
<td>Active - quantitative (quant)</td>
<td>• &gt;50%</td>
</tr>
<tr>
<td></td>
<td>• 10-50%</td>
</tr>
<tr>
<td></td>
<td>• &lt;10%</td>
</tr>
<tr>
<td></td>
<td>• 0%</td>
</tr>
<tr>
<td>Active - fundamental and active - other</td>
<td>• &gt;50%</td>
</tr>
<tr>
<td></td>
<td>• 10-50%</td>
</tr>
<tr>
<td></td>
<td>• &lt;10%</td>
</tr>
<tr>
<td></td>
<td>• 0%</td>
</tr>
<tr>
<td>Total 100%</td>
<td></td>
</tr>
</tbody>
</table>

OO LE 02.1 For strategies that account for less than 10% of your internally managed listed equities, indicate if you would still like to report your activities.

Report on strategy

<table>
<thead>
<tr>
<th>All active strategies</th>
<th>Yes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>No</td>
</tr>
</tbody>
</table>

OO FI 01 Mandatory

Update: this indicator has changed from "Mandatory to report, voluntary to disclose" to "Mandatory". Your response to this indicator will be published in the Public Transparency Report. This change is to enable improved analysis and peering.
**OO FI 01.1** Provide a breakdown of your internally managed fixed income securities by active and passive strategies

<table>
<thead>
<tr>
<th>Type</th>
<th>Passive</th>
<th>Active - quantitative</th>
<th>Active - fundamental &amp; others</th>
<th>Total internally managed fixed income security</th>
</tr>
</thead>
<tbody>
<tr>
<td>SSA</td>
<td>○ &gt;50%</td>
<td>○ &gt;50%</td>
<td>○ &gt;50%</td>
<td>100%</td>
</tr>
<tr>
<td></td>
<td>○ 10-50%</td>
<td>○ 10-50%</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>○ &lt;10%</td>
<td>○ &lt;10%</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>⊗ 0%</td>
<td>⊗ 0%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Corporate (financial)</td>
<td>○ &gt;50%</td>
<td>○ &gt;50%</td>
<td>○ &gt;50%</td>
<td>100%</td>
</tr>
<tr>
<td></td>
<td>○ 10-50%</td>
<td>○ 10-50%</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>○ &lt;10%</td>
<td>○ &lt;10%</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>⊗ 0%</td>
<td>⊗ 0%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Corporate (non-financial)</td>
<td>○ &gt;50%</td>
<td>○ &gt;50%</td>
<td>○ &gt;50%</td>
<td>100%</td>
</tr>
<tr>
<td></td>
<td>○ 10-50%</td>
<td>○ 10-50%</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>○ &lt;10%</td>
<td>○ &lt;10%</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>⊗ 0%</td>
<td>⊗ 0%</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**OO FI 03**

<table>
<thead>
<tr>
<th>Mandatory</th>
<th>Public</th>
<th>Descriptive</th>
<th>General</th>
</tr>
</thead>
</table>
| Update: this indicator has changed from "Mandatory to report, voluntary to disclose" to "Mandatory". Your response to this indicator will be published in the Public Transparency Report. This change is to enable improved analysis and peering.

**OO FI 03.1** Indicate the approximate (+/- 5%) breakdown of your SSA investments, by developed markets and emerging markets.

<table>
<thead>
<tr>
<th>SSA</th>
<th>Developed markets</th>
<th>70</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Emerging markets</td>
<td>30</td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td>100%</td>
</tr>
</tbody>
</table>
Indicate the approximate (+/-5%) breakdown of your corporate and securitised investments by investment grade or high-yield securities.

<table>
<thead>
<tr>
<th>Type</th>
<th>Investment grade (+/- 5%)</th>
<th>High-yield (+/- 5%)</th>
<th>Total internally managed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Corporate (financial)</td>
<td>⊘ &gt;50%</td>
<td>⊘ &gt;50%</td>
<td>100%</td>
</tr>
<tr>
<td></td>
<td>⊘ 10-50%</td>
<td>⊘ 10-50%</td>
<td></td>
</tr>
<tr>
<td></td>
<td>⊘ &lt;10%</td>
<td>⊘ &lt;10%</td>
<td></td>
</tr>
<tr>
<td></td>
<td>⊘ 0%</td>
<td>⊘ 0%</td>
<td></td>
</tr>
<tr>
<td>Corporate (non-financial)</td>
<td>⊘ &gt;50%</td>
<td>⊘ &gt;50%</td>
<td>100%</td>
</tr>
<tr>
<td></td>
<td>⊘ 10-50%</td>
<td>⊘ 10-50%</td>
<td></td>
</tr>
<tr>
<td></td>
<td>⊘ &lt;10%</td>
<td>⊘ &lt;10%</td>
<td></td>
</tr>
<tr>
<td></td>
<td>⊘ 0%</td>
<td>⊘ 0%</td>
<td></td>
</tr>
</tbody>
</table>

If you are invested in private debt and reporting on ratings is not relevant for you, please indicate below.

☐ OO FI 03.2 is not applicable as our internally managed fixed income assets are invested only in private debt.

Provide a breakdown of your externally managed listed equities and fixed income by passive, active quant and, active fundamental and other active strategies.
<table>
<thead>
<tr>
<th>Listed equity (LE)</th>
<th>Passive</th>
<th>Active - quantitative (quant)</th>
<th>Active - fundamental and active - other</th>
</tr>
</thead>
<tbody>
<tr>
<td>72</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>0</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>28</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>100%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fixed income - Corporate (financial)</td>
<td>Passive</td>
<td>Active - quantitative (quant)</td>
<td>Active - fundamental and active - other</td>
</tr>
<tr>
<td>0</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>0</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>100</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>100%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fixed income - Corporate (non-financial)</td>
<td>Passive</td>
<td>Active - quantitative (quant)</td>
<td>Active - fundamental and active - other</td>
</tr>
<tr>
<td>0</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>0</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>100</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>100%</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**OO PR 01**  
Mandatory to Report Voluntary to Disclose  
Public  
Descriptive  
General
### OO PR 01.1
Indicate the level of ownership you typically hold in your property investments.

- a majority stake (>50%)
- a 50% stake
- a significant minority stake (between 10-50%)
- a limited minority stake (<10%)
- a mix of ownership stakes
- N/A, we manage properties, new constructions and/or refurbishments on behalf of our clients, but do not hold equity in property on their behalf

### OO PR 01.2
Provide a breakdown of your organisation’s allocation to Real Estate Investment Trusts (REITs) or similar.

- >50%
- 10 – 50%
- <10%
- 0%

### OO PR 02
Mandatory to Report Voluntary to Disclose

<table>
<thead>
<tr>
<th>Public</th>
<th>Gateway</th>
<th>General</th>
</tr>
</thead>
</table>

### OO PR 02.1
Provide a breakdown of your organisation’s property assets based on who manages the assets.
<table>
<thead>
<tr>
<th>Property assets managed by</th>
<th>Breakdown of your property assets (by number)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Managed directly by your organisation</td>
<td><img src="https://example.com/property_assets.png" alt="Image" /></td>
</tr>
<tr>
<td>Managed via third-party property managers appointed by you</td>
<td><img src="https://example.com/third_party.png" alt="Image" /></td>
</tr>
<tr>
<td>Managed by other investors or their property managers</td>
<td><img src="https://example.com/other_investors.png" alt="Image" /></td>
</tr>
<tr>
<td>Managed by tenant(s) with operational control</td>
<td><img src="https://example.com/tenant_control.png" alt="Image" /></td>
</tr>
<tr>
<td>Total 100%</td>
<td><img src="https://example.com/total.png" alt="Image" /></td>
</tr>
</tbody>
</table>
FIM Asset Management

Reported Information

Public version

Strategy and Governance

PRI disclaimer

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

<table>
<thead>
<tr>
<th>SG 01</th>
<th>Mandatory</th>
<th>Public</th>
<th>Core Assessed</th>
<th>General</th>
</tr>
</thead>
</table>

New selection options have been added to this indicator. Please review your prefilled responses carefully.

**SG 01.1** Indicate if you have an investment policy that covers your responsible investment approach.

☐ Yes

**SG 01.2** Indicate the components/types and coverage of your policy.

Select all that apply

<table>
<thead>
<tr>
<th>Policy components/types</th>
<th>Coverage by AUM</th>
</tr>
</thead>
<tbody>
<tr>
<td>✅ Policy setting out your overall approach</td>
<td>☑ Applicable policies cover all AUM</td>
</tr>
<tr>
<td>✅ Formalised guidelines on environmental factors</td>
<td>☑ Applicable policies cover a majority of AUM</td>
</tr>
<tr>
<td>✅ Formalised guidelines on social factors</td>
<td>☑ Applicable policies cover a minority of AUM</td>
</tr>
<tr>
<td>✅ Formalised guidelines on corporate governance factors</td>
<td></td>
</tr>
<tr>
<td>☐ Fiduciary (or equivalent) duties</td>
<td></td>
</tr>
<tr>
<td>✅ Asset class-specific RI guidelines</td>
<td></td>
</tr>
<tr>
<td>☐ Sector specific RI guidelines</td>
<td></td>
</tr>
<tr>
<td>✅ Screening / exclusions policy</td>
<td></td>
</tr>
<tr>
<td>✅ Engagement policy</td>
<td></td>
</tr>
<tr>
<td>✅ (Proxy) voting policy</td>
<td></td>
</tr>
<tr>
<td>☐ Other, specify (1)</td>
<td></td>
</tr>
<tr>
<td>☐ Other, specify(2)</td>
<td></td>
</tr>
</tbody>
</table>
SG 01.3 Indicate if the investment policy covers any of the following

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

SG 01.4 Describe your organisation’s investment principles and overall investment strategy, interpretation of fiduciary (or equivalent) duties, and how they consider ESG factors and real economy impact.

