



PRIVATE TRANSPARENCY REPORT

2023

Cardano

Generated 15-12-2023

About this report

PRI reporting is the largest global reporting project on responsible investment. It was developed with investors, for investors.

PRI signatories are required to report publicly on their responsible investment activities each year. In turn, they receive a number of outputs, including a public and private Transparency Report.

The private Transparency Reports, which are produced using signatories' reported information, support signatories to have internal discussions about their practices. Signatories can also choose to make these available to clients, beneficiaries, and other stakeholders.

This private Transparency Report is an export of your responses to the PRI Reporting Framework during the 2023 reporting period. It includes all responses (public and private) to core and plus indicators.

In response to signatory feedback, the PRI has not summarised your responses – the information in this document is presented exactly as it was reported.

For each of the indicators in this document, all options that you selected are presented, including links and qualitative responses. In some indicators, all applicable options are included for additional context.

Disclaimers

Responsible investment definitions

Within the PRI Reporting Framework Glossary, we provide definitions for key terms to guide reporting on responsible investment practices in the Reporting Framework. These definitions may differ from those used or proposed by other authorities and regulatory bodies due to evolving industry perspectives and changing legislative landscapes. Users of this report should be aware of these variations, as they may impact interpretations of the information provided.

Data accuracy

This document presents information reported directly by signatories in the 2023 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented.

The PRI has taken reasonable action to ensure that data submitted by signatories in the reporting tool is reflected in their official PRI reports accurately. However, it is possible that small data inaccuracies and/or gaps remain, and the PRI shall not be responsible or liable for such inaccuracies and gaps.

Table of Contents

Module	Page
SENIOR LEADERSHIP STATEMENT (SLS)	4
ORGANISATIONAL OVERVIEW (OO)	8
POLICY, GOVERNANCE AND STRATEGY (PGS)	29
MANAGER SELECTION, APPOINTMENT AND MONITORING (SAM)	74
LISTED EQUITY (LE)	102
FIXED INCOME (FI)	112
SUSTAINABILITY OUTCOMES (SO)	124
CONFIDENCE-BUILDING MEASURES (CBM)	167

SENIOR LEADERSHIP STATEMENT (SLS)

SENIOR LEADERSHIP STATEMENT

SENIOR LEADERSHIP STATEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1	CORE	N/A	N/A	PUBLIC	Senior Leadership Statement	GENERAL

Section 1. Our commitment

- Why does your organisation engage in responsible investment?
- What is your organisation's overall approach to responsible investment, and what major responsible investment commitment(s) have you made?

Cardano believes that its clients' members and their dependents should enjoy a quality of life similar to or better than that possible at present. This should be in a sustainable and less polluted environment within a fairer society where they can enjoy financial security. We believe that current economic behaviour is putting the planet and society at risk. We believe that all investment activities have real-world impact, and as such, we should maximise our positive real-world sustainability impact and minimise our negative real-world sustainability impact. When we invest or advise, we follow a "double materiality" approach: we (1) maximise risk adjusted returns, which includes sustainability-related risks and opportunities while also (2) optimising our influence and impact, which considers the real-world sustainability impact of our investments. We believe that companies are better prepared for the future if they take ESG related risks into account. It is also our belief that the transition towards a sustainable society will speed up and that those that do not follow these developments eventually will lose. To achieve this transition, we have adopted a holistic and forward-thinking approach to all the companies and countries as we believe that a solid financial return can be achieved while at the same time a positive social impact can be realized.

Cardano manages to do this by focusing on material developments, such as the consequences of the growing world population and the increasing demand for energy, food and a place to live. As an active shareholder, we create impact by encouraging a change in behaviour among our investee companies. This can be achieved with a mixture of instruments: screening, engagement, voting, ESG integration, exclusion and impact investing. Each company and country is categorised within our sustainability framework. The categorisation determines the investment strategy a company or country fits in and the instruments we adopt to encourage companies to improve on their material sustainability topics. The basis for all our investments is that companies and countries have to comply with our socio-ethical investment principles, our Fundamental Investment Principles. These define the bottom-line of our investments and consider internationally agreed norms and conventions and a list of activities that are harmful to society. Companies and countries not complying with these principles are considered to be harmful or violate international standards and are excluded from all our investments. Secondly, we assess the capacity of the companies to prepare themselves for the transitions that are taking place or that are necessary to be able to operate within the planetary boundaries and respect the social foundations. The assessment shows whether companies have the adaptive capacity to mitigate the risks that the social and market changes caused by the sustainability transition bring about. For that, we not only look at how they currently operate, but especially follow a forward-looking approach considering strategies, targets and investment plans to prepare for the sustainability transitions. We have formulated a set of ambitions related to how companies deal with climate change, water scarcity, biodiversity loss, and materials use, and on how companies consider in their strategies the need to safeguard basic needs for the population, create a fairer society and maintain their license to operate. Companies scoring high on these topics, are allowed in our Sustainable Funds. Finally, we offer scalable investment solutions, predominantly in emerging and developing economies. This positive and measurable impact allows us to contribute, for instance, to contributing to the UN Sustainable Development Goals via our Impact Investing solutions. Next to the inclusion and exclusion of companies, we use other instruments to create an impact. For example, we conduct hundreds of engagement conversations each year to create an upward movement of companies and countries in Cardano's Sustainability Framework. Also, as shareholder, we vote in principle at all shareholders' meetings. When necessary, we submit our own resolutions. Further, we integrate ESG criteria into the investment process, in a relative company and/or country ESG score. The higher the score, the lower the risk; our portfolio managers have to realise a positive difference in ESG scores.

Section 2. Annual overview

- Discuss your organisation's progress during the reporting year on the responsible investment issue you consider most relevant or material to your organisation or its assets.
- Reflect on your performance with respect to your organisation's responsible investment objectives and targets during the reporting year. Details might include, for example, outlining your single most important achievement or describing your general progress on topics such as the following (where applicable):
 - refinement of ESG analysis and incorporation
 - stewardship activities with investees and/or with policymakers
 - collaborative engagements
 - attainment of responsible investment certifications and/or awards

In 2020 Cardano surpassed its Paris aligned climate target after which the investment policy was made more sustainable, by setting stricter and more targets. In our direct equity and credit portfolio, we aim to:

- Achieve net-zero greenhouse gas emissions across all assets under management at the latest by 2050, with intermediate targets to reach 50% emissions reduction by 2030 and 75% by 2040 compared to 2020, based on an average 7% annual greenhouse gas emissions reduction pathway in line with the IPCC's 1.5°C trajectory with limited overshoot. In 2022 our climate target has been approved by the Science Based Target initiative
- Achieve water neutrality by 2030, implying that businesses do not consume more water than nature can replenish.
- Reach net zero deforestation by 2030.

- Move towards a circular economy by 2050.

To work towards the targets, we engage with companies, vote at companies' AGMs, engage with policymakers, collaborate with our peers, participate in industry and NGO working groups. For our investment solutions, we select issuers that take steps to contribute to these objectives and also exclude issuers associated with significant negative impacts and/or the companies or sovereigns that are unable or unwilling to make the transition. A screening framework has been set up to evaluate the capacity of companies to make the transition.

A few outstanding engagement initiatives

- Cardano started a collaboration with geodata analytics firm Satelligence in 2019. By combining satellite images and Artificial Intelligence (AI), Satelligence provides Cardano with up-to-date information on deforestation incidents triggered by palm oil production. The cooperation enables Cardano to incorporate this data into its investment decisions and engagement conversations. In 2021, the initiative we started which involves twelve other investor organisations called - "Satellite-based engagement towards zero deforestation" won the Environmental Finance "ESG Engagement Initiative of the Year" award and was shortlisted for a PRI Stewardship award as well. In 2022, the collaboration extended the number of companies under engagement to also include Chinese companies who are more nascent to the topic. In 2022, we also deepened conversations with other target investees and sharpened our objectives, encouraging companies to provide outcomes of supplier engagements and pilot landscape projects, among others.
- In 2022 we actively participated in the Dutch Climate Coalition, which is a group of like-minded investors who support the objectives of the investor collaboration network of the Institutional Investors Group on Climate Change (IIGCC) and the Climate Action 100+ initiative. The objective of the group is to "encourage carbon intensive investee companies, with the greatest level of ambition and urgency possible, to implement transition pathways aligned with a below 2 degree Celsius, but preferably a 1.5°C, warming pathway". Cardano leads the engagement with Equinor within this group.

Voting approach

- We see voting as a central stewardship tool. The annual update to our voting policy is critical in ensuring our votes are cast in a way that encourages an ambitious pace of progress on sustainability topics by our investees. In 2022 we made several updates including the following: 1) Strengthening of voting guidelines on sustainability topics: More explicit about potential to vote against directors where there is lack of board oversight and or expertise on company's most relevant sustainability topics 2) Stipulation that we will vote against remuneration plans of energy companies that fail to integrate clear climate goals 3) Additional clarity on assessing relevance and strength of the sustainability metrics incorporated in the plans 4) For "Say-on-climate" votes we added specific elements of plans we want to see in order to support such proposals and 5) Remuneration: added text to be stricter in case of lack of transparency on sustainability links.

Policy engagement

- In 2022, we responded to seven public policy consultations, in the UK, EU and US, covering a range of sustainability topics including social risks and opportunities, climate change and stewardship. We see policy engagement as a natural extension of our sustainability commitments. We recognise the need to improve the sustainability of the market as-a-whole and that there are clear benefits to us and our clients through well-designed and implemented sustainable investment policy reform.

Highlights:

- o Open letter to the EU Commissioner on the Deforestation Regulation
- o Dutch Fund and Asset Management Association (DUFAS) expert group participation to provide input on evolving SFDR disclosure-related requirements
- o Taskforce for Nature-related Financial Disclosures (TNFD) feedback and support for further iterations of the framework
- o Support for IIGCC's engagement of the European Commission on the inclusion of nuclear and gas in the Taxonomy

Section 3. Next steps

- What specific steps has your organisation outlined to advance your commitment to responsible investment in the next two years?

At Cardano we are constantly searching for ways to advance our commitment to sustainable investments. The following activities are part of our strategic focus, for the next two years.