We believe that incorporating ESC factors in the investment decision making process alongside with financial factors will enhance portfolio performance and reduce risk in the long run.

☐ No

I confirm I have read and understood the Accountability tab for SG 01

SG 02 Mandatory Public Core Assessed PRI 6

New selection options have been added to this indicator. Please review your prefilled responses carefully.

SG 02.1 Indicate which of your investment policy documents (if any) are publicly available. Provide a URL and an attachment of the document.

☒ Policy setting out your overall approach

☐ URL/Attachment

☒ URL

{hyperlink:https://www.fim.com/fi/fim/vastuullinen-fim/}

☐ Attachment (will be made public)
☒ Formalised guidelines on environmental factors
Formalised guidelines on social factors

Formalised guidelines on corporate governance factors

Asset class-specific RI guidelines

Screening / exclusions policy
<table>
<thead>
<tr>
<th>SG 02.2</th>
<th>Indicate if any of your investment policy components are publicly available. Provide URL and an attachment of the document.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Your organisation’s definition of ESG and/or responsible investment and it’s relation to investments</td>
<td></td>
</tr>
<tr>
<td>URL Attachment</td>
<td></td>
</tr>
<tr>
<td>URL</td>
<td></td>
</tr>
</tbody>
</table>

| URL |
| {hyperlink:https://www.fim.com/fi/fim/vastuullinen-fim/} |
| Attachment (will be made public) |

| Engagement policy |
| URL/Attachment |
| URL |

| URL |
| {hyperlink:https://www.fim.com/fi/fim/vastuullinen-fim/} |
| Attachment (will be made public) |

| (Proxy) voting policy |
| URL/Attachment |
| URL |

| URL |
| {hyperlink:https://www.fim.com/fi/fim/vastuullinen-fim/} |
| Attachment (will be made public) |

| We do not publicly disclose our investment policy documents |
| URL/Attachment |
| URL |

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

| Time horizon of your investment |
| URL/Attachment |
| URL |

<p>| Governance structure of organisational ESG responsibilities |
| URL/Attachment |
| URL |</p>
<table>
<thead>
<tr>
<th>URL</th>
<th>ESG incorporation approaches</th>
</tr>
</thead>
<tbody>
<tr>
<td>URL</td>
<td>Active ownership approaches</td>
</tr>
<tr>
<td>URL</td>
<td>Reporting</td>
</tr>
<tr>
<td>URL</td>
<td>Climate change</td>
</tr>
</tbody>
</table>

We do not publicly disclose any investment policy components
Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.

Yes

Describe your policy on managing potential conflicts of interest in the investment process.

We have two conflict of interest prevention policies: the general policy is on a FIM Group level and the complementary policy is related to our mutual fund activities.

The general policy addresses the following issues:
1. Conflicts of interest in offering investment services and mutual funds
2. Asset management, transmission of orders, and trading on own account
3. Mutual fund activity
4. Investment research
5. Personal business transactions
6. Compensation schemes and incentives
7. Secondary occupations of management and personnel members
8. Duty to disclose conflicts of interest

The complementary policy related to mutual fund activities defines the possible circumstances in mutual fund activity in which a conflict of interest may arise involving a significant risk directed at the interests of a mutual fund, non-UCITS fund, or one or more customers. It also sets the procedures to prevent and manage conflicts of interest: separation of operations, separate information systems, restricted user permissions, and access control.

No

Indicate if your organisation has a process for identifying and managing incidents that occur within portfolio companies.

Yes

Describe your process on managing incidents

We follow ESG controversies that occur in portfolio companies. We use external service provider to highlight controversies and their severity. Our ESG / responsible investing policy describes the process and options we have in place should those incidents happen.

Objectives and strategies

Indicate if your organisation has a process for identifying and managing incidents that occur within portfolio companies.

Yes

Describe your process on managing incidents

We follow ESG controversies that occur in portfolio companies. We use external service provider to highlight controversies and their severity. Our ESG / responsible investing policy describes the process and options we have in place should those incidents happen.
Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad-hoc basis
- It is not set/reviewed

Additional information. [Optional]

DECISION MAKING AND OBJECTIVES

The head of responsible investing draws up the proposals for responsible investing strategies and policies to the ESG Committee, which consists of the Head of ESG, the CIO, representatives of the alternative investments operation, the equity and fixed-income units, discretionary asset management and risk management. The most important policies are submitted to the wealth Management executive board for approval. The objectives and focus areas are defined for each calendar year. The decisions are mainly implemented within each unit that makes investment decisions by the portfolio managers as an integral part of investing. For certain strategies, the decisions are implemented by a person who specialises in responsible investing.

Governance and human resources

Indicate the internal and/or external roles used by your organisation, and indicate for each whether they have oversight and/or implementation responsibilities for responsible investment.

<table>
<thead>
<tr>
<th>Roles</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Board members or trustees</td>
</tr>
<tr>
<td>- Oversight/accountability for responsible investment</td>
</tr>
<tr>
<td>- Implementation of responsible investment</td>
</tr>
<tr>
<td>- No oversight/accountability or implementation responsibility for responsible investment</td>
</tr>
<tr>
<td>- Internal Roles (triggers other options)</td>
</tr>
</tbody>
</table>

Select from the below internal roles

- Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Other Chief-level staff or head of department, specify
  - Head of responsible Investing
☐ Oversight/accountability for responsible investment
☐ Implementation of responsible investment
☐ No oversight/accountability or implementation responsibility for responsible investment

☐ Portfolio managers
☐ Oversight/accountability for responsible investment
☐ Implementation of responsible investment
☐ No oversight/accountability or implementation responsibility for responsible investment

☐ Investment analysts
☐ Oversight/accountability for responsible investment
☐ Implementation of responsible investment
☐ No oversight/accountability or implementation responsibility for responsible investment

☐ Dedicated responsible investment staff
☐ Oversight/accountability for responsible investment
☐ Implementation of responsible investment
☐ No oversight/accountability or implementation responsibility for responsible investment

☐ Investor relations
☐ Other role, specify (1)
☐ Other role, specify (2)

☐ External managers or service providers
☐ Oversight/accountability for responsible investment
☐ Implementation of responsible investment
☐ No oversight/accountability or implementation responsibility for responsible investment

SG 07.2  For the roles for which you have RI oversight/accountability or implementation responsibilities, indicate how you execute these responsibilities.

The CIO has the ESG oversight role. He oversights everything that is related to investment process and investing, including ESG. He will be alerted by the head of responsible investing if there are breaches during the process. The Head of Responsible Investing is responsible for the implementation and oversighting of the ESG process. Some ESG strategies are executed by the head of responsible investing, but he oversights everything that is related to ESG. Oversighting is done for example observing daily working in the investment teams and running ESG reports to verify that ESG criterias are not breeched in funds and mandates. The portfolio managers are responsible for the day-to-day implementation of the ESG process in their respective funds.

SG 07.3  Indicate the number of dedicated responsible investment staff your organisation has.

Number

1

SG 07.4  Additional information. [Optional]

At FIM the ESG is truly put in place by the people who do the investment decision, ie the fund managers. This is how it should be. Now that a distinct ESG process is in place, the system operates well.
I confirm I have read and understood the Accountability tab for SG 07

Promoting responsible investment

<table>
<thead>
<tr>
<th>SG 09</th>
<th>Mandatory</th>
<th>Public</th>
<th>Core Assessed</th>
<th>PRI 4,5</th>
</tr>
</thead>
<tbody>
<tr>
<td>SG 09.1</td>
<td>Select the collaborative organisation and/or initiatives of which your organisation is a member or in which it participated during the reporting year, and the role you played.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Select all that apply

☑ Principles for Responsible Investment

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

☑ Basic
☐ Moderate
☐ Advanced

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

We have explained UNPRI in many instances, for example what principles actually include and how the principles can be used to guide the development of responsible investing in organisations.

☐ Asian Corporate Governance Association
☐ Australian Council of Superannuation Investors
☐ AFIC – La Commission ESG
☐ BVCA – Responsible Investment Advisory Board
☑ CDP Climate Change

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

☑ Basic
☐ Moderate
☐ Advanced

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

We have highlighted the importance of CDP in developing emission related data and targets in many instances.

☑ CDP Forests
Your organisation’s role in the initiative during the reporting period (see definitions)

- [x] Basic
- [ ] Moderate
- [ ] Advanced

CDP Water

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

- [x] Basic
- [ ] Moderate
- [ ] Advanced

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

We have highlighted the importance of CDP in developing water related data and targets in many instances.