- We shall publish our biodiversity strategy and a series of thought leadership articles, detailing our strategic focus on biodiversity and the engagement, voting and screening approach we follow to encourage investee companies to bend the curve of biodiversity loss. Even though we acknowledge that biodiversity loss is a broad topic covering many different sectors and activities, our initial focus will be on companies contributing to biodiversity loss through deforestation, climate change and water pollution and overexploitation in the following sectors: food and staples retailing; food, beverages and tobacco; oil, gas and consumable fuels, utilities and chemicals. We will further elaborate our ongoing engagement programme where we use satellite data to prevent deforestation. We shall also initiate a next phase in the programme in which we test bio-acoustics to measure changes in biodiversity levels. In addition, we will be part of several collaborative engagements that focus on several of the drivers of biodiversity loss.
- Our climate-related engagements had a focus on the energy sector, discussing with oil & gas companies to step up their transition towards a renewable energy focused business model. In the coming years, the attention will shift to also include collaborative engagements on the energy demand side to work towards a net-zero society. We will initially focus on three priority sectors: chemicals, banks and utilities. We shall discuss with companies in these sectors ways to reduce their carbon footprint and the opportunities and risks related to the low-carbon transition.
- In order to have the maximum real-world impact possible, in our investment solutions we shall not only focus on those companies that are already sustainable. The largest real-world impact can be realized by assuring that companies invest in the transition towards a sustainable impact and by supporting innovative solutions to many of the global challenges. In our investment solutions and engagement and voting activities, we shall especially focus on this.
- We see policy engagement as a natural extension of our net zero and other commitments. We recognize the need to improve the sustainability of the market as a whole, to reduce systemic risks and to introduce policies that are supportive of the transition. To that end we will look for opportunities to respond and participate in policy consultations relevant to the corporates we invest in, and sustainable investment practices in the UK, Netherlands and Europe. We will offer our experience, expertise and insights where it is appropriate to do so.
- We shall publish a circular economy strategy, detailing our strategic focus on the need to make the economy more circular, both for reasons of sustainability as for economic reasons. In this strategy we shall provide details about how current, more linearly focused business models may create risks for companies and what economics and sustainability benefits a more circular business model that is based on principles of reduce, reuse and recycling of materials, may provide. We shall also detail how circularity considerations can be included in engagement, voting and screening.

Section 4. Endorsement

'The Senior Leadership Statement has been prepared and/or reviewed by the undersigned and reflects our organisation-wide commitment and approach to responsible investment'.

Name

Kerrin Rosenberg

Position

CEO, Cardano Investment UK - Director, Cardano Holdings - Member of Management Board

Organisation's Name

Cardano

○ A

'This endorsement applies only to the Senior Leadership Statement and should not be considered an endorsement of the information reported by the above-mentioned organisation in the various modules of the Reporting Framework.

The Senior Leadership Statement serves as a general overview of the above-mentioned organisation's responsible investment approach. The Senior Leadership Statement does not constitute advice and should not be relied upon as such. Further, it is not a substitute for the skill, judgement and experience of any third parties, their management, employees, advisors and/or clients when making investment and other business decisions'.

● B

The Senior Leadership Statement provides an overview of Cardano's sustainable investment approach. The information reported by Cardano has been reviewed by the Senior Leadership reflecting our approach to sustainability which is led from the top. The Statement does not constitute advice and should not be relied up as such

ORGANISATIONAL OVERVIEW (OO)

ORGANISATIONAL INFORMATION

REPORTING YEAR

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 1	CORE	N/A	N/A	PUBLIC	Reporting year	GENERAL

What is the year-end date of the 12-month period you have chosen to report for PRI reporting purposes?

	Date	Month	Year
Year-end date of the 12-month period for PRI reporting purposes:	31	12	2022

SUBSIDIARY INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2	CORE	N/A	OO 2.1	PUBLIC	Subsidiary information	GENERAL

Does your organisation have subsidiaries?

- (A) Yes
- (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2.1	CORE	OO 2	OO 2.2	PUBLIC	Subsidiary information	GENERAL

Are any of your organisation's subsidiaries PRI signatories in their own right?

- (A) Yes
- (B) No

ASSETS UNDER MANAGEMENT

ALL ASSET CLASSES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 4	CORE	OO 3	N/A	PUBLIC	All asset classes	GENERAL

What are your total assets under management (AUM) at the end of the reporting year, as indicated in [OO 1]?

USD

(A) AUM of your organisation, including subsidiaries, and excluding the AUM subject to execution, advisory, custody, or research advisory only

US\$ 50,535,237,367.00

(B) AUM of subsidiaries that are PRI signatories in their own right and excluded from this submission, as indicated in [OO 2.2]

US\$ 0.00

(C) AUM subject to execution, advisory, custody, or research advisory only

US\$ 37,971,518,908.00

Additional information on the exchange rate used: (Voluntary)

IMF exchange rate 23 december 2022 (last date in 2022) - EUR 1 = USD 1,06220

IMF exchange rate 23 december 2022 (last date in 2022) GBP 1 = USD 1,2068

ASSET BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5	CORE	OO 3	Multiple indicators	PRIVATE	Asset breakdown	GENERAL

Provide a percentage breakdown of your total AUM at the end of the reporting year as indicated in [OO 1].

	(1) Percentage of Internally managed AUM	(2) Percentage of Externally managed AUM
(A) Listed equity	24%	3.39%
(B) Fixed income	46%	1%
(C) Private equity	0%	1%
(D) Real estate	0%	0.3%
(E) Infrastructure	0%	0.01%
(F) Hedge funds	0%	0.3%
(G) Forestry	0%	0%
(H) Farmland	0%	0%
(I) Other	12%	12%
(J) Off-balance sheet	0%	0%

(I) Other - (1) Percentage of Internally managed AUM - Specify:

derivatives

(I) Other - (2) Percentage of Externally managed AUM - Specify:

cash funds

ASSET BREAKDOWN: EXTERNALLY MANAGED ASSETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.1	CORE	OO 5	Multiple	PRIVATE	Asset breakdown: Externally managed assets	GENERAL

Provide a further breakdown of your organisation's externally managed listed equity and/or fixed income AUM.

	(1) Listed equity	(2) Fixed income - SSA	(3) Fixed income - corporate	(4) Fixed income - securitised	(5) Fixed income - private debt
(A) Active	28%	0%	50%	0%	25%
(B) Passive	72%	19%	6%		

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.2	CORE	OO 5, OO 5.1	SAM 3, SAM 8	PRIVATE	Asset breakdown: Externally managed assets	GENERAL

Provide a breakdown of your organisation's externally managed AUM between segregated mandates and pooled funds or investments.

	(1) Segregated mandate(s)	(2) Pooled fund(s) or pooled investment(s)
(A) Listed equity - active	0%	100%
(B) Listed equity - passive	9%	91%
(C) Fixed income - active	53%	47%
(D) Fixed income - passive	0%	100%
(E) Private equity	0%	100%
(F) Real estate	0%	100%

(G) Infrastructure	0%	100%
(H) Hedge funds	0%	100%

ASSET BREAKDOWN: INTERNALLY MANAGED LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 LE	CORE	OO 5	Multiple	PRIVATE	Asset breakdown: Internally managed listed equity	GENERAL

Provide a further breakdown of your internally managed listed equity AUM.

(A) Passive equity 76%

(B) Active – quantitative 0%

(C) Active – fundamental 24%

(D) Other strategies 0%

ASSET BREAKDOWN: INTERNALLY MANAGED FIXED INCOME

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 FI	CORE	OO 5	Multiple	PRIVATE	Asset breakdown: Internally managed fixed income	GENERAL

Provide a further breakdown of your internally managed fixed income AUM.

(A) Passive – SSA 69%

(B) Passive – corporate 2%

(C) Active – SSA 15%

(D) Active – corporate 11%

(E) Securitised 0%

(F) Private debt 3%

MANAGEMENT BY PRI SIGNATORIES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 6	CORE	OO 5	N/A	PRIVATE	Management by PRI signatories	GENERAL

What percentage of your organisation's externally managed assets are managed by PRI signatories?

95%

GEOGRAPHICAL BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 7	CORE	Multiple, see guidance	N/A	PUBLIC	Geographical breakdown	GENERAL

How much of your AUM in each asset class is invested in emerging markets and developing economies?

AUM in Emerging Markets and Developing Economies

(A) Listed equity (2) >0 to 10%

(B) Fixed income – SSA (2) >0 to 10%

(C) Fixed income – corporate (3) >10 to 20%

(E) Fixed income – private debt (5) >30 to 40%

(F) Private equity (1) 0%

(G) Real estate	(1) 0%
(H) Infrastructure	(1) 0%
(I) Hedge funds	(5) >30 to 40%

STEWARDSHIP

STEWARDSHIP

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 8	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship	GENERAL

Does your organisation conduct stewardship activities, excluding (proxy) voting, for any of your assets?

	(1) Listed equity - active	(2) Listed equity - passive	(3) Fixed income - active	(4) Fixed income - passive	(5) Private equity
(A) Yes, through internal staff	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Yes, through service providers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Yes, through external managers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) We do not conduct stewardship	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	(6) Real estate	(7) Infrastructure	(8) Hedge funds	(11) Other
(A) Yes, through internal staff	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Yes, through service providers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(C) Yes, through external managers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(D) We do not conduct stewardship	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

STEWARDSHIP: (PROXY) VOTING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9 HF	CORE	OO 5	OO 9	PUBLIC	Stewardship: (Proxy) voting	GENERAL

Does your organisation have direct investments in listed equity across your hedge fund strategies?

- (A) Yes
- (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship: (Proxy) voting	GENERAL

Does your organisation conduct (proxy) voting activities for any of your listed equity holdings?

(1) Listed equity - active**(2) Listed equity - passive**

(A) Yes, through internal staff	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Yes, through service providers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Yes, through external managers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) We do not conduct (proxy) voting	<input type="radio"/>	<input type="radio"/>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9.1	CORE	OO 9	PGS 10.1, PGS 31	PUBLIC	Stewardship: (Proxy) voting	GENERAL

For each asset class, on what percentage of your listed equity holdings do you have the discretion to vote?

Percentage of your listed equity holdings over which you have the discretion to vote

(A) Listed equity – active	(10) >80 to 90%
(B) Listed equity - passive	(10) >80 to 90%

ESG INCORPORATION

INTERNALLY MANAGED ASSETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 11	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Internally managed assets	1

For each internally managed asset class, does your organisation incorporate ESG factors into your investment decisions?

	(1) Yes, we incorporate ESG factors into our investment decisions	(2) No, we do not incorporate ESG factors into our investment decisions
(A) Listed equity - passive	<input checked="" type="radio"/>	<input type="radio"/>
(C) Listed equity - active - fundamental	<input checked="" type="radio"/>	<input type="radio"/>
(E) Fixed income - SSA	<input checked="" type="radio"/>	<input type="radio"/>
(F) Fixed income - corporate	<input checked="" type="radio"/>	<input type="radio"/>
(H) Fixed income - private debt	<input checked="" type="radio"/>	<input type="radio"/>
(V) Other: derivatives	<input checked="" type="radio"/>	<input type="radio"/>

EXTERNAL MANAGER SELECTION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 12	CORE	OO 5, OO 5.1	Multiple indicators	PUBLIC	External manager selection	1

For each externally managed asset class, does your organisation incorporate ESG factors when selecting external investment managers?

	(1) Yes, we incorporate ESG factors when selecting external investment managers	(2) No, we do not incorporate ESG factors when selecting external investment managers
(A) Listed equity - active	<input checked="" type="radio"/>	<input type="radio"/>
(B) Listed equity - passive	<input checked="" type="radio"/>	<input type="radio"/>
(C) Fixed income - active	<input checked="" type="radio"/>	<input type="radio"/>
(D) Fixed income - passive	<input checked="" type="radio"/>	<input type="radio"/>
(E) Private equity	<input checked="" type="radio"/>	<input type="radio"/>
(F) Real estate	<input checked="" type="radio"/>	<input type="radio"/>
(G) Infrastructure	<input checked="" type="radio"/>	<input type="radio"/>
(H) Hedge funds	<input checked="" type="radio"/>	<input type="radio"/>
(K) Other: cash funds	<input checked="" type="radio"/>	<input type="radio"/>

EXTERNAL MANAGER APPOINTMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 13	CORE	OO 5, OO 5.1	Multiple indicators	PUBLIC	External manager appointment	1

For each externally managed asset class, does your organisation incorporate ESG factors when appointing external investment managers?

	(1) Yes, we incorporate ESG factors when appointing external investment managers	(2) No, we do not incorporate ESG factors when appointing external investment managers
(A) Listed equity - active	<input checked="" type="radio"/>	<input type="radio"/>
(B) Listed equity - passive	<input checked="" type="radio"/>	<input type="radio"/>
(C) Fixed income - active	<input checked="" type="radio"/>	<input type="radio"/>
(D) Fixed income - passive	<input checked="" type="radio"/>	<input type="radio"/>
(E) Private equity	<input checked="" type="radio"/>	<input type="radio"/>
(F) Real estate	<input checked="" type="radio"/>	<input type="radio"/>
(G) Infrastructure	<input checked="" type="radio"/>	<input type="radio"/>
(H) Hedge funds	<input checked="" type="radio"/>	<input type="radio"/>
(K) Other: cash funds	<input checked="" type="radio"/>	<input type="radio"/>

EXTERNAL MANAGER MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 14	CORE	OO 5, OO 5.1	Multiple indicators	PUBLIC	External manager monitoring	1

For each externally managed asset class, does your organisation incorporate ESG factors when monitoring external investment managers?

	(1) Yes, we incorporate ESG factors when monitoring external investment managers	(2) No, we do not incorporate ESG factors when monitoring external investment managers
(A) Listed equity - active	<input checked="" type="radio"/>	<input type="radio"/>
(B) Listed equity - passive	<input checked="" type="radio"/>	<input type="radio"/>
(C) Fixed income - active	<input checked="" type="radio"/>	<input type="radio"/>
(D) Fixed income - passive	<input checked="" type="radio"/>	<input type="radio"/>
(E) Private equity	<input checked="" type="radio"/>	<input type="radio"/>
(F) Real estate	<input checked="" type="radio"/>	<input type="radio"/>
(G) Infrastructure	<input checked="" type="radio"/>	<input type="radio"/>
(H) Hedge funds	<input checked="" type="radio"/>	<input type="radio"/>
(K) Other: cash funds	<input checked="" type="radio"/>	<input type="radio"/>

ESG IN OTHER ASSET CLASSES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 15	CORE	OO 11, OO 12–14	N/A	PUBLIC	ESG in other asset classes	1

Describe how your organisation incorporates ESG factors into the following asset classes.

Internally managed
(C) Other

We make extensive use of derivatives across different asset classes.

We have a “model of influence” that helps us consider how derivatives impact sustainability issues compared to other forms of investment eg. direct supply of new capital. The primary mode of influence is through “cost of capital” – derivatives do not allow influence typical with physical ownership such as voting and engagement. For this reason where possible we prefer physical exposures that allow us to maximise our influence. However many mandates require the use of derivatives so we use physical to the extent possible.

For index derivatives our preference would be to use derivatives that meet similar screening criteria to our physical exposure eg. exclusions of UNGC violators. We regularly scan the market for such derivatives to assess their liquidity vs more liquid alternatives eg. the S&P500 futures to see whether it is viable to substitute these. To date we find this is not the case, costs of transacting are too high and liquidity not enough for our purposes.

Where we use custom baskets these follow our usual stock selection process which includes extensive screening for ESG issues and Non-adapting/violators of our fundamental investment principle stocks are excluded from these baskets

Within commodity derivatives ESG considerations have lead to the exclusion of fossil fuel related derivatives and a focus on commodities that support long tem decarbonisation including carbon credits and futures on EU Carbon Allowances

Externally managed
(F) Other

We assess each of these asset classes, when used by clients, in the same manner we assess all other external manager positions. Please see response to SAM 3 for details of this process

ESG STRATEGIES

LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17 LE	CORE	OO 11	OO 17.1 LE, LE 12	PRIVATE	Listed equity	1

Which ESG incorporation approach and/or combination of approaches does your organisation apply to your internally managed active listed equity?

Percentage out of total internally managed active listed equity

(A) Screening alone	0%
(B) Thematic alone	0%
(C) Integration alone	0%
(D) Screening and integration	0%
(E) Thematic and integration	0%
(F) Screening and thematic	0%
(G) All three approaches combined	100%
(H) None	0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17.1 LE	CORE	OO 17 LE	LE 9	PRIVATE	Listed equity	1

What type of screening does your organisation use for your internally managed active listed equity assets where a screening approach is applied?

Percentage coverage out of your total listed equity assets where a screening approach is applied

(A) Positive/best-in-class screening only	0%
(B) Negative screening only	0%
(C) A combination of screening approaches	100%

FIXED INCOME

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17 FI	CORE	OO 5.3 FI, OO 11	Multiple, see guidance	PRIVATE	Fixed income	1

Which ESG incorporation approach and/or combination of approaches does your organisation apply to your internally managed active fixed income?

	(1) Fixed income - SSA	(2) Fixed income - corporate
(A) Screening alone	0%	0%
(B) Thematic alone	0%	0%
(C) Integration alone	0%	0%
(D) Screening and integration	0%	0%
(E) Thematic and integration	0%	0%
(F) Screening and thematic	0%	0%
(G) All three approaches combined	100%	100%
(H) None	0%	0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17.1 FI	CORE	OO 17 FI	N/A	PRIVATE	Fixed income	1

What type of screening does your organisation use for your internally managed active fixed income where a screening approach is applied?

	(1) Fixed income - SSA	(2) Fixed income - corporate
(A) Positive/best-in-class screening only	0%	0%
(B) Negative screening only	0%	0%
(C) A combination of screening approaches	100%	100%

ESG/SUSTAINABILITY FUNDS AND PRODUCTS

LABELLING AND MARKETING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18	CORE	OO 11–14	OO 18.1	PRIVATE	Labelling and marketing	1

Do you explicitly market any of your products and/or funds as ESG and/or sustainable?

(A) Yes, we market products and/or funds as ESG and/or sustainable

Provide the percentage of AUM that your ESG and/or sustainability-marketed products or funds represent:

100%

- (B) No, we do not offer products or funds explicitly marketed as ESG and/or sustainable
- (C) Not applicable; we do not offer products or funds

Additional information: (Voluntary)

All of our directly managed assets are subject to our sustainability processes.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18.1	CORE	OO 18	OO 18.2	PRIVATE	Labelling and marketing	1

Do any of your ESG and/or sustainability-marketed products and/or funds hold formal ESG and/or RI certification(s) or label(s) awarded by a third party?

(A) Yes, our ESG and/or sustainability-marketed products and/or funds hold formal labels or certifications

Provide the percentage of AUM that your labelled and/or certified products and/or funds represent:

100%

(B) No, our ESG and/or sustainability-marketed products and/or funds do not hold formal labels or certifications

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18.2	CORE	OO 18.1	N/A	PUBLIC	Labelling and marketing	1

Which ESG/RI certifications or labels do you hold?

- (A) Commodity type label (e.g. BCI)
- (B) GRESB**
- (C) Austrian Ecolabel (UZ49)
- (D) B Corporation
- (E) BREEAM
- (F) CBI Climate Bonds Standard
- (G) DDV-Nachhaltigkeitskodex-ESG-Strategie
- (H) DDV-Nachhaltigkeitskodex-ESG-Impact
- (I) EU Ecolabel
- (J) EU Green Bond Standard
- (K) Febelfin label (Belgium)
- (L) Finansol
- (M) FNG-Siegel Ecolabel (Germany, Austria and Switzerland)
- (N) Greenfin label (France)
- (O) Grüner Pfandbrief
- (P) ICMA Green Bond Principles**
- (Q) ICMA Social Bonds Principles**
- (R) ICMA Sustainability Bonds Principles**
- (S) ICMA Sustainability-linked Bonds Principles**
- (T) Kein Verstoß gegen Atomwaffensperrvertrag
- (U) Le label ISR (French government SRI label)
- (V) Luxflag Climate Finance
- (W) Luxflag Environment
- (X) Luxflag ESG
- (Y) Luxflag Green Bond
- (Z) Luxflag Microfinance
- (AA) Luxflag Sustainable Insurance Products
- (AB) National stewardship code**

Specify:

UK Stewardship Code

- (AC) Nordic Swan Ecolabel
- (AD) Other SRI label based on EUROSIF SRI Transparency Code (e.g. Novethic)
- (AE) People's Bank of China green bond guidelines
- (AF) RIAA (Australia)
- (AG) Towards Sustainability label (Belgium)
- (AH) Other

PASSIVE INVESTMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 19	CORE	OO 5.3 FI, OO 11	LE 8, FI 10	PRIVATE	Passive investments	1

What percentage of your total internally managed passive listed equity and/or fixed income passive AUM utilise an ESG index or benchmark?

Percentage of AUM that utilise an ESG index or benchmark

(A) Listed equity - passive 5%

(B) Fixed income - passive 0%

THEMATIC BONDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 20	CORE	OO 17 FI	FI 15, FI 17	PRIVATE	Thematic bonds	1

What percentage of your total environmental and/or social thematic bonds are labelled by the issuers in accordance with industry-recognised standards?

Percentage of your total environmental and/or social thematic bonds labelled by the issuers

(A) Green or climate bonds 60%

(B) Social bonds 10%

(C) Sustainability bonds 25%

(D) Sustainability-linked bonds	3%
(E) SDG or SDG-linked bonds	2%
(F) Other	0%
(G) Bonds not labelled by the issuer	0%

SUMMARY OF REPORTING REQUIREMENTS

SUMMARY OF REPORTING REQUIREMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 21	CORE	Multiple indicators	Multiple indicators	PUBLIC	Summary of reporting requirements	GENERAL

The following table shows which modules are mandatory or voluntary to report on in the separate PRI asset class modules. Where a module is voluntary, indicate if you wish to report on it.