- [ ] CFA Institute Centre for Financial Market Integrity
- [ ] Code for Responsible Investment in SA (CRISA)
- [ ] Code for Responsible Finance in the 21st Century
- [ ] Council of Institutional Investors (CII)
- [ ] Eumedion
- [ ] Extractive Industries Transparency Initiative (EITI)
- [ ] ESG Research Australia
- [ ] Invest Europe Responsible Investment Roundtable
- [ ] Global Investors Governance Network (GIGN)
- [ ] Global Impact Investing Network (GIIN)
- [ ] Global Real Estate Sustainability Benchmark (GRESB)
- [ ] Green Bond Principles
- [ ] Institutional Investors Group on Climate Change (IIGCC)
- [ ] Interfaith Center on Corporate Responsibility (ICCR)
- [ ] International Corporate Governance Network (ICGN)
- [ ] Investor Group on Climate Change, Australia/New Zealand (IGCC)
- [ ] International Integrated Reporting Council (IIRC)
- [ ] Investor Network on Climate Risk (INCR)/CERES
- [ ] Local Authority Pension Fund Forum
- [ ] Principles for Sustainable Insurance
- [x] Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify FINSIF, Finland’s Sustainable Investment Forum.
Your organisation’s role in the initiative during the reporting period (see definitions)

☐ Basic
☐ Moderate
☒ Advanced

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

We held two board position in FINSIF in 2018, (1 member and 1 chairman). Our role was very extensive in FINSIF operations, management and future planning.

☐ Responsible Finance Principles in Inclusive Finance
☐ Shareholder Association for Research and Education (Share)
☐ United Nations Environmental Program Finance Initiative (UNEP FI)
☐ United Nations Global Compact
☐ Other collaborative organisation/initiative, specify
☐ Other collaborative organisation/initiative, specify
☐ Other collaborative organisation/initiative, specify
☐ Other collaborative organisation/initiative, specify

SG 10 | Mandatory | Public | Core Assessed | PRI 4
---|---|---|---|---

SG 10.1 | Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.

☒ Yes

SG 10.2 | Indicate the actions your organisation has taken to promote responsible investment independently of collaborative initiatives. Provide a description of your role in contributing to the objectives of the selected action and the typical frequency of your participation/contribution.

☑ Provided or supported education or training programmes (this includes peer to peer RI support) Your education or training may be for clients, investment managers, actuaries, broker/dealers, investment consultants, legal advisers etc.)

Description

Head of Responsible was involved in several events with clients and potential clients where the concept of responsible investing was explained and discussed. Also, internal education on the topic was organised, as well as public comments in the media.
<table>
<thead>
<tr>
<th>Frequency of contribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑ Quarterly or more frequently</td>
</tr>
<tr>
<td>☑ Biannually</td>
</tr>
<tr>
<td>☑ Annually</td>
</tr>
<tr>
<td>☑ Less frequently than annually</td>
</tr>
<tr>
<td>☑ Ad hoc</td>
</tr>
<tr>
<td>☑ Other</td>
</tr>
</tbody>
</table>

- Provided financial support for academic or industry research on responsible investment
- Provided input and/or collaborated with academia on RI related work

<table>
<thead>
<tr>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>The head of responsible regularly participates in academic projects as an interviewee. This happened also several times in 2018.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Frequency of contribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑ Quarterly or more frequently</td>
</tr>
<tr>
<td>☑ Biannually</td>
</tr>
<tr>
<td>☑ Annually</td>
</tr>
<tr>
<td>☑ Less frequently than annually</td>
</tr>
<tr>
<td>☑ Ad hoc</td>
</tr>
<tr>
<td>☑ Other</td>
</tr>
</tbody>
</table>

- Encouraged better transparency and disclosure of responsible investment practices across the investment industry
- Spoke publicly at events and conferences to promote responsible investment

<table>
<thead>
<tr>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Head of Responsible Investing spoke for example in Institutional Investor conference in Copenhagen about responsible investing and appeared several newspapers and in other news media regularly.</td>
</tr>
</tbody>
</table>
Frequency of contribution

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

☐ Wrote and published in-house research papers on responsible investment
☐ Encouraged the adoption of the PRI
☐ Responded to RI related consultations by non-governmental organisations (OECD, FSB etc.)
☐ Wrote and published articles on responsible investment in the media
☐ A member of PRI advisory committees/working groups, specify
☐ On the Board of, or officially advising, other RI organisations (e.g. local SIFs)

Description

We had two FINSIF board members in 2018. Head of Responsible opened FINSIF annual seminar with a welcome speak.

Frequency of contribution

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

☐ Other, specify

☐ No

Outsourcing to fiduciary managers and investment consultants

<table>
<thead>
<tr>
<th>SG 12</th>
<th>Mandatory</th>
<th>Public</th>
<th>Core Assessed</th>
<th>PRI 4</th>
</tr>
</thead>
</table>

New selection options have been added to this indicator. Please review your prefilled responses carefully.

<table>
<thead>
<tr>
<th>SG 12.1</th>
<th>Indicate whether your organisation uses investment consultants.</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Yes, we use investment consultants</td>
<td></td>
</tr>
<tr>
<td>☒ No, we do not use investment consultants.</td>
<td></td>
</tr>
</tbody>
</table>

ESG issues in asset allocation
### SG 13
**Mandatory**

<table>
<thead>
<tr>
<th>SG 13.1</th>
<th>Indicate whether the organisation undertakes scenario analysis and/or modelling and provide a description of the scenario analysis (by asset class, sector, strategic asset allocation, etc.).</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Yes, to assess future ESG factors</td>
<td></td>
</tr>
<tr>
<td>☐ Yes, to assess future climate-related risks and opportunities</td>
<td></td>
</tr>
<tr>
<td>☒ No, not to assess future ESG/climate-related issues</td>
<td></td>
</tr>
</tbody>
</table>

### SG 13.3
**Additional information. [OPTIONAL]**

Climate change / ESG related scenario analysis is at such an early stage that we have not seen a great rationale to do this at this stage. Moreover, as the asset managers typically have tens or hundreds or even more portfolios, different scenario analyses are not as effective as they are in case of an asset owner with fewer, in many cases just one, portfolio.

---

### SG 14
**Mandatory to Report Voluntary to Disclose**

<table>
<thead>
<tr>
<th>SG 14.1</th>
<th>Some investment risks and opportunities arise as a result of long term trends. Indicate which of the following are considered.</th>
</tr>
</thead>
<tbody>
<tr>
<td>☒ Changing demographics</td>
<td></td>
</tr>
<tr>
<td>☒ Climate change</td>
<td></td>
</tr>
<tr>
<td>☒ Resource scarcity</td>
<td></td>
</tr>
<tr>
<td>☒ Technological developments</td>
<td></td>
</tr>
<tr>
<td>☐ Other, specify(1)</td>
<td></td>
</tr>
<tr>
<td>☐ Other, specify(2)</td>
<td></td>
</tr>
<tr>
<td>☐ None of the above</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SG 14.2</th>
<th>Indicate which of the following activities you have undertaken to respond to climate change risk and opportunity</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Established a climate change sensitive or climate change integrated asset allocation strategy</td>
<td></td>
</tr>
<tr>
<td>☐ Targeted low carbon or climate resilient investments</td>
<td></td>
</tr>
<tr>
<td>☐ Phase out your investments in your fossil fuel holdings</td>
<td></td>
</tr>
<tr>
<td>☒ Reduced portfolio exposure to emissions intensive or fossil fuel holdings</td>
<td></td>
</tr>
<tr>
<td>☒ Used emissions data or analysis to inform investment decision making</td>
<td></td>
</tr>
<tr>
<td>☐ Sought climate change integration by companies</td>
<td></td>
</tr>
<tr>
<td>☐ Sought climate supportive policy from governments</td>
<td></td>
</tr>
<tr>
<td>☐ Other, specify</td>
<td></td>
</tr>
<tr>
<td>☐ None of the above</td>
<td></td>
</tr>
</tbody>
</table>
Indicate which of the following tools the organisation uses to manage climate-related risks and opportunities.

- Scenario analysis
- Disclosures on emissions risks to clients/trustees/management/beneficiaries
- Encouraging internal and/or external portfolio managers to monitor emissions risks
- Emissions-risk monitoring and reporting are formalised into contracts when appointing managers
- Weighted average carbon intensity
- Carbon footprint (scope 1 and 2)
- Portfolio carbon footprint
- Total carbon emissions
- Carbon intensity
- Exposure to carbon-related assets
- Other emissions metrics
- Other, specify
- None of the above

If you selected disclosure on emissions risks, list any specific climate related disclosure tools or frameworks that you used.

For climate change related reasons, we exclude mining companies that derive over 20% of their revenues from thermal coal. Additionally, based on our own analysis, we exclude around 20 utilities whose energy generation’s CO2 intensity is high and that’s explained by the usage of coal as a fuel (we see gas ‘less bad’ at this point). Please note that we have calculated the intensity for the generation business, not for the company as a whole as that is misleading in some cases. When it comes to scenario analysis, we haven’t done that so far. We want the methods to develop further. When it comes to carbon footprint calculation, we calculate and report that in four different ways. The calculations are based on MSCI data on scope 1 and scope 2 emissions. We can report the carbon footprint as xx tons per invested million dollars, emissions owned xx tons CO2 (the share of companies’ emission owned by the fund, based on the ownership data), CO2 intensity xx (tons CO2 / mln $ sales) and weighted average CO2 intensity xx (tons CO2 / mln $ sales). Figures are available on our website for all the funds where data covers over 50% of investments. It is good to note that not all the methodologies mentioned are suitable for funds containing fixed income securities.

Describe how you address ESG issues for internally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.
<table>
<thead>
<tr>
<th>Asset Class</th>
<th>Describe what processes are in place and the outputs or outcomes achieved</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property</td>
<td>Sustainability is present in our property investments for example in the following ways. We prefer efficient construction management ie we prefer construction in a smaller area but higher buildings and therefore more apartments in chosen area. When choosing location of the construction, preference is given to those projects that have good access to public transportation. Buildings are new and energy efficient. Moreover, we prefer geothermal district heating with heat recovery option. Apartments built are equipped with technology to reduce water consumption.</td>
</tr>
<tr>
<td>Forestry</td>
<td>Sustainability is integral part of forest management at FIM. Certification plays an important part in sustainability practices and more than half of the forest owned is FSC certified, and 2/3 is PEFC certified. In addition to this, we prefer avoiding clearcutting when that's possible.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SG 17</th>
<th>Mandatory</th>
<th>Public</th>
<th>Descriptive</th>
<th>General</th>
</tr>
</thead>
<tbody>
<tr>
<td>SG 17.1</td>
<td>Describe how you address ESG issues for externally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Asset Class</th>
<th>Describe what processes are in place and the outputs or outcomes achieved</th>
</tr>
</thead>
<tbody>
<tr>
<td>Listed equities - ESG incorporation</td>
<td>As a prerequisite, we require external managers used to be UNPRI signatories. People who choose and make investments into funds managed by external managers, will do the check from public sources or directly from the external managers and proceed accordingly.</td>
</tr>
<tr>
<td>Listed equities - engagement</td>
<td>We don't currently engage with external managers on their engagement efforts.</td>
</tr>
<tr>
<td>Fixed income - Corporate (financial)</td>
<td>As a prerequisite, we require external managers used to be UNPRI signatories. People who choose and make investments into funds managed by external managers, will do the check from public sources or directly from the external managers and proceed accordingly.</td>
</tr>
<tr>
<td>Fixed income - Corporate (non-financial)</td>
<td>As a prerequisite, we require external managers used to be UNPRI signatories. People who choose and make investments into funds managed by external managers, will do the check from public sources or directly from the external managers and proceed accordingly.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Innovation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SG 18</td>
</tr>
<tr>
<td>SG 18.1</td>
</tr>
<tr>
<td>Yes</td>
</tr>
</tbody>
</table>
In October 2016, FIM launched a SIB partnership with the impact investing fund company Epiqus. As a part of this partnership, FIM and Epiqus are introducing a new way of investing to the Finnish market.

FIM's role in the project is to distribute a SIB that aims to enhance employment among immigrants in Finland.

We are currently working to introduce a new SIB that aims to improve children welfare.

We are leaders in impact investing in Finland.

☐ No

<table>
<thead>
<tr>
<th>SG 19</th>
<th>Mandatory</th>
<th>Public</th>
<th>Core Assessed</th>
<th>PRI 2, 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>SG 19.1</td>
<td>Indicate whether your organisation typically discloses asset class specific information proactively. Select the frequency of the disclosure to clients/beneficiaries and the public, and provide a URL to the public information.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Caution! The order in which asset classes are presented below has been updated in the online tool to match the Reporting Framework overview.

If you are transferring data from an offline document, please check your response carefully.

- Listed equity - Incorporation

<table>
<thead>
<tr>
<th>Do you disclose?</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ We do not proactively disclose it to the public and/or clients/beneficiaries</td>
</tr>
<tr>
<td>☐ We disclose to clients/beneficiaries only.</td>
</tr>
<tr>
<td>☑ We disclose it publicly</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>The information disclosed to clients/beneficiaries is the same</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Yes</td>
</tr>
<tr>
<td>☑ No</td>
</tr>
<tr>
<td>Disclosure to public and URL</td>
</tr>
<tr>
<td>-----------------------------</td>
</tr>
<tr>
<td>Disclosure to public and URL</td>
</tr>
<tr>
<td>☑ Broad approach to ESG incorporation</td>
</tr>
<tr>
<td>☑ Detailed explanation of ESG incorporation strategy used</td>
</tr>
<tr>
<td><strong>Frequency</strong></td>
</tr>
<tr>
<td>□ Quarterly or more frequently</td>
</tr>
<tr>
<td>□ Biannually</td>
</tr>
<tr>
<td>☑ Annually</td>
</tr>
<tr>
<td>□ Less frequently than annually</td>
</tr>
<tr>
<td>□ Ad-hoc/when requested</td>
</tr>
</tbody>
</table>

**URL**

[hyperlink:https://www.fim.com/fi/fim/vastuullinen-fim/]

**Listed equity - Engagement**

**Do you disclose?**

- ☑ We do not disclose to either clients/beneficiaries or the public.
- ☑ We disclose to clients/beneficiaries only.
- ☑ We disclose to the public

**Fixed income**

**Do you disclose?**

- ☑ We do not disclose to either clients/beneficiaries or the public.
- ☑ We disclose to clients/beneficiaries only.
- ☑ We disclose to the public

**The information disclosed to clients/beneficiaries is the same**

- ☑ Yes
- ☑ No
### Disclosure to public and URL

- Broad approach to RI incorporation
- Detailed explanation of RI incorporation strategy used

### Disclosure to clients/beneficiaries

- Broad approach to RI incorporation
- Detailed explanation of RI incorporation strategy used

### Frequency

- Quarterly
- Biannually
- Annually
- Less frequently than annually
- Ad hoc/when requested

### URL

[hyperlink:https://www.fim.com/fi/fim/vastuullinen-fim/]

---

**SG 19.2 Additional information [Optional]**

Reporting on engagement will commence during 2019 as described in the updated ESG policy.
FIM Asset Management

Reported Information

Public version

Direct - Listed Equity Incorporation

PRI disclaimer
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ESG incorporation strategy (select all that apply)

- [ ] Screening alone (i.e. not combined with any other strategies)
- [ ] Thematic alone (i.e. not combined with any other strategies)
- [ ] Integration alone (i.e. not combined with any other strategies)
- [x] Screening and integration strategies

<table>
<thead>
<tr>
<th>Percentage of active listed equity to which the strategy is applied</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>98</td>
</tr>
</tbody>
</table>

- [ ] Thematic and integration strategies
- [ ] Screening and thematic strategies
- [x] All three strategies combined

<table>
<thead>
<tr>
<th>Percentage of active listed equity to which the strategy is applied</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2</td>
</tr>
</tbody>
</table>

- [ ] We do not apply incorporation strategies

Total actively managed listed equities

100%

LEI 01.2 Describe your organisation’s approach to incorporation and the reasons for choosing the particular ESG incorporation strategy/strategies.

We consider responsible investing as part of our fiduciary duty. We find responsibility as a competition factor for companies. Responsibility assessment can provide information on the risks and opportunities that could potentially affect the company’s financial performance in the future, for example, through changes in sales or expenses. These impacts can be triggered by, among other things, changes in legislation or consumption habits that result from a phenomenon or activity associate with responsibility.

ESG integration refers to the consideration of ESG matters (environment, society and governance) in investment analysis and decision-making. Following the identification of substantial ESG issues, the purpose of ESG integration is to assess a company’s ability to take into consideration the risks and opportunities associated with these and to assess whether the price of the company’s securities reflect these factors.
Portfolio managers are supported in ESG integration by high-quality ESG assessments and ratings produced by third parties. We also collect ESG information ourselves, for example, discussing relevant responsibility issues in meetings with company management. Our portfolio managers meet company representatives on a daily basis. There are hundreds of meetings like these every year. In addition to assessments carried out by third parties, our country analysis utilises country-specific ESG factors included in our own country-risk model.

We are interested in the performance of our investments in terms of initiatives and principles concerning general international business practices and responsibility-related norms. We observe, for example, the UN Global Compact and the OECD Guidelines for Multinational Enterprises. The UN Global Compact contains principles related to human rights, labour and corruption. The human rights principles include the eradication of forced and child labour. We have access to comprehensive analysis and ratings by third parties. These help us to monitor the compliance of the companies we have invested in with international codes of practice. When considering an investment, our portfolio manager checks the company's compliance with international norms. If there are serious problems with compliance, we can start to engage, monitor the company or exclude it from our investment options. However, our priority is to improve the company's responsibility performance and the elimination of risks resulting from questionable activities. Screens that rely on external data and analysis, are run regularly in addition to the checks that are done before making a new investment.

FIM Biomed (FIM Rohto) is subject to the same norms-based screening and ESG integration as all other funds.

| LEI 01.3 | If assets are managed using a combination of ESG incorporation strategies, briefly describe how these combinations are used. [Optional] |

<table>
<thead>
<tr>
<th>LEI 04</th>
<th>Mandatory</th>
<th>Public</th>
<th>Descriptive</th>
<th>PRI 1</th>
</tr>
</thead>
<tbody>
<tr>
<td>LEI 04.1</td>
<td>Indicate and describe the type of screening you apply to your internally managed active listed equities.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Type of screening

☑ Negative/exclusionary screening

Screened by

☑ Product
☑ Activity
☐ Sector
☐ Country/geographic region
☑ Environmental and social practices and performance
☑ Corporate governance
Product and activity based exclusion. We exclude companies in certain clearly defined business segments from our direct investments. We do not invest in manufacturers of weapons prohibited by international treaties, including nuclear, biological and chemical weapons, cluster munitions and anti-personnel mines. We do not invest in producers of tobacco or cannabis products intended for recreational use either. We use external experts for identifying the companies that fall within the above categories. Based on our own analysis, we have excluded mining and power companies whose business is strongly coal-based. We exclude mining companies if coal used for energy production accounts for more than 20% of their turnover. In the case of electricity companies, we have first calculated the coal-intensity of their electricity production and then more carefully examined the source of the emissions of the most coal-intensive companies.