Applicable modules	(1) Mandatory to report (pre-filled based on previous responses)	(2.1) Voluntary to report. Yes, I want to opt-in to reporting on the module	(2.2) Voluntary to report. No, I want to opt-out of reporting on the module
Policy, Governance and Strategy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Confidence Building Measures	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(A) Listed equity – passive	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(C) Listed equity – active – fundamental	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(E) Fixed income – SSA	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(F) Fixed income – corporate	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

(H) Fixed income – private debt	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(T) External manager selection, appointment and monitoring (SAM) – listed equity - active	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(U) External manager selection, appointment and monitoring (SAM) – listed equity - passive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(V) External manager selection, appointment and monitoring (SAM) – fixed income - active	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(W) External manager selection, appointment and monitoring (SAM) – fixed income - passive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(X) External manager selection, appointment and monitoring (SAM) – private equity	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(Y) External manager selection, appointment and monitoring (SAM) – real estate	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(Z) External manager selection, appointment and monitoring (SAM) – infrastructure	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(AA) External manager selection, appointment and monitoring (SAM) – hedge funds	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

SUBMISSION INFORMATION

REPORT DISCLOSURE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 32	CORE	OO 3, OO 31	N/A	PUBLIC	Report disclosure	GENERAL

How would you like to disclose the detailed percentage figures you reported throughout the Reporting Framework?

- (A) Publish as absolute numbers
- (B) Publish as ranges

POLICY, GOVERNANCE AND STRATEGY (PGS)

POLICY

RESPONSIBLE INVESTMENT POLICY ELEMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 1	CORE	OO 8, OO 9	Multiple indicators	PUBLIC	Responsible investment policy elements	1, 2

Which elements are covered in your formal responsible investment policy(ies)?

- (A) Overall approach to responsible investment
- (B) Guidelines on environmental factors
- (C) Guidelines on social factors
- (D) Guidelines on governance factors
- (E) Guidelines on sustainability outcomes
- (F) Guidelines tailored to the specific asset class(es) we hold
- (G) Guidelines on exclusions
- (H) Guidelines on managing conflicts of interest related to responsible investment
- (I) Stewardship: Guidelines on engagement with investees
- (J) Stewardship: Guidelines on overall political engagement
- (K) Stewardship: Guidelines on engagement with other key stakeholders
- (L) Stewardship: Guidelines on (proxy) voting
- (M) Other responsible investment elements not listed here
- (N) Our organisation does not have a formal responsible investment policy and/or our policy(ies) do not cover any responsible investment elements

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 2	CORE	PGS 1	Multiple, see guidance	PUBLIC	Responsible investment policy elements	1

Does your formal responsible investment policy(ies) include specific guidelines on systematic sustainability issues?

- (A) Specific guidelines on climate change (may be part of guidelines on environmental factors)
- (B) Specific guidelines on human rights (may be part of guidelines on social factors)
- (C) Specific guidelines on other systematic sustainability issues

Specify:

Several, including biodiversity, water and circular economy

- (D) Our formal responsible investment policy(ies) does not include guidelines on systematic sustainability issues

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 3	CORE	PGS 1, PGS 2	N/A	PUBLIC	Responsible investment policy elements	6

Which elements of your formal responsible investment policy(ies) are publicly available?

- (A) Overall approach to responsible investment

Add link:

<https://www.cardano.co.uk/wp-content/uploads/sites/3/2022/10/Cardano-ACTIAM-Sustainability-Policy.pdf>

- (B) Guidelines on environmental factors

Add link:

https://www.actiam.com/490770/siteassets/4_verantwoord/documenten/en/c-actiam-material-sustainability-drivers.pdf

- (C) Guidelines on social factors

Add link:

https://www.actiam.com/490770/siteassets/4_verantwoord/documenten/en/c-actiam-material-sustainability-drivers.pdf

- (D) Guidelines on governance factors

Add link:

https://www.actiam.com/490770/siteassets/4_verantwoord/documenten/en/c-actiam-material-sustainability-drivers.pdf

- (E) Guidelines on sustainability outcomes

Add link:

<https://www.cardano.co.uk/wp-content/uploads/sites/3/2022/10/Cardano-ACTIAM-Sustainability-Policy.pdf>

- (F) Specific guidelines on climate change (may be part of guidelines on environmental factors)

Add link:

https://www.actiam.com/490798/siteassets/4_verantwoord/documenten/en/actiam-climate-target-strategy.pdf

(G) Specific guidelines on human rights (may be part of guidelines on social factors)

Add link:

https://www.actiam.com/493af7/siteassets/4_verantwoord/documenten/en/b-actiam-fundamental-investment-principles.pdf

(H) Specific guidelines on other systematic sustainability issues

Add link:

https://www.cardano.co.uk/wp-content/uploads/sites/3/2023/07/Cardano-Biodiversity-Strategy-07.2023_v2.pdf

(I) Guidelines tailored to the specific asset class(es) we hold

Add link:

<https://www.cardano.co.uk/wp-content/uploads/sites/3/2022/10/Cardano-ACTIAM-Sustainability-Policy.pdf>

(J) Guidelines on exclusions

Add link:

<https://www.cardano.co.uk/wp-content/uploads/sites/3/2022/10/Cardano-ACTIAM-Sustainability-Policy.pdf>

(L) Stewardship: Guidelines on engagement with investees

Add link:

<https://www.cardano.co.uk/wp-content/uploads/sites/3/2022/09/Cardano-Stewardship-Report-April-2022.pdf>

(M) Stewardship: Guidelines on overall political engagement

Add link:

<https://www.cardano.co.uk/wp-content/uploads/sites/3/2022/09/Cardano-Stewardship-Report-April-2022.pdf>

(N) Stewardship: Guidelines on engagement with other key stakeholders

Add link:

<https://www.cardano.co.uk/wp-content/uploads/sites/3/2022/09/Cardano-Stewardship-Report-April-2022.pdf>

(O) Stewardship: Guidelines on (proxy) voting

Add link:

https://www.actiam.com/49445b/siteassets/4_verantwoord/documenten/en/responsible-investments_voting-policy.pdf

(Q) No elements of our formal responsible investment policy(ies) are publicly available

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 4	PLUS	PGS 1	N/A	PUBLIC	Responsible investment policy elements	1 – 6

Does your formal responsible investment policy(ies) identify a link between your responsible investment activities and your fiduciary duties or equivalent obligations?

(A) Yes

Elaborate:

Our policy includes our view on sustainability and financial performance, (see page 5, <https://www.cardano.co.uk/wp-content/uploads/sites/3/2022/10/Cardano-ACTIAM-Sustainability-Policy.pdf>).

We say, "We have reviewed the evidence base. Studies show that incorporating ESG issues into investment decision-making, and excluding certain companies or economic activities with unmanaged ESG risks, at worst leads to comparable results but at best, leads to superior risk-adjusted return."

- (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 5	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

Which elements are covered in your organisation’s policy(ies) or guidelines on stewardship?

- (A) Overall stewardship objectives
- (B) Prioritisation of specific ESG factors to be advanced via stewardship activities
- (C) Criteria used by our organisation to prioritise the investees, policy makers, key stakeholders, or other entities on which to focus our stewardship efforts
- (D) How different stewardship tools and activities are used across the organisation
- (E) Approach to escalation in stewardship
- (F) Approach to collaboration in stewardship
- (G) Conflicts of interest related to stewardship
- (H) How stewardship efforts and results are communicated across the organisation to feed into investment decision-making and vice versa
- (I) Other
- (J) None of the above elements is captured in our policy(ies) or guidelines on stewardship

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 6	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

Does your policy on (proxy) voting include voting principles and/or guidelines on specific ESG factors?

- (A) Yes, it includes voting principles and/or guidelines on specific environmental factors
- (B) Yes, it includes voting principles and/or guidelines on specific social factors
- (C) Yes, it includes voting principles and/or guidelines on specific governance factors
- (D) Our policy on (proxy) voting does not include voting principles or guidelines on specific ESG factors

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 7	CORE	OO 9	N/A	PUBLIC	Responsible investment policy elements	2

Does your organisation have a policy that states how (proxy) voting is addressed in your securities lending programme?

- (A) We have a publicly available policy to address (proxy) voting in our securities lending programme
- (B) We have a policy to address (proxy) voting in our securities lending programme, but it is not publicly available
- (C) We rely on the policy of our external service provider(s)
- (D) We do not have a policy to address (proxy) voting in our securities lending programme
- (E) Not applicable; we do not have a securities lending programme

RESPONSIBLE INVESTMENT POLICY COVERAGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 8	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy coverage	1

What percentage of your total AUM is covered by the below elements of your responsible investment policy(ies)?

Combined AUM coverage of all policy elements

(A) Overall approach to responsible investment	
(B) Guidelines on environmental factors	(7) 100%
(C) Guidelines on social factors	
(D) Guidelines on governance factors	

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 9	CORE	PGS 2	N/A	PUBLIC	Responsible investment policy coverage	1

What proportion of your AUM is covered by your formal policies or guidelines on climate change, human rights, or other systematic sustainability issues?

AUM coverage

(A) Specific guidelines on climate change

(1) for all of our AUM

(B) Specific guidelines on human rights

(1) for all of our AUM

(C) Specific guidelines on other systematic sustainability issues

(1) for all of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10	CORE	OO 8, OO 9, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

Per asset class, what percentage of your AUM is covered by your policy(ies) or guidelines on stewardship with investees?

(A) Listed equity

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%

(11) 100%

(B) Fixed income

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%

(11) 100%

(C) Private equity

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

(2) If your AUM coverage is below 100%, explain why: (Voluntary)

Our private equity investments are via our third-party managers, and so form part of our manager assessment.

(D) Real estate

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

(2) If your AUM coverage is below 100%, explain why: (Voluntary)

Our real estate investments are via our third-party managers, and so form part of our manager assessment.

(E) Infrastructure

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

(2) If your AUM coverage is below 100%, explain why: (Voluntary)

Our infrastructure investments are via our third-party managers, and so form part of our manager assessment.

(F) Hedge funds

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

(2) If your AUM coverage is below 100%, explain why: (Voluntary)

Our hedge funds investments are via our third-party managers, and so form part of our manager assessment.

(I) Other

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10.1	CORE	OO 9.1, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

What percentage of your listed equity holdings is covered by your guidelines on (proxy) voting?

(A) Actively managed listed equity

(1) Percentage of your listed equity holdings over which you have the discretion to vote

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

(B) Passively managed listed equity

(1) Percentage of your listed equity holdings over which you have the discretion to vote

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

GOVERNANCE

ROLES AND RESPONSIBILITIES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11	CORE	N/A	Multiple indicators	PUBLIC	Roles and responsibilities	1

Which senior level body(ies) or role(s) in your organisation have formal oversight over and accountability for responsible investment?

- (A) Board members, trustees, or equivalent
- (B) Senior executive-level staff, or equivalent

Specify:

CEO, CIO, heads of investment, head of sustainability

- (C) Investment committee, or equivalent

Specify:

There are three sustainability committees - our categorisation committee, which determines company sustainability categories and reviews company ESG analysis, our investment committee sustainability, which brings together our sustainability and investment teams, and our sustainability policy committee, chaired by our UK investment CEO which determines overall policy.

- (D) Head of department, or equivalent
- (E) None of the above bodies and roles have oversight over and accountability for responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.1	CORE	PGS 1, PGS 2, PGS 11	N/A	PUBLIC	Roles and responsibilities	1, 2

Does your organisation's senior level body(ies) or role(s) have formal oversight over and accountability for the elements covered in your responsible investment policy(ies)?

(1) Board members, trustees, or equivalent

(2) Senior executive-level staff, investment committee, head of department, or equivalent

(A) Overall approach to responsible investment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Guidelines on environmental, social and/or governance factors	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Guidelines on sustainability outcomes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) Specific guidelines on climate change (may be part of guidelines on environmental factors)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(E) Specific guidelines on human rights (may be part of guidelines on social factors)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(F) Specific guidelines on other systematic sustainability issues	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(G) Guidelines tailored to the specific asset class(es) we hold	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(H) Guidelines on exclusions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(J) Stewardship: Guidelines on engagement with investees	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(K) Stewardship: Guidelines on overall political engagement	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(L) Stewardship: Guidelines on engagement with other key stakeholders	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(M) Stewardship: Guidelines on (proxy) voting	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(N) This role has no formal oversight over and accountability for any of the above elements covered in our responsible investment policy(ies)

o

o

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.2	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1 – 6

Does your organisation have governance processes or structures to ensure that your overall political engagement is aligned with your commitment to the principles of PRI, including any political engagement conducted by third parties on your behalf?

(A) Yes

Describe how you do this:

Political engagement (such as policymaker engagement, policy consultations, membership groups and sign on letters) is managed day-to-day by our sustainability team, consistent with our sustainability policies, which are overseen by our sustainability policy committee, chaired by our UK investment CEO.

- (B) No
- (C) Not applicable, our organisation does not conduct any form of political engagement directly or through any third parties

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 12	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1

In your organisation, which internal or external roles are responsible for implementing your approach to responsible investment?

(A) Internal role(s)

Specify:

Our sustainability and investment teams are responsible for the implementation of our sustainability policies.

(B) External investment managers, service providers, or other external partners or suppliers

Specify:

All our external managers are subject to an annual ESG assessment. Where gaps are identified, we work with our external managers to make progress. Failure to do so, may result in a decision to end our investment.

- (C) We do not have any internal or external roles with responsibility for implementing responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 13	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

Does your organisation use responsible investment KPIs to evaluate the performance of your board members, trustees, or equivalent?

(A) Yes, we use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent

Describe: (Voluntary)

(B) No, we do not use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 14	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

Does your organisation use responsible investment KPIs to evaluate the performance of your senior executive-level staff (or equivalent), and are these KPIs linked to compensation?

(A) Yes, we use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

Indicate whether these responsible investment KPIs are linked to compensation

(1) KPIs are linked to compensation

(2) KPIs are not linked to compensation as these roles do not have variable compensation

(3) KPIs are not linked to compensation even though these roles have variable compensation

Describe: (Voluntary)

(B) No, we do not use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 15	PLUS	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

What responsible investment competencies do you regularly include in the training of senior-level body(ies) or role(s) in your organisation?

	(1) Board members, trustees or equivalent	(2) Senior executive-level staff, investment committee, head of department or equivalent
(A) Specific competence in climate change mitigation and adaptation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Specific competence in investors' responsibility to respect human rights	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Specific competence in other systematic sustainability issues	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) The regular training of this senior leadership role does not include any of the above responsible investment competencies	<input type="checkbox"/>	<input type="checkbox"/>

EXTERNAL REPORTING AND DISCLOSURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 16	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

What elements are included in your regular reporting to clients and/or beneficiaries for the majority of your AUM?

- (A) Any changes in policies related to responsible investment
- (B) Any changes in governance or oversight related to responsible investment
- (C) Stewardship-related commitments
- (D) Progress towards stewardship-related commitments
- (E) Climate-related commitments
- (F) Progress towards climate-related commitments
- (G) Human rights-related commitments
- (H) Progress towards human rights-related commitments
- (I) Commitments to other systematic sustainability issues
- (J) Progress towards commitments on other systematic sustainability issues
- (K) We do not include any of these elements in our regular reporting to clients and/or beneficiaries for the majority of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 17	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose climate-related information in line with the Task Force on Climate-Related Financial Disclosures' (TCFD) recommendations?

- (A) Yes, including all governance-related recommended disclosures
- (B) Yes, including all strategy-related recommended disclosures
- (C) Yes, including all risk management-related recommended disclosures
- (D) Yes, including all applicable metrics and targets-related recommended disclosures
- (E) None of the above

Add link(s):

<https://www.nowpensions.com/app/uploads/2022/10/tcfcd-report-np-d0286-final.pdf>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 18	PLUS	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, to which international responsible investment standards, frameworks, or regulations did your organisation report?

- (A) Disclosures against the European Union's Sustainable Finance Disclosure Regulation (SFDR)

Link to example of public disclosures

https://www.actiam.com/49f3ca/siteassets/4_verantwoord/documenten/en/principle-adverse-impact-statement.pdf

- (B) Disclosures against the European Union's Taxonomy

Link to example of public disclosures

https://www.actiam.com/4980b8/siteassets/6_fondsen/actiam-institutioneel/jaarverslagen/actiam_impact_euro_credit_fund_jaarverslag-2022.pdf

- (C) Disclosures against the CFA's ESG Disclosures Standard

- (D) Disclosures against other international standards, frameworks or regulations

Specify:

UK stewardship code

Link to example of public disclosures

https://www.frc.org.uk/getattachment/dc98fc57-9d7e-4a49-bebe-38bea92e86ef/CRML_Stewardship-Report_Final.pdf

- (E) Disclosures against other international standards, frameworks or regulations

Specify:

TCFD framework

Link to example of public disclosures

https://www.actiam.com/4980b8/siteassets/6_fondsen/actiam-institutioneel/jaarverslagen/actiam_impact_euro_credit_fund_jaarverslag-2022.pdf

- (F) Disclosures against other international standards, frameworks or regulations
- (G) Disclosures against other international standards, frameworks or regulations

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 19	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose its membership in and support for trade associations, think tanks or similar bodies that conduct any form of political engagement?

(A) Yes, we publicly disclosed our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement

Add link(s):

<https://www.cardano.co.uk/wp-content/uploads/sites/3/2022/10/Cardano-ACTIAM-Sustainability-Policy.pdf>

- (B) No, we did not publicly disclose our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
- (C) Not applicable, we were not members in or supporters of any trade associations, think tanks, or similar bodies that conduct any form of political engagement during the reporting year

STRATEGY

CAPITAL ALLOCATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 20	CORE	N/A	N/A	PUBLIC	Capital allocation	1

Which elements do your organisation-level exclusions cover?

- (A) Exclusions based on our organisation's values or beliefs regarding particular sectors, products or services
- (B) Exclusions based on our organisation's values or beliefs regarding particular regions or countries
- (C) Exclusions based on minimum standards of business practice aligned with international norms such as the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, UN Security Council sanctions or the UN Global Compact
- (D) Exclusions based on our organisation's climate change commitments
- (E) Other elements

Specify:

We assess whether companies are able and likely to contribute to the sustainability transitions underway, either through reducing negatives or accelerating positives. We look at how each company is exposed to risks, what their management capacity is to manage the risks, to reduce negative impacts and take advantage of opportunities to create positive impacts. If companies are classified as being non-adapting or at-risk by lacking the capacity to manage the transitions - we will not invest.

- (F) Not applicable; our organisation does not have any organisation-level exclusions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 21	CORE	N/A	N/A	PUBLIC	Capital allocation	1

How does your responsible investment approach influence your strategic asset allocation process?

(A) We incorporate ESG factors into our assessment of expected asset class risks and returns

Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation
- (2) for a majority of our AUM subject to strategic asset allocation**
- (3) for a minority of our AUM subject to strategic asset allocation

(B) We incorporate climate change–related risks and opportunities into our assessment of expected asset class risks and returns

Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation
- (2) for a majority of our AUM subject to strategic asset allocation**
- (3) for a minority of our AUM subject to strategic asset allocation

(C) We incorporate human rights–related risks and opportunities into our assessment of expected asset class risks and returns

(D) We incorporate risks and opportunities related to other systematic sustainability issues into our assessment of expected asset class risks and returns

Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation
- (2) for a majority of our AUM subject to strategic asset allocation
- (3) for a minority of our AUM subject to strategic asset allocation**

Specify: (Voluntary)

- (E) We do not incorporate ESG factors, climate change, human rights or other systematic sustainability issues into our assessment of expected asset class risks and returns
- (F) Not applicable; we do not have a strategic asset allocation process

STEWARDSHIP: OVERALL STEWARDSHIP STRATEGY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 22	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

For the majority of AUM within each asset class, which of the following best describes your primary stewardship objective?

	(1) Listed equity	(2) Fixed income	(3) Private equity	(4) Real estate	(5) Infrastructure	(6) Hedge funds
(A) Maximise our portfolio-level risk-adjusted returns. In doing so, we seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(B) Maximise our individual investments' risk-adjusted returns. In doing so, we do not seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 23	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

How does your organisation, or the external service providers or external managers acting on your behalf, prioritise the investees or other entities on which to focus its stewardship efforts?

The criteria we use to prioritise are stewardship efforts are:

- Size of our holding in the entity
- The systemic nature of the issue and how that affects our portfolio as a whole (e.g. climate change, biodiversity loss, inequality etc.)
- Our targets and goals including net zero, net zero deforestation, water neutrality, zero waste, and human rights related goals. We use stewardship as a primary tool to help reach these goals.
- The materiality of the ESG factor on operational and financial performance
- Input from clients
- Existing initiatives or collaborations
- Our ability to have an impact / add value

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Which of the following best describes your organisation's default position, or the position of the external service providers or external managers acting on your behalf, concerning collaborative stewardship efforts?

- (A) We recognise the value of collective action, and as a result, we prioritise collaborative stewardship efforts wherever possible
- (B) We collaborate on a case-by-case basis
- (C) Other
- (D) We do not join collaborative stewardship efforts

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24.1	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Elaborate on your organisation's default position on collaborative stewardship, or the position of the external service providers or external investment managers acting on your behalf, including any other details on your overall approach to collaboration.

Stewardship plays a central role in our strategy. We use our influence and collaborate to encourage companies to take further steps along their transition pathways. We believe that companies capable of effectively transitioning will have a distinct advantage. Companies pursuing strong governance and sustainable business models will lead to improved resilience and value creation over the long term. Our preferred approach for effective stewardship is to take be collaborative. Engagement is more efficient and impactful when investment managers collaborate, not just for the investors, but for the companies too who will field fewer, but higher conviction and higher quality, engagements from their investors. Collaboration allows us to share ideas, deepen engagements and leverage expertise and knowledge of peers and other stakeholders including NGOs and industry groups.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 25	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Rank the channels that are most important for your organisation in achieving its stewardship objectives.