When it comes to companies’ ESG related practices and performance, exclusion can be made if there are serious problems in practices.

- Positive/best-in-class screening

Screened by
- Product
- Activity
- Sector
- Country/geographic region
- Environmental and social practices and performance
- Corporate governance

We have two funds where there are pre-set requirements on ESG rating. In these cases companies’ rating have to be above certain level.

- Norms-based screening

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

We use information provided by MSCI ESG Research to conduct the screening.
Describe how you notify clients and/or beneficiaries when changes are made to your screening criteria.

Screening criteria and principles are defined in our ESG policy. If the policy is updated, we will make the new information publicly available.

| LEI 05.1 | Indicate which processes your organisation uses to ensure screening is based on robust analysis. |
|-----------------------------------------------|
| □ Comprehensive ESG research is undertaken or sourced to determine companies’ activities and products. |
| □ Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies |
| □ External research and data used to identify companies to be excluded/included is subject to internal audit by ESG/RI staff, the internal audit function or similar |
| □ Third-party ESG ratings are updated regularly to ensure that portfolio holdings comply with fund policies. |
| □ Trading platforms blocking / restricting flagged securities on the black list |
| □ A committee or body with representatives independent of the individuals who conduct company research reviews some or all screening decisions |
| □ A periodic review of the quality of the research undertaken or provided is carried out |
| □ Review and evaluation of external research providers |
| □ Other, specify |
| □ None of the above |

| LEI 05.2 | Indicate the proportion of your actively managed listed equity portfolio that is subject to comprehensive ESG research as part your ESG screening strategy. |
|--------------|
| □ <10% |
| □ 10-50% |
| □ 51-90% |
| □ >90% |

| LEI 05.3 | Indicate how frequently third party ESG ratings are updated for screening purposes. |
|------------------------------------------------|
| □ Quarterly or more frequently |
| □ Bi-annually |
| □ Annually |
| □ Less frequently than annually |

| LEI 05.4 | Indicate how frequently you review internal research that builds your ESG screens. |
|------------------------------------------------|
| □ Quarterly or more frequently |
| □ Bi-annually |
| □ Annually |
| □ Less frequently than annually |
We compare ESG research providers offering from time to time for example in quality and quantity. We also supply feedback to service provider regularly on their research quality and other issues.

(B) Implementation: Thematic

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

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

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

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

Currently we have a fund that invests in pharmacy and pharmacy related companies. This is a thematic fund that invests in companies providing solutions for local and global healthcare issues.

(C) Implementation: Integration of ESG factors

LEI 08 | Mandatory | Public | Core Assessed | PRI 1
--- | --- | --- | --- | ---

**LEI 08.1** Indicate the ESG factors you systematically research as part of your investment analysis and the proportion of actively managed listed equity portfolios that is impacted by this analysis.
<table>
<thead>
<tr>
<th>ESG issues</th>
<th>Proportion impacted by analysis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environmental</td>
<td></td>
</tr>
<tr>
<td></td>
<td>○ &lt;10%</td>
</tr>
<tr>
<td></td>
<td>○ 10-50%</td>
</tr>
<tr>
<td></td>
<td>○ 51-90%</td>
</tr>
<tr>
<td></td>
<td>☑ &gt;90%</td>
</tr>
<tr>
<td>Social</td>
<td></td>
</tr>
<tr>
<td></td>
<td>○ &lt;10%</td>
</tr>
<tr>
<td></td>
<td>○ 10-50%</td>
</tr>
<tr>
<td></td>
<td>○ 51-90%</td>
</tr>
<tr>
<td></td>
<td>☑ &gt;90%</td>
</tr>
<tr>
<td>Corporate Governance</td>
<td></td>
</tr>
<tr>
<td></td>
<td>○ &lt;10%</td>
</tr>
<tr>
<td></td>
<td>○ 10-50%</td>
</tr>
<tr>
<td></td>
<td>○ 51-90%</td>
</tr>
<tr>
<td></td>
<td>☑ &gt;90%</td>
</tr>
</tbody>
</table>

**LEI 09**

<table>
<thead>
<tr>
<th>LEI 09.1</th>
<th>Indicate which processes your organisation uses to ensure ESG integration is based on a robust analysis.</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑</td>
<td>Comprehensive ESG research is undertaken or sourced to determine companies’ activities and products</td>
</tr>
<tr>
<td>☑</td>
<td>Companies are given the opportunity by you or your research provider to review ESG research on them</td>
</tr>
<tr>
<td></td>
<td>and correct inaccuracies</td>
</tr>
<tr>
<td>☑</td>
<td>Third-party ESG ratings are updated regularly.</td>
</tr>
<tr>
<td></td>
<td>☐ A periodic review of the internal research is carried out</td>
</tr>
<tr>
<td></td>
<td>☐ Structured, regular ESG specific meetings between responsible investment staff and the fund manager</td>
</tr>
<tr>
<td></td>
<td>or within the investments team</td>
</tr>
<tr>
<td>☑</td>
<td>ESG risk profile of a portfolio against benchmark</td>
</tr>
<tr>
<td>☐</td>
<td>Analysis of the impact of ESG factors on investment risk and return performance</td>
</tr>
<tr>
<td>☐</td>
<td>Other, specify</td>
</tr>
<tr>
<td>☐</td>
<td>None of the above</td>
</tr>
<tr>
<td>LEI 09.2</td>
<td>Indicate the proportion of your actively managed listed equity portfolio that is subject to comprehensive ESG research as part your integration strategy.</td>
</tr>
<tr>
<td>---------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>○ &lt;10%</td>
<td></td>
</tr>
<tr>
<td>○ 10-50%</td>
<td></td>
</tr>
<tr>
<td>○ 51-90%</td>
<td></td>
</tr>
<tr>
<td>☑ &gt;90%</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>LEI 09.3</th>
<th>Indicate how frequently third party ESG ratings that inform your ESG integration strategy are updated.</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑ Quarterly or more frequently</td>
<td></td>
</tr>
<tr>
<td>○ Bi-Annually</td>
<td></td>
</tr>
<tr>
<td>○ Annually</td>
<td></td>
</tr>
<tr>
<td>○ Less frequently than annually</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>LEI 09.5</th>
<th>Describe how ESG information is held and used by your portfolio managers.</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑ ESG information is held within centralised databases or tools and it is accessible by all relevant staff</td>
<td></td>
</tr>
<tr>
<td>☐ ESG information or analysis is a standard section or aspect of all company research notes or industry/sector analysis generated by investment staff</td>
<td></td>
</tr>
<tr>
<td>☐ Systematic records are kept that capture how ESG information and research was incorporated into investment decisions</td>
<td></td>
</tr>
<tr>
<td>☐ Other, specify</td>
<td></td>
</tr>
<tr>
<td>☐ None of the above</td>
<td></td>
</tr>
</tbody>
</table>
FIM Asset Management

Reported Information

Public version

Direct - Listed Equity Active Ownership

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### Overview

**LEA 01** | Mandatory | Public | Core Assessed | PRI 2
---|---|---|---|---

New selection options have been added to this indicator. Please review your prefilled responses carefully.

#### LEA 01.1
Indicate whether your organisation has an active ownership policy.

- Yes

#### LEA 01.2
Attach or provide a URL to your active ownership policy.

- Attachment provided:
- URL provided:

  **URL**
  
  {hyperlink:https://www.fim.com/fin/fim/vastuullinen-fim/}

#### LEA 01.3
Indicate what your active engagement policy covers:

**General approach to active ownership**

- Conflicts of interest
- Alignment with national stewardship code requirements
- Assets/funds covered by active ownership policy
- Expectations and objectives
- Engagement approach

**Engagement**

- ESG issues
- Prioritisation of engagement
- Method of engagement
- Transparency of engagement activities
- Due diligence and monitoring process
- Insider information
- Escalation strategies
- Service Provider specific criteria
- Other specify;
- (Proxy) voting approach
### Voting

- [x] ESG issues
- [x] Prioritisation and scope of voting activities
- [x] Methods of voting
- [x] Transparency of voting activities
- [x] Regional voting practice approaches
- [ ] Filing or co-filing resolutions
- [ ] Company dialogue pre/post-vote
- [ ] Decision-making processes
- [ ] Securities lending processes
- [ ] Other specify:
  - [ ] Other
  - [x] None of the above

- [ ] No

### LEA 01.4
**Do you outsource any of your active ownership activities to service providers?**

- [ ] Yes
- [x] No

### LEA 01.6
**Additional information [optional]**

Ownership policy was finished in Q4 2018. It will be put in practice in 2019. In 2018 we did not have voting activities.