- (A) Internal resources, e.g. stewardship team, investment team, ESG team, or staff
Select from the list:
 1
- (B) External investment managers, third-party operators and/or external property managers, if applicable
Select from the list:
 5
- (C) External paid specialist stewardship services (e.g. engagement overlay services or, in private markets, sustainability consultants) excluding investment managers, real assets third-party operators, or external property managers
Select from the list:
 3
- (D) Informal or unstructured collaborations with investors or other entities
Select from the list:
 4
- (E) Formal collaborative engagements, e.g. PRI-coordinated collaborative engagements, Climate Action 100+, or similar
Select from the list:
 2
- (F) We do not use any of these channels

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 26	PLUS	OO 8, OO 9, PGS 1	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

How does your organisation ensure that its policy on stewardship is implemented by the external service providers to which you have delegated stewardship activities?

- (A) Example(s) of measures taken when selecting external service providers:

We base our selection of external service providers on number of criteria including: governance structure, organisational stability, expertise and experience of the team, independence of the team conducting engagements, knowledge level of relevant ESG issues for specific companies, sectors and markets, knowledge level of relevant frameworks (TCFD, TNFD, OECD guidelines etc.), clarity of point of contact and transparency of communication on developments and changes. We also look at their processes and documentation of stewardship activities, openness to input, flexibility and responsiveness. The outsourced activities are evaluated on an annual basis.

☑ **(B) Example(s) of measures taken when designing engagement mandates and/or consultancy agreements for external service providers:**

We do not work with engagement mandates. Cardano builds its own initiatives, joins and participates in market initiatives, and leads several engagements, but also participates in engagement programs that are led and coordinated by the external provider. For the external provider, we provide significant input their program development both from a content and structure perspective. We provide input on the themes that are most relevant to us at a high level. We also provide more granular input on company level objectives and meeting agendas. It is important that we have full access to all communication between the external provider and the companies, as well as the possibility to participate in dialogues.

☑ **(C) Example(s) of measures taken when monitoring the stewardship activities of external service providers:**

Our sustainability policy guides our stewardship activities including our participation in those led by external providers. We have our own voting policy which is implemented as a custom policy by our external voting provider. There is a lengthy process to ensure our detailed voting guidelines are being implemented and applied appropriately. We monitor the implementation of our voting policy by the external provider through an annual analysis of a sample of voting recommendations for key votes throughout the season, as well as an annual review and audit of all votes assured by the external auditor.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 27	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

How are your organisation’s stewardship activities linked to your investment decision making, and vice versa?

All of our investment decisions are assessed according to our sustainability framework. We use an extensive set of data to assess each potential investment’s overall positive or negative contribution towards the sustainability transitions. We compliment the quantitative analysis with a rigorous qualitative overlay, to compliment and validate quantitative data. Every investment is then classified in our Transition Classification Framework (TCF) into a category describing its overall contribution to the transitions. This Transition Classification Framework defines the universe of investable positive impact, sustainable and adapting companies and investment instruments that are eligible for investment across our portfolios. It ensures that the universe meets minimum thresholds of financial ESG risk management and support for the transition towards a sustainable society. We expect that the largest future contribution to the transition, both environmentally and socially, comes from companies that are not yet fully sustainable today. We however need many of these to dramatically improve operations and replace harmful activities with sustainable operations before we can be sure that a sustainable future is even possible.

Stewardship plays a central role in this strategy. We use our influence and collaborate to encourage companies to take further steps along their transition pathways. We believe that companies capable of effectively transitioning will have a distinct advantage. Pursuing strong governance and sustainable business models will lead to improved resilience and value creation over the long term.

In this way we align our engagement priorities with the Environmental and Social transitions we identify using our framework for assessing investments:

Environmental

- Climate
- Biodiversity
- Water
- Materials

Social

- Basic Needs Provision
- A Fairer Society Transition
- Social License to Operate

Engagements that relate to a potential breach of the Fundamental Investment Principles, or a downgrade in categorisation due to insufficient adaptive capacity, may lead to exclusion. And vice versa: where the engagement is successful, and the company is not in our portfolios, it may lead to investment. We link engagement and voting activities together with investment decisions. Our observations made during engagements often inform our voting activities, and also decisions about exclusions and inclusions.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 28	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

If relevant, provide any further details on your organisation's overall stewardship strategy.

Our preferred approach for effective stewardship is as follows.

- Collaboration – engagement is more efficient and impactful when managers collaborate, not just for the investors, but for the companies too.
- Quality over quantity – we are interested in meaningful engagements, seeking tangible results.
- Long-term – we encourage long-term relationships with companies. Successful stewardship can take many months, maybe even years.
- Real world impact – we are interested in engagement on topics that contribute to positive real-world sustainability impact and address systemic issues and risks (such as, reduction in absolute carbon emissions and preventing biodiversity loss).
- Innovation – we encourage innovation, for example, our satellite-based engagement towards zero- deforestation.
- Integrated – stewardship contributes to investment decisions.
- Goal-oriented – we set objectives and work towards those; if progress is not meaningful we will consider escalation including voting against board members or changes in capital allocation.

- Transparency – some engagements, perhaps even many, will be unsuccessful.

• Use of multiple tools - Besides engagement, we also vote at virtually all AGMs where we own shares to communicate our sustainability views to hold boards accountable. We have a voting policy that details how we will vote at companies to promote better oversight of sustainability issues. The guidelines and expectations are linked to our Sustainability Policy. If needed, we initiate or support shareholder resolutions on actions necessary for a company to transition. We consider the co-filing of resolutions (filing in collaboration with other investors) to be one of the most effective forms of influence.

STEWARDSHIP: (PROXY) VOTING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 29	CORE	OO 9, PGS 1	N/A	PUBLIC	Stewardship: (Proxy) voting	2

When you use external service providers to give recommendations, how do you ensure those recommendations are consistent with your organisation's (proxy) voting policy?

(A) Before voting is executed, we review external service providers' voting recommendations for controversial and high-profile votes

Select from the below list:

- (1) in all cases
- (2) in a majority of cases
- (3) in a minority of cases**

(B) Before voting is executed, we review external service providers' voting recommendations where the application of our voting policy is unclear

Select from the below list:

- (1) in all cases**
- (2) in a majority of cases
- (3) in a minority of cases
- (D) We do not review external service providers' voting recommendations
- (E) Not applicable; we do not use external service providers to give voting recommendations

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 30	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

How is voting addressed in your securities lending programme?

- (A) We recall all securities for voting on all ballot items
- (B) When a vote is deemed important according to pre-established criteria (e.g. high stake in the company), we recall all our securities for voting
- (C) Other
- (D) We do not recall our securities for voting purposes
- (E) Not applicable; we do not have a securities lending programme**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 31	CORE	OO 9.1	N/A	PUBLIC	Stewardship: (Proxy) voting	2

For the majority of votes cast over which you have discretion to vote, which of the following best describes your decision making approach regarding shareholder resolutions (or that of your external service provider(s) if decision making is delegated to them)?

- (A) We vote in favour of resolutions expected to advance progress on our stewardship priorities, including affirming a company's good practice or prior commitment
- (B) We vote in favour of resolutions expected to advance progress on our stewardship priorities, but only if the investee company has not already publicly committed to the action(s) requested in the proposal
- (C) We vote in favour of shareholder resolutions only as an escalation measure
- (D) We vote in favour of the investee company management's recommendations by default
- (E) Not applicable; we do not vote on shareholder resolutions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 32	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

During the reporting year, how did your organisation, or your external service provider(s), pre-declare voting intentions prior to voting in annual general meetings (AGMs) or extraordinary general meetings (EGMs)?

- (A) We pre-declared our voting intentions publicly through the PRI's vote declaration system on the Resolution Database
- (B) We pre-declared our voting intentions publicly by other means, e.g. through our website
- (C) We privately communicated our voting decision to investee companies prior to the AGM/EGM
- (D) We did not privately or publicly communicate our voting intentions prior to the AGM/EGM
- (E) Not applicable; we did not cast any (proxy) votes during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 33	CORE	OO 9	PGS 33.1	PUBLIC	Stewardship: (Proxy) voting	2

After voting has taken place, do you publicly disclose your (proxy) voting decisions or those made on your behalf by your external service provider(s), company by company and in a central source?

- (A) Yes, for all (proxy) votes

Add link(s):

<https://www.actiam.com/en/sustainable-investments/instruments/>

- (B) Yes, for the majority of (proxy) votes
- (C) Yes, for a minority of (proxy) votes
- (D) No, we do not publicly report our (proxy) voting decisions company-by-company and in a central source

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 33.1	CORE	PGS 33	N/A	PUBLIC	Stewardship: (Proxy) voting	2

In the majority of cases, how soon after an investee's annual general meeting (AGM) or extraordinary general meeting (EGM) do you publish your voting decisions?

- (A) Within one month of the AGM/EGM
- (B) Within three months of the AGM/EGM
- (C) Within six months of the AGM/EGM
- (D) Within one year of the AGM/EGM
- (E) More than one year after the AGM/EGM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 34	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

After voting has taken place, did your organisation, and/or the external service provider(s) acting on your behalf, communicate the rationale for your voting decisions during the reporting year?

	(1) In cases where we abstained or voted against management recommendations	(2) In cases where we voted against an ESG-related shareholder resolution
(A) Yes, we publicly disclosed the rationale	(3) for a minority of votes	(3) for a minority of votes
(B) Yes, we privately communicated the rationale to the company	(3) for a minority of votes	(3) for a minority of votes

(C) We did not publicly or privately communicate the rationale, or we did not track this information

o

o

(D) Not applicable; we did not abstain or vote against management recommendations or ESG-related shareholder resolutions during the reporting year

o

o

(A) Yes, we publicly disclosed the rationale - Add link(s):

https://www.actiam.com/4a2855/siteassets/4_verantwoord/documenten/nl/2022-q2-kwartaalrapport-actiam-duurzaam-beleggen.pdf

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 35	PLUS	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

How does your organisation ensure vote confirmation, i.e. that your votes have been cast and counted correctly?

- We take the necessary steps to put PoA in place for markets where it is needed by working with our custodians and their provider Broadridge. For example, we have been working in 2022 with our custodian to change the structure of our funds at the sub-custodian in Brazil in order to be able to have a PoA in place.
- When votes are cast and we are alerted that special documentation is needed, we take the necessary steps. We did that for the Volkswagen meeting for example.
- Once a year we look at votes which were rejected to understand the reason and learn from it for the following year.

STEWARDSHIP: ESCALATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 36	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Escalation	2

For your listed equity holdings, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?

(1) Listed equity**(2) Direct listed equity holdings in
hedge fund portfolios**

(A) Joining or broadening an existing collaborative engagement or creating a new one	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(B) Filing, co-filing, and/or submitting a shareholder resolution or proposal	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(C) Publicly engaging the entity, e.g. signing an open letter	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(D) Voting against the re-election of one or more board directors	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(E) Voting against the chair of the board of directors, or equivalent, e.g. lead independent director	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(F) Divesting	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(G) Litigation	<input type="checkbox"/>	<input type="checkbox"/>
(H) Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(I) In the past three years, we did not use any of the above escalation measures for our listed equity holdings	<input type="radio"/>	<input checked="" type="radio"/>

(H) Other - (1) Listed equity - Specify:

Writing a letter of support for a derivatives claim against a company for mismanaging climate risks.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 37	CORE	Multiple, see guidance	N/A	PUBLIC	Stewardship: Escalation	2

For your corporate fixed income assets, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?