### Engagement

#### LEA 02
**Mandatory**

<table>
<thead>
<tr>
<th>Public</th>
<th>Core Assessed</th>
<th>PRI 1,2,3</th>
</tr>
</thead>
</table>

#### LEA 02.1
Indicate the method of engagement, giving reasons for the interaction.
<table>
<thead>
<tr>
<th>Type of engagement</th>
<th>Reason for interaction</th>
</tr>
</thead>
<tbody>
<tr>
<td>Individual / Internal staff</td>
<td>☒ To influence corporate practice (or identify the need to influence) on ESG issues</td>
</tr>
<tr>
<td>engagements</td>
<td>☐ To encourage improved/increased ESG disclosure</td>
</tr>
<tr>
<td></td>
<td>☐ To gain an understanding of ESG strategy and/or management</td>
</tr>
<tr>
<td></td>
<td>☐ We do not engage via internal staff</td>
</tr>
<tr>
<td>Collaborative engagements</td>
<td>☒ To influence corporate practice (or identify the need to influence) on ESG issues</td>
</tr>
<tr>
<td></td>
<td>☒ To encourage improved/increased ESG disclosure</td>
</tr>
<tr>
<td></td>
<td>☒ To gain an understanding of ESG strategy and/or management</td>
</tr>
<tr>
<td></td>
<td>☐ We do not engage via collaborative engagements</td>
</tr>
<tr>
<td>Service provider engagements</td>
<td>☐ To influence corporate practice (or identify the need to influence) on ESG issues</td>
</tr>
<tr>
<td></td>
<td>☐ To encourage improved/increased ESG disclosure</td>
</tr>
<tr>
<td></td>
<td>☐ To gain an understanding of ESG strategy and/or management</td>
</tr>
<tr>
<td></td>
<td>☐ We do not engage via service providers</td>
</tr>
</tbody>
</table>

**LEA 02.4** Additional information. [Optional]

New ownership policy that combines engagement and voting activities was put in place at the end of 2018.

**LEA 03** Mandatory

New selection options have been added to this indicator. Please review your prefilled responses carefully.

**LEA 03.1** Indicate whether your organisation has a formal process for identifying and prioritising engagements.

© Yes

**LEA 03.2** Indicate the criteria used to identify and prioritise engagements for each type of engagement.
<table>
<thead>
<tr>
<th>Type of engagement</th>
<th>Criteria used to identify/prioritise engagements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Individual / Internal</td>
<td></td>
</tr>
<tr>
<td>engagements</td>
<td>□ Geography / market of the companies</td>
</tr>
<tr>
<td></td>
<td>□ Materiality of the ESG factors</td>
</tr>
<tr>
<td></td>
<td>□ Exposure (size of holdings)</td>
</tr>
<tr>
<td></td>
<td>□ Responses to ESG impacts that have already occurred</td>
</tr>
<tr>
<td></td>
<td>□ Responses to divestment pressure</td>
</tr>
<tr>
<td></td>
<td>□ Consultation with clients/beneficiaries</td>
</tr>
<tr>
<td></td>
<td>□ Consultation with other stakeholders (e.g. NGOs, trade unions, etc.)</td>
</tr>
<tr>
<td></td>
<td>□ Follow-up from a voting decision</td>
</tr>
<tr>
<td></td>
<td>□ Client request</td>
</tr>
<tr>
<td></td>
<td>□ Breaches of international norms</td>
</tr>
<tr>
<td></td>
<td>□ Other, specify</td>
</tr>
<tr>
<td></td>
<td>□ We do not outline engagement criteria for our individual engagements.</td>
</tr>
<tr>
<td>Collaborative engagements</td>
<td></td>
</tr>
<tr>
<td></td>
<td>□ Potential to enhance knowledge of ESG issues from other investors</td>
</tr>
<tr>
<td></td>
<td>□ Ability to have greater impact on ESG issues</td>
</tr>
<tr>
<td></td>
<td>□ Ability to add value to the collaboration</td>
</tr>
<tr>
<td></td>
<td>□ Geography/market of the companies targeted by the collaboration</td>
</tr>
<tr>
<td></td>
<td>□ Materiality of ESG factors addressed by the collaboration</td>
</tr>
<tr>
<td></td>
<td>□ Exposure (size of holdings) to companies targeted by the collaboration</td>
</tr>
<tr>
<td></td>
<td>□ Responses to ESG impacts addressed by the collaboration that have already occurred</td>
</tr>
<tr>
<td></td>
<td>□ Responses to divestment pressure</td>
</tr>
<tr>
<td></td>
<td>□ Follow-up from a voting decision</td>
</tr>
<tr>
<td></td>
<td>□ Alleviate the resource burden of engagement</td>
</tr>
<tr>
<td></td>
<td>□ Consultation with clients/beneficiaries</td>
</tr>
<tr>
<td></td>
<td>□ Consultation with other stakeholders (e.g. NGOs, trade unions, etc.)</td>
</tr>
<tr>
<td></td>
<td>□ Other, specify</td>
</tr>
<tr>
<td></td>
<td>□ We do not outline engagement criteria for our collaborative engagements.</td>
</tr>
</tbody>
</table>

☐ No

**LEA 04** | **Mandatory** | **Public** | **Core Assessed** | **PRI 2**

New selection options have been added to this indicator. Please review your prefilled responses carefully.

**LEA 04.1** | Indicate whether you define specific objectives for your organisation’s engagement activities.
| Individual / Internal engagements | ① All engagement activities  
| | ○ Majority of engagement activities  
| | ○ Minority of engagement activities  
| | ○ We do not define specific objectives for engagement activities carried out by internal staff. |
| Collaborative engagements | ① All engagement activities  
| | ○ Majority of engagement activities  
| | ○ Minority of engagement activities  
| | ○ We do not define specific objectives for engagement activities carried out through collaboration |

<table>
<thead>
<tr>
<th>LEA 05</th>
<th>Mandatory</th>
<th>Public</th>
<th>Core Assessed</th>
<th>PRI 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>LEA 05.1</td>
<td>Indicate if you monitor and/or review engagement outcomes.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| Individual / Internal engagements | ① Yes, in all cases  
| | ○ Yes, in majority of cases  
| | ○ Yes, in a minority of cases  
| | ○ We do not monitor, or review engagement outcomes carried out by our internal staff. |
| Collaborative engagements | ① Yes, in all cases  
| | ○ Yes, in a majority of cases  
| | ○ Yes, in a minority of cases  
| | ○ We do not monitor, or review engagement outcomes via collaborative engagement activities. |

<table>
<thead>
<tr>
<th>LEA 05.2</th>
<th>Indicate if you do any of the following to monitor and review the progress of engagement activities.</th>
</tr>
</thead>
</table>
| Individual / Internal staff engagements | ☐ Define timelines/milestones for your objectives  
| | ☑ Track and/or monitor progress against defined objectives and/or KPIs  
| | ☑ Track and/or monitor the progress of action taken when original objectives are not met  
| | ☑ Revisit and, if necessary, revise objectives on continuous basis  
| | ☐ Other; specify |
| Collaborative engagements | ☐ Define timelines/milestones for your objectives  
| | ☑ Track and/or monitor progress against defined objectives and/or KPIs  
| | ☐ Track and/or monitor the progress of action taken when original objectives are not met  
| | ☐ Revisit and, if necessary, revise objectives on continuous basis  
| | ☐ Other; specify |
LEA 05.3  Additional information [Optional]

New ownership policy was put in place at the end of 2018.

LEA 06  Mandatory  Public  Additional Assessed  PRI 2,4

LEA 06.1  Indicate whether your organisation has an escalation strategy when engagements are unsuccessful.

☐ Yes

LEA 06.2  Indicate the escalation strategies used at your organisation following unsuccessful engagements.

☐ Collaborating with other investors
☐ Issuing a public statement
☐ Filing/submitting a shareholder resolution
☐ Voting against the re-election of the relevant directors
☐ Voting against the board of directors or the the annual financial report
☐ Submitting nominations for election to the board
☐ Seeking legal remedy / litigation
☐ Reducing exposure (size of holdings)
☒ Divestment
☐ Other, specify

☐ No

LEA 06.3  Additional information. [Optional]

Most probable action after extensive failed engagement is divestment / exclusion.

LEA 08  Mandatory  Public  Gateway  PRI 2

LEA 08.1  Indicate if you track the number of your engagement activities.