- (A) **Joining or broadening an existing collaborative engagement or creating a new one**
- (B) **Publicly engaging the entity, e.g. signing an open letter**
- (C) **Not investing**
- (D) Reducing exposure to the investee entity
- (E) **Divesting**
- (F) Litigation
- (G) Other
- (H) In the past three years, we did not use any of the above escalation measures for our corporate fixed income assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 38	PLUS	OO 8, OO 5.3 FI	N/A	PUBLIC	Stewardship: Escalation	2

Describe your approach to escalation for your internally managed SSA and/or private debt fixed income assets.

(A) SSA - Approach to escalation

it's on a case-by-case basis, depending on the asset, and sustainability issue.

(B) Private debt - Approach to escalation

In case of escalation, we consider the following actions:

- Work together with other investors and collectively engage with company
- Stop buy-and-hold strategy and do not re-invest/roll-over loan
- Work together with local authorities and institutions to address the issue
- Always consider amicable and responsible workout
- Pro-actively involved in discussion with investee as to help them to manage through restructuring

STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39	CORE	OO 8, OO 9	PGS 39.1, PGS 39.2	PUBLIC	Stewardship: Engagement with policy makers	2

Did your organisation, or the external investment managers or service providers acting on your behalf, engage with policy makers as part of your responsible investment approach during the reporting year?

- (A) Yes, we engaged with policy makers directly
- (B) Yes, we engaged with policy makers through the leadership of or active participation in working groups or collaborative initiatives, including via the PRI
- (C) Yes, we were members of, supported, or were in another way affiliated with third party organisations, including trade associations and non-profit organisations, that engage with policy makers, excluding the PRI
- (D) We did not engage with policy makers directly or indirectly during the reporting year beyond our membership in the PRI

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.1	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, what methods did you, or the external investment managers or service providers acting on your behalf, use to engage with policy makers as part of your responsible investment approach?

- (A) We participated in 'sign-on' letters
- (B) We responded to policy consultations
- (C) We provided technical input via government- or regulator-backed working groups

Describe:

In 2022, we participated in the Dutch Fund and Asset Management Association (DUFAS) SFDR Expert Group which involved stakeholders from Dutch investment management firms to provide input on evolving SFDR disclosure-related requirements. We provided our perspective on SFDR template consultations, EU Taxonomy requirements and, as well as fund classifications and definitions.

We participated in a roundtable discussion with the Netherlands Authority for the Financial Markets (Dutch: Autoriteit Financiële Markten (AFM)) where we provided insights about our perception of the SFDR article 8 and 9 fund templates and to give a detailed view on our interpretation of the requirements and how to address missing guidance.

- (D) We engaged policy makers on our own initiative
- (E) Other methods

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.2	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, did your organisation publicly disclose details of your engagement with policy makers conducted as part of your responsible investment approach, including through external investment managers or service providers?

- (A) We publicly disclosed all our policy positions
 - (B) We publicly disclosed details of our engagements with policy makers
- Add link(s):

<https://www.cardano.co.uk/public-policy-consultations/>

- (C) No, we did not publicly disclose details of our engagement with policy makers conducted as part of our responsible investment approach during the reporting year

STEWARDSHIP: EXAMPLES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 40	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Examples	2

Provide examples of stewardship activities that you conducted individually or collaboratively during the reporting year that contributed to desired changes in the investees, policy makers or other entities with which you interacted.

(A) Example 1:

Title of stewardship activity:

Co-filing resolution at 2022 AGM and engagement with Sainsbury's

- (1) Led by
 - (1) Internally led
 - (2) External service provider led
 - (3) Led by an external investment manager, real assets third-party operator and/or external property manager
- (2) Primary focus of stewardship activity
 - (1) Environmental factors
 - (2) Social factors
 - (3) Governance factors
- (3) Asset class(es)
 - (1) Listed equity
 - (2) Fixed income
 - (3) Private equity
 - (4) Real estate
 - (5) Infrastructure
 - (6) Hedge funds
 - (7) Forestry
 - (8) Farmland
 - (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

One recent and successful example of our stewardship activities is the co-filing of a resolution at UK supermarket Sainsbury's at their 2022 AGM.

It was the first living wage-related resolution in the UK and asked the company to become accredited as a Living Wage Employer with the UK living wage foundation. Accredited employers pay their direct employees the real living wages set by the foundation every year and they also commit to ensure that third party contractors receive the same rate.

This resolution was co-filed with the ShareAction Good Work Coalition, which engages companies to push for better working practices. The work of this coalition aligns with our sustainability framework and how we see the management of human capital as a sustainability driver. There is a strong business case to say that companies with strong labour rights, policies and practices, including the provision of a real living wage have a competitive advantage to attract and keep skilled employees. It also contributes to real world impact promoting a fairer and more inclusive society, particularly in the current cost of living crisis. The World

Economic Forum also identifies the cost-of-living crisis and increased inequality as a systemic risk. During our engagement discussions with Sainsbury's, the company announced a rise in its hourly rates for London based employees. As a result, in 2022 all Sainsbury's direct employees were receiving, at the minimum, the real living wage rates for that year. This announcement meant a pay rise for around 19,000 workers. Although the pay rise was a welcome commitment from Sainsbury, the group of co-filers decided to keep the resolution on the company's upcoming AGM agenda to signal that we are still looking at the company to become accredited with the foundation.

Accreditation means following the yearly rates set by the foundation, ensuring long-term security for all employees. It also commits the company to provide real living wage rates to their third-party contractors, which are a very vulnerable group of workers, for which we had very little data from Sainsbury's (number of such contracts used and their pay rates). It is also a strong signal to the market and the sector that as investor we expect companies to provide real living wage to their employees and subcontractors.

The resolution gathered 17% of shareholder support at the AGM. Although it may seem low, we still regard this as a success for two main reasons. It is not such a low percentage if we consider that it was the first resolution on the topic in the UK. A second success of the co-filing of the resolution at Sainsbury's is the acceleration of the dialogue we had with the company.

(B) Example 2:

Title of stewardship activity:

Oil and gas sector engagements

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

We have very few direct investments in the Oil and Gas sector, as we do not see the companies moving fast enough to decarbonise, nor are they implementing sufficiently ambitious climate transition plans. While the sector is starting to invest in developing renewables and low-carbon solutions, the rate and capacity at which they invest in these solutions is not at the pace we expect. In general there is little clarity on when companies in the sector will phase out of high emission fossil fuels production, presenting too large a risk to our portfolios and a significant impact on climate change.

While no company in the sector has demonstrated true Paris-alignment – also based on what external benchmarks such as the Climate Action 100+ and Transition Pathway Initiative find - there are a small minority that have more detailed plans and some ambition to move there. For now, these are the select few that we hold and also have engagements with, because there is the potential for them to transition and play a key role in providing for long term energy needs in a sustainable way.

Our goal with these engagements is to encourage - with the greatest level of ambition and urgency possible - the companies to implement transition pathways aligned with a 1.5°C warming pathway. We have held multiple dialogues with Repsol, Equinor and OMV in 2022 about their energy transition strategies and sent letters with our recommendations signed by multiple investors to their CEOs.

We acknowledge that there have been steps taken to align their strategies with the goal of limiting global warming to 1.5°C, by setting scope 1, 2 and 3 intensity emissions reduction targets for the short, medium and long-term, but their absolute reduction targets cover only scope 1 and 2. Absolute scope 3 reductions are key to achieving real- world impact on climate and managing it as systemic risk. We continue to press for progress on our objectives into 2023.

(C) Example 3:

Title of stewardship activity:

Open letter to the EU Commissioner on the Deforestation Regulation

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

To achieve our goal of net zero deforestation by 2030 across our portfolios and to increase impact, we look for ways in which to engage on the topic through multiple channels. Beyond the collaborative engagement programme that we initiated we also engaged at the policy level since broader regulation sets the “rules of the game” and encourages the market to move in the right direction.

In November 2022, we co-signed an open letter to the EU Commissioner about the inclusion of the financial sector in the Deforestation Regulation.

We felt it was of high importance that the EU Regulation on deforestation-free products includes due diligence obligations for financial institutions. By doing so, it ensures that the EU's efforts to stop deforestation worldwide are not weakened by enabling the financial industry to finance the same companies that would already be included in the Deforestation Regulation's scope.

(D) Example 4:

Title of stewardship activity:

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

(E) Example 5:

Title of stewardship activity:

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

CLIMATE CHANGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41	CORE	N/A	PGS 41.1	PUBLIC	Climate change	General

Has your organisation identified climate-related risks and opportunities affecting your investments?

(A) Yes, within our standard planning horizon

(B) Yes, beyond our standard planning horizon

Specify the risks and opportunities identified and your relevant standard planning horizon:

Cardano has formulated the target to be climate neutral at the latest by 2050, with intermediate targets for 2030 and 2040. In addition, in our screening, engagement and voting, we consider short, medium and long-term climate-related risks and opportunities. We make a distinction between the short and medium-term policy related risks related to regulatory change and changes in consumer preferences and market behaviour. We also consider the opportunities that those providing solutions for climate change may have. Finally, the medium to long-term physical climate-related risks are considered in our sustainability assessments. For this, we follow a forward-looking approach, not only considering what companies are doing at the moment, but also how they are preparing for expected stricter regulations or expected deterioration of physical climate impacts. With this, we follow a different planning horizon than portfolio managers use for financial analysis, not discounting away the expected long-term risks. After all, to mitigate longer-term risks, companies and countries should adapt short to medium term strategies and real-world impact can only be realized if companies make the transition now.

(C) No, we have not identified climate-related risks and/or opportunities affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41.1	CORE	PGS 41	N/A	PUBLIC	Climate change	General

Does your organisation integrate climate-related risks and opportunities affecting your investments in its overall investment strategy, financial planning and (if relevant) products?

(A) Yes, our overall investment strategy, financial planning and (if relevant) products integrate climate-related risks and opportunities

Describe how climate-related risks and opportunities have affected or are expected to affect your investment strategy, financial planning and (if relevant) products:

Climate-related risks and opportunities are an integral part of our sustainability framework, which is applied to our overall investment strategy and in all our products and services. For all investments, we not only monitor carbon emissions but also consider strategies and targets of companies to reduce climate-related risks or take climate-related opportunities. Companies and countries that are expected to have too high climate-related risks are not investable or we encourage them to step up their climate adaptation and mitigation efforts through our voting and engagements. We invest in high-quality engagement in order to improve the impact we have on company behaviour. In addition, we invest in high quality climate data and climate-related (scenario) analysis to obtain better insights in the climate-related risks and opportunities.