<table>
<thead>
<tr>
<th>Type of engagement</th>
<th>Tracking engagements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Individual / Internal staff engagements</td>
<td>☒ Yes, we track the number of our engagements in full</td>
</tr>
<tr>
<td></td>
<td>☐ Yes, we partially track the number of our engagements</td>
</tr>
<tr>
<td></td>
<td>☐ We do not track</td>
</tr>
<tr>
<td>Collaborative engagements</td>
<td>☒ Yes, we track the number of our engagements in full</td>
</tr>
<tr>
<td></td>
<td>☐ Yes, we partially track the number of our engagements</td>
</tr>
<tr>
<td></td>
<td>☐ We do not track</td>
</tr>
</tbody>
</table>
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.
### ESG incorporation in actively managed fixed income

#### Implementation processes

<table>
<thead>
<tr>
<th>FI 01</th>
<th>Mandatory</th>
<th>Public</th>
<th>Gateway</th>
<th>PRI 1</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>FI 01.1</strong></td>
<td>Indicate (1) Which ESG incorporation strategy and/or combination of strategies you apply to your actively managed fixed income investments; and (2) The proportion (+/- 5%) of your total actively managed fixed income investments each strategy applies to.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SSA</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>-------------------------</td>
<td>------------------</td>
<td>------------------</td>
<td>------------------</td>
<td>------------------</td>
</tr>
<tr>
<td></td>
<td>Screening alone</td>
<td>Thematic alone</td>
<td>Integration alone</td>
<td>Screening + integration strategies</td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>100</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Thematic + integration strategies</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Screening + thematic strategies</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>All three strategies combined</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>No incorporation strategies applied</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0</td>
</tr>
<tr>
<td>Corporate (financial)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Screening alone</td>
<td>Thematic alone</td>
<td>Integration alone</td>
<td>Screening + integration strategies</td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>95</td>
</tr>
</tbody>
</table>

100%
<table>
<thead>
<tr>
<th>Strategy</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Thematic + integration strategies</td>
<td>0</td>
</tr>
<tr>
<td>Screening + thematic strategies</td>
<td>0</td>
</tr>
<tr>
<td>All three strategies combined</td>
<td>5</td>
</tr>
<tr>
<td>No incorporation strategies applied</td>
<td>0</td>
</tr>
</tbody>
</table>

100%
<table>
<thead>
<tr>
<th>Corporate (non-financial)</th>
<th>Screening alone</th>
<th>Thematic alone</th>
<th>Integration alone</th>
<th>Screening + integration strategies</th>
<th>Thematic + integration strategies</th>
<th>Screening + thematic strategies</th>
<th>All three strategies combined</th>
<th>No incorporation strategies applied</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>95</td>
<td>0</td>
<td>0</td>
<td>5</td>
<td>0</td>
</tr>
</tbody>
</table>

**FI 01.2** Describe your reasons for choosing a particular ESG incorporation strategy and how combinations of strategies are used.

We consider responsible investing as part of our fiduciary duty. Responsibility assessment can provide information on the risks and opportunities that could potentially affect the company's financial performance in the future, for example, through changes in sales or expenses. These impacts can be triggered by, among other things, changes in legislation or consumption habits that result from a phenomenon or activity associated with responsibility.

Following the identification of substantial ESG issues, the purpose of ESG integration is to assess a company's ability to take into consideration the risks and opportunities associated with these and to assess whether the price of the company's securities reflect these factors. Portfolio managers are supported in ESG integration by high-quality ESG assessments and ratings produced by third parties. In addition to assessments carried out by third parties, our country analysis utilises country-specific ESG factors included in our own country-risk model.

We are interested in the performance of our investments in terms of initiatives and principles concerning general international business practices and responsibility-related norms. We observe, for example, the UN Global Compact and the OECD Guidelines for Multinational Enterprises.
### FI 03.1 Indicate how you ensure that your ESG research process is robust:

- [ ] Comprehensive ESG research is undertaken internally to determine companies’ activities; and products and/or services
- [x] Issuers are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- [ ] Issuer information and/or ESG ratings are updated regularly to ensure ESG research is accurate
- [ ] Internal audits and regular reviews of ESG research are undertaken in a systematic way.
- [ ] A materiality/sustainability framework is created and regularly updated that includes all the key ESG risks and opportunities for each sector/country.
- [ ] Other, specify

**Specify description**

Conclusions of the research provider are continuously challenged internally among fund managers. Feedback is given to research provider to improve the quality of the research.

- [ ] None of the above

### FI 03.2 Describe how your ESG information or analysis is shared among your investment team.

- [x] ESG information is held within a centralised database and is accessible to all investment staff
- [ ] ESG information is displayed on front office research platforms
- [ ] ESG information is a standard item on all individual issuer summaries, research notes, ‘tear sheets’, or similar documents
- [ ] Investment staff are required to discuss ESG information on issuers as a standard item during investment committee meetings
- [ ] Records capture how ESG information and research was incorporated into investment decisions
- [ ] Other, specify
- [ ] None of the above

### (A) Implementation: Screening

#### FI 04 Indicate the type of screening you conduct.

Select all that apply
<table>
<thead>
<tr>
<th></th>
<th>SSA</th>
<th>Corporate (financial)</th>
<th>Corporate (non-financial)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Negative/exclusionary screening</td>
<td>☒</td>
<td>☒</td>
<td>☒</td>
</tr>
<tr>
<td>Positive/best-in-class screening</td>
<td>☐</td>
<td>☒</td>
<td>☒</td>
</tr>
<tr>
<td>Norms-based screening</td>
<td>☐</td>
<td>☒</td>
<td>☒</td>
</tr>
</tbody>
</table>

**FI 04.2** Describe your approach to screening for internally managed active fixed income

Screening doesn't differ too much between internally managed equity and fixed income asset classes. We screen corporate issuers for both exclusion strategy that covers all internal investments and do also norms-based screening. Latter is based in external service provider's analysis and classification, whereas the former is based on our internal exclusion list. However, majority of the items in the exclusion list are on the list because of the business involvement screening done by the ESG research provider. In SSA category, we run internal screening that ranks lowest scoring countries off from the investment universe. The scoring incorporates factors that relate to countries' social issues, among other things.

**FI 06.1** Indicate which systems your organisation has to ensure that fund screening criteria are not breached in fixed income investments.
<table>
<thead>
<tr>
<th>Type of screening</th>
<th>Checks</th>
</tr>
</thead>
</table>
| Negative/exclusionary screening?       | ☒ Analysis is performed to ensure that issuers meet screening criteria  
|                                       | ☒ We ensure that data used for the screening criteria is updated at least once a year.                     
|                                       | ☐ Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria  
|                                       | ☐ Audits of fund holdings are undertaken yearly by internal audit or compliance functions  
|                                       | ☐ Other, specify  
|                                       | ☐ None of the above                                                                                                                                 |
| Positive/best-in-class screening       | ☒ Analysis is performed to ensure that issuers meet screening criteria  
|                                       | ☒ We ensure that data used for the screening criteria is updated at least once a year.                     
|                                       | ☐ Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria  
|                                       | ☐ Audits of fund holdings are undertaken yearly by internal audit or compliance functions  
|                                       | ☐ Other, specify  
|                                       | ☐ None of the above                                                                                                                                 |
| Norms-based screening                  | ☒ Analysis is performed to ensure that issuers meet screening criteria  
|                                       | ☒ We ensure that data used for the screening criteria is updated at least once a year.                     
|                                       | ☐ Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria  
|                                       | ☐ Audits of fund holdings are undertaken yearly by internal audit or compliance functions  
|                                       | ☐ Other, specify  
|                                       | ☐ None of the above                                                                                                                          |

(B) Implementation: Thematic

<table>
<thead>
<tr>
<th>FI 07</th>
<th>Mandatory to Report Voluntary to Disclose</th>
<th>Public</th>
<th>Descriptive</th>
<th>PRI 1</th>
</tr>
</thead>
<tbody>
<tr>
<td>FI 07.1</td>
<td>Indicate what proportion of your thematic investments are:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>☒</td>
<td>Green/SDG bonds linked to environmental goals</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>☐</td>
<td>Social/SDG bonds linked to social goals</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>☐</td>
<td>Sustainability/SDG bonds (combination of green and social linked to multiple SDG categories)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>☐</td>
<td>Other</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

%  
100
Describe your organisation’s approach to thematic fixed income investing

Thematic fixed income investing is concentrated in a mutual fund that invests in greenbonds. We use MSCI ESG Research’s definition of greenbonds. The evaluation is based on green bond principles, but has some variations to that. Currently the fund invests at least 50% of its capital to greenbonds and the amount will probably increase over time as the greenbond market grows further. Also, currently the issuers are not spread evenly between sectors. That causes some limitations as the investment universe is somehow skewed.

Indicate whether you encourage transparency and disclosure relating to the issuance of themed bonds as per the Green Bonds Principles, Social Bond Principles, or Sustainability Bond Guidelines.

- We require that themed bond proceeds are only allocated to environmentally or socially beneficial projects
- We require the issuer (or 3rd party assurer) to demonstrate a process which determines the eligibility of projects to which themed bond proceeds are allocated
- We require issuers to demonstrate a systematic and transparent process of disbursing themed bond proceeds to eligible projects until all funds are allocated
- We require issuers to report at least once per year on the projects to which proceeds have been allocated including a description of those projects
- Other, specify
- None of the above

Describe the actions you take when issuers do not disburse bond proceeds as described in the offering documents.

If the issuer doesn't fulfill the obligations set out in the offering documents, it will most probable lose the greenbond status the third party we use had given to the bond. In this case the bond will be sold from the portfolio.

Indicate how you assess the environmental or social impact of your thematic investments.

- We require issuers to report at least once per year on specific environmental or social impacts resulting from our themed investments
- We ensure independent audits are conducted on the environmental or social impact of our investments
- We have a proprietary system to measure environmental and social impact
- We measure the impact of our themed bond investments on specific ESG factors such as carbon emissions or human rights
- Other, specify
- None of the above

The reporting requirement is part of the green bond classification criteria we use. This is where the requirement comes from.
**Fl 10.1** Describe your approach to integrating ESG into traditional financial analysis.

We consider ESG because we think we can increase financial return and/or improve risk-return ratio by doing this. We find responsibility as a competition factor for companies. RI staff has planned the integration process and made sure all the relevant tools are available for fund managers. Integrating ESG into traditional analysis starts with identification of relevant ESG risks and opportunities. Once the identification is done, we try to estimate how the company in question is prepared to take advantage of the opportunities and how the company is prepared to face the risks. Company’s strategy and/or risk management processes can shed more light on the company’s capability to tackle the negative issues and profit from the opportunities. Once the analysis is done, we try to estimate what consequences these might have for example on the costs and revenue. Also, depending on the financial health of the company in question, further analysis can be done on the balance sheet and capital structure etc. In many ways ESG consideration can be said to be more relevant if company’s financial health is poor, as such companies have less opportunities to cope with downside risks.

**Fl 10.2** Describe how your ESG integration approach is adapted to each of the different types of fixed income you invest in.

**SSA**

In sovereign space we have a proprietary model that ranks countries according to several data points. ESG related data points constitute one-third of the weight in the model. This information, in addition to countries’ ESG ratings are being used in investment decision.

**Corporate (financial)**

When analysing financial sector’s fixed income securities from ESG point of view, there is quite often information asymmetry present. Due to the nature of banks’ business, like bank secrecy, complicated financial structures, off-balance sheet items and possibly large loanbook pose challenges to evaluate banks properly. What can be done in analysing banks is to consider if they operate in geographical areas where there are elevated risks for money laundering and corruption. Also, as banks’ loanbooks can be large, it is important for us to be able to evaluate ESG risks that are actually in their loanbooks.

**Corporate (non-financial)**

ESG integration approach in corporate (non-financial) fixed income securities is very similar to the one done in equity side and resembles the description above at Fl 10.1

**Fl 11.1** Indicate how ESG information is typically used as part of your investment process.

Select all that apply
<table>
<thead>
<tr>
<th>ESG analysis is integrated into fundamental analysis</th>
<th>SSA</th>
<th>Corporate (financial)</th>
<th>Corporate (non-financial)</th>
</tr>
</thead>
<tbody>
<tr>
<td>ESG analysis is used to adjust the internal credit assessments of issuers.</td>
<td>☑</td>
<td>☑</td>
<td>☑</td>
</tr>
<tr>
<td>ESG analysis is used to adjust forecasted financials and future cash flow estimates.</td>
<td>☑</td>
<td>☑</td>
<td>☑</td>
</tr>
<tr>
<td>ESG analysis impacts the ranking of an issuer relative to a chosen peer group.</td>
<td>☑</td>
<td>☑</td>
<td>☑</td>
</tr>
<tr>
<td>An issuer's ESG bond spreads and its relative value versus its sector peers are analysed to find out if all risks are priced in.</td>
<td>☑</td>
<td>☑</td>
<td>☑</td>
</tr>
<tr>
<td>The impact of ESG analysis on bonds of an issuer with different durations/maturities are analysed.</td>
<td>☑</td>
<td>☑</td>
<td>☑</td>
</tr>
<tr>
<td>Sensitivity analysis and scenario analysis are applied to valuation models to compare the difference between base-case and ESG-integrated security valuation.</td>
<td>☑</td>
<td>☑</td>
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</tr>
<tr>
<td>ESG analysis is integrated into portfolio weighting decisions.</td>
<td>☑</td>
<td>☑</td>
<td>☑</td>
</tr>
<tr>
<td>Companies, sectors, countries and currency and monitored for changes in ESG exposure and for breaches of risk limits.</td>
<td>☑</td>
<td>☑</td>
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</tr>
<tr>
<td>The ESG profile of portfolios is examined for securities with high ESG risks and assessed relative to the ESG profile of a benchmark.</td>
<td>☑</td>
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</tr>
<tr>
<td>Other, specify</td>
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**FI 11.2** Additional information [OPTIONAL]

We can use ESG reports to compare ESG profiles of portfolios to other portfolios and benchmarks.

**FI 12** Mandatory Public Additional Assessed PRI 1

**FI 12.1** Indicate the extent to which ESG issues are reviewed in your integration process.
<table>
<thead>
<tr>
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<td>□ Systematically</td>
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<td>○ Occasionally</td>
<td>○ Occasionally</td>
<td>○ Occasionally</td>
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<td>○ Not at all</td>
<td>○ Not at all</td>
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<tr>
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<td>○ Occasionally</td>
<td>○ Occasionally</td>
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<tr>
<td></td>
<td>○ Not at all</td>
<td>○ Not at all</td>
<td>○ Not at all</td>
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<tr>
<td><strong>Corporate (non-financial)</strong></td>
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<td>□ Systematically</td>
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<td>○ Occasionally</td>
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<tr>
<td></td>
<td>○ Not at all</td>
<td>○ Not at all</td>
<td>○ Not at all</td>
</tr>
</tbody>
</table>

**FI 12.2** Please provide more detail on how you review E, S and/or G factors in your integration process.

**SSA**

In general, first step is to identify relevant ESG factors in each case. This can be done with the help of external ESG research and portfolio managers own knowledge on companies, countries and issues. After identifying relevant issues, it is the duty of fund managers to analyse how these factors might affect companies being analysed. In climate change related issues and if this is already reflected in the price of a bond or a share. We are introducing TCFD framework as a tool for systematic review.

**Corporate (financial)**

In general, first step is to identify relevant ESG factors in each case. This can be done with the help of external ESG research and portfolio managers own knowledge on companies, countries and issues. After identifying relevant issues, it is a duty of fund managers to analyse how these factors might affect companies being analysed. In climate change related issues and if this is already reflected in the price of a bond or a share. We are introducing TCFD framework as a tool for systematic review.

**Corporate (non-financial)**

In general, first step is to identify relevant ESG factors in each case. This can be done with the help of external ESG research and portfolio managers own knowledge on companies, countries and issues. After identifying relevant issues, it is a duty of fund managers to analyse how these factors might affect companies being analysed. In climate change related issues and if this is already reflected in the price of a bond or a share. We are introducing TCFD framework as a tool for systematic review.
FIM Asset Management

Reported Information

Public version

Confidence building measures

PRI disclaimer

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

### CM1 01

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<td><strong>CM1 01.1</strong></td>
<td>Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:</td>
<td></td>
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<tr>
<td></td>
<td>☐ Third party assurance over selected responses from this year’s PRI Transparency Report</td>
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<tr>
<td></td>
<td>☐ Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year</td>
<td></td>
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<tr>
<td></td>
<td>☐ Third party assurance or audit of the correct implementation of RI processes (that have been reported to the PRI this year)</td>
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<tr>
<td></td>
<td>☐ Internal audit of the correct implementation of RI processes and/or accuracy of RI data (that have been reported to the PRI this year)</td>
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<tr>
<td></td>
<td>☑ Internal verification of responses before submission to the PRI (e.g. by the CEO or the board)</td>
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<tr>
<td></td>
<td>☑ Whole PRI Transparency Report has been internally verified</td>
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<tr>
<td></td>
<td>☑ Selected data has been internally verified</td>
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<td>☑ Other, specify</td>
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<tr>
<td></td>
<td>☑ The PRI transparency report has been internally verified by the head of equities and head of fixed income.</td>
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<tr>
<td></td>
<td>☐ None of the above</td>
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</table>

### CM1 01.2

**Additional information [OPTIONAL]**

The PRI transparency report has been internally verified by the EVP, Head of Wealth Management, in addition to head of equities and head of fixed income.

### CM1 02

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<td><strong>CM1 02.1</strong></td>
<td>We undertook third party assurance on last year’s PRI Transparency Report</td>
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<tr>
<td></td>
<td>☑ Whole PRI Transparency Report was assured last year</td>
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<tr>
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<td>☑ Selected data was assured in last year’s PRI Transparency Report</td>
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<tr>
<td></td>
<td>☑ We did not assure last year’s PRI Transparency report</td>
<td></td>
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<tr>
<td></td>
<td>☐ None of the above, we were in our preparation year and did not report last year.</td>
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### CM1 03

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<td><strong>CM1 03.1</strong></td>
<td>We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:</td>
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<tr>
<td></td>
<td>☐ We adhere to an RI certification or labelling scheme</td>
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<tr>
<td></td>
<td>☐ 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</td>
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<tr>
<td></td>
<td>☐ ESG audit of holdings</td>
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<td><strong>CM1 04.1</strong></td>
<td>Do you plan to conduct third party assurance of this year's PRI Transparency report?</td>
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<td>○ Selected data will be assured</td>
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<tr>
<td>⚫ We do not plan to assure this year’s PRI Transparency report</td>
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<table>
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<td><strong>CM1 07.1</strong></td>
<td>Indicate who has reviewed/verified internally the whole - or selected data of the - PRI Transparency Report , and if this applies to selected data please specify what data was reviewed</td>
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**Who has conducted the verification**

☑ CEO or other Chief-Level staff

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<th>Sign-off or review of responses</th>
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<td></td>
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<tr>
<td>☑ Review of responses</td>
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□ The Board
□ Investment Committee
□ Compliance Function
□ RI/ESG Team
□ Investment Teams
□ Legal Department
□ Other (specify)

<table>
<thead>
<tr>
<th>CM1 07.2</th>
<th>Additional information [OPTIONAL]</th>
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C-level staff refers to EVP, Head of Wealth Management.