- (B) No, our organisation has not yet integrated climate-related risks and opportunities into its investment strategy, financial planning and (if relevant) products

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 42	PLUS	N/A	N/A	PUBLIC	Climate change	General

Which sectors are covered by your organisation’s strategy addressing high-emitting sectors?

(A) Coal

Describe your strategy:

Our climate strategy discusses how we intend to reach a complete phase out of coal activities in our portfolios at the latest by 2030. It also gives the pathway of thresholds for coal revenues above which companies are no longer investable.

(B) Gas

Describe your strategy:

Unconventional gas production is excluded from investments (shale gas and arctic drilling). Companies are evaluated on how they are making the transition towards renewable energy sources and whether they follow the required sectoral pathways towards climate neutrality. Even though gas is seen as a transition energy source, gas production companies are evaluated on how they take steps to reduce methane emissions during production, take steps to reduce their scope 3 emissions and take steps to make their infrastructure suitable for transport of hydrogen.

(C) Oil

Describe your strategy:

Unconventional oil production is excluded from investments. The oil sector is expected to make the transition towards renewable sources of energy. The majority of the companies in the oil sector is excluded because they do not pass our screening criteria. Oil companies are only investable if they make the necessary steps towards climate neutrality in line with the Paris Agreement. For this, we consider their strategies, targets, investments in renewables, the trend of their emissions and their efforts to reduce scope 3 emissions. Oil companies that are still investable are engaged by us, to encourage them to speed up their transition

(D) Utilities

Describe your strategy:

Coal-fired power plants are expected to be phased out at the latest by 2030. Companies investing in new coal-fired power plants are not investable. Utilities are among the priority sectors in our climate strategy. We assess whether they make the transition towards renewable sources of electricity fast enough. For this, we consider their strategies, targets, investment plans and the trends of their renewable electricity generation. We also consider whether networking companies make the necessary investments to make the grids suitable for renewable energy. Finally, the physical climate risks for utilities are expected to increase over the course of time, related to increased water stress and higher probabilities of extreme wind that may damage power lines and production facilities.

(E) Cement

Describe your strategy:

The construction materials sector is one of the priority sectors in our climate strategy. We evaluate to what extent cement companies are making the necessary investments to reduce the risks of stricter climate regulations. We especially consider whether they invest in CCS or in new, less carbon-intensive production methodologies. Only companies that are taking sufficient effort to reduce their emissions are investable.

(F) Steel

Describe your strategy:

The construction materials sector is one of the priority sectors in our climate strategy. We evaluate to what extent steel companies are making the necessary investments to reduce the risks of stricter climate regulations. We especially consider whether they invest in new, less carbon-intensive production methodologies (e.g. using hydrogen) or invest in steel recycling innovations. Only companies that are taking sufficient effort to reduce their emissions are investable.

(G) Aviation

Describe your strategy:

Airlines are one of the priority sectors in our climate strategy. Even though there are no suitable alternatives for kerosine for long-distance flights yet, we expect that airlines make efforts to invest in Sustainable Air Fuels or cleaner modes of transport. We also consider how airlines prepare themselves for expected changes in demand for short-distance flights.

(H) Heavy duty road

Describe your strategy:

The transportation sector is one of the priority sectors in our climate strategy. When assessing companies, we consider to what extent companies are making steps to improve energy efficiency of their fleet, through electrification, fuel cells or other new technologies. For this, we look at strategies, targets and investments in innovative modes of transport.

(I) Light duty road

Describe your strategy:

The transportation sector is one of the priority sectors in our climate strategy. When assessing companies, we consider to what extent companies are making steps to improve energy efficiency of their fleet, through electrification, fuel cells or other new technologies. For this, we look at strategies, targets and investments in innovative modes of transport.

(J) Shipping

Describe your strategy:

The transportation sector is one of the priority sectors in our climate strategy. When assessing companies, we consider to what extent companies are making steps to improve energy efficiency of their shipping fleet, through electrification, fuel cells or other new technologies. For this, we look at strategies, targets and investments in innovative modes of transport.

(K) Aluminium

Describe your strategy

The construction materials sector is one of the priority sectors in our climate strategy. We evaluate to what extent aluminium companies are making the necessary investments to reduce the risks of stricter climate regulations. We especially consider whether they invest in new, less carbon-intensive production methodologies (e.g. using hydrogen) or invest in aluminium recycling innovations. Only companies that are taking sufficient effort to reduce their emissions are investable.

(L) Agriculture, forestry, fishery

Describe your strategy:

Our climate strategy specifically considers that a substantial part of emissions is not caused by fossil fuel-related emissions, but related to land use change, deforestation or land/ocean use overexploitation. Our climate and biodiversity strategies describe in detail how we encourage companies to better consider land/ocean use related emissions and the importance of oceans and vegetation for sequestration.

(M) Chemicals

Describe your strategy:

The chemicals sector is one of the priority sectors of our climate strategy. For this sector, we especially consider to what extent they are taking steps to switch from fossil fuel-based to renewable feedstocks, to reduce emissions from methane and CFCs and to prepare for demand shifts from fossil-based to non-fossil-based products.

(N) Construction and buildings

Describe your strategy:

The construction materials sector is one of the priority sectors of our climate strategy. For the construction and real estate sectors, we specifically consider the steps they are taking to improve the energy efficiency of buildings and to switch towards more efficient construction materials

(O) Textile and leather

Describe your strategy:

The impacts of the textile and leather sectors are considered through our biodiversity strategy. This strategy considers the impacts of the livestock and agricultural sector on land use change, deforestation and carbon emissions. Both sectors are an integral part of our screening framework, in which we consider to what extent companies are taking steps to prepare for changes in demand and stricter climate-related regulations

(P) Water

Describe your strategy:

Our water, climate and biodiversity strategies consider the increasing risks of climate change for water availability. Not only increasing water stress but also increased probabilities of flooding and extreme rainfall are expected to influence many sectors. This will also impact the water utilities sector as it impacts the production of drinking water and the operation of sewerage systems. For this sector, it is considered whether companies are taking sufficient steps to prepare for the expected impacts of climate change. We specifically look at their strategies, targets and investment plans.

(Q) Other

- o (R) We do not have a strategy addressing high-emitting sectors

Provide a link(s) to your strategy(ies), if available

- https://www.cardano.co.uk/wp-content/uploads/sites/3/2023/07/Cardano-Biodiversity-Strategy-07.2023_v2.pdf
- https://www.actiam.com/490798/siteassets/4_verantwoord/documenten/en/actiam-climate-target-strategy.pdf
- https://www.actiam.com/490770/siteassets/4_verantwoord/documenten/en/c-actiam-material-sustainability-drivers.pdf

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 43	CORE	N/A	N/A	PUBLIC	Climate change	General

Has your organisation assessed the resilience of its investment strategy in different climate scenarios, including one in which the average temperature rise is held to below 2 degrees Celsius (preferably to 1.5 degrees Celsius) above pre-industrial levels?

- (A) Yes, using the Inevitable Policy Response Forecast Policy Scenario (FPS) or Required Policy Scenario (RPS)
- (B) Yes, using the One Earth Climate Model scenario
- (C) Yes, using the International Energy Agency (IEA) Net Zero scenario

(D) Yes, using other scenarios

Specify:

Cardano annually evaluates the climate-related risks for its portfolios based on a climate scenario analysis. For this, we make use of company-specific estimates of transition risks, physical risks and climate opportunities for several scenarios provided by our data provider MSCI. We make use of the 1.5, 2 and 3 degree scenarios and the orderly and disorderly NGFS climate scenarios. Based on this, we evaluate whether risks changes over the years and which companies or sectors cause the largest risks for our portfolios. Based on this, we evaluate to what extent our due diligence procedure needs to better incorporate expected future plans and strategies

- (E) No, we have not assessed the resilience of our investment strategy in different climate scenarios, including one that holds temperature rise to below 2 degrees

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 44	CORE	N/A	N/A	PUBLIC	Climate change	General

Does your organisation have a process to identify, assess, and manage the climate-related risks (potentially) affecting your investments?

(A) Yes, we have a process to identify and assess climate-related risks

(1) Describe your process

Identifying climate-related risks is an integral part of our due diligence procedure. Our climate strategy identifies what we expect companies to do to identify, assess and manage their climate-related risks. By evaluating their strategies, targets, greenhouse gas emissions performance and investment plans, we obtain insights in how well they manage their exposure to climate-related risks

(2) Describe how this process is integrated into your overall risk management

-

(B) Yes, we have a process to manage climate-related risks

(1) Describe your process

In our sustainability framework, all companies are categorized based on how they manage their exposure the ESG-related risks and opportunities. For climate-related risks and opportunities, thresholds have been formulated for a number of climate-related indicators – such as greenhouse gas emissions, greenhouse gas emissions intensity, management effort, and SBTi alignment – that are used to categorize companies. Only companies that are categorized sufficiently high, are investable in our investment solutions and fund ranges. This reduces the climate-related risks of our investments.

(2) Describe how this process is integrated into your overall risk management

-

- (C) No, we do not have any processes to identify, assess, or manage the climate-related risks affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 45	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, which of the following climate risk metrics or variables affecting your investments did your organisation use and disclose?

(A) Exposure to physical risk

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
- (1) Metric or variable used
 - (2) Metric or variable used and disclosed
 - (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://www.actiam.com/4980b8/siteassets/6_fondsen/actiam-institutioneel/jaarverslagen/actiam_beleggingsfondsen-i_jaarverslag_2022.pdf

(B) Exposure to transition risk

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
- (1) Metric or variable used
 - (2) Metric or variable used and disclosed
 - (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://www.actiam.com/4980b8/siteassets/6_fondsen/actiam-institutioneel/jaarverslagen/actiam_beleggingsfondsen-i_jaarverslag_2022.pdf

(C) Internal carbon price

(D) Total carbon emissions

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
- (1) Metric or variable used
 - (2) Metric or variable used and disclosed
 - (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://www.actiam.com/4980b8/siteassets/6_fondsen/actiam-institutioneel/jaarverslagen/actiam_beleggingsfondsen-i_jaarverslag_2022.pdf

(E) Weighted average carbon intensity

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
- (1) Metric or variable used
 - (2) Metric or variable used and disclosed
 - (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://www.actiam.com/4980b8/siteassets/6_fondsen/actiam-institutioneel/jaarverslagen/actiam_beleggingsfondsen-i_jaarverslag_2022.pdf

(F) Avoided emissions

(G) Implied Temperature Rise (ITR)

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
- (1) Metric or variable used
 - (2) Metric or variable used and disclosed
 - (3) Metric or variable used and disclosed, including methodology

(H) Non-ITR measure of portfolio alignment with UNFCCC Paris Agreement goals

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
 - (1) Metric or variable used
 - (2) Metric or variable used and disclosed
 - (3) Metric or variable used and disclosed, including methodology
- (I) Proportion of assets or other business activities aligned with climate-related opportunities
 - (1) Indicate whether this metric or variable was used and disclosed, including the methodology
 - (1) Metric or variable used
 - (2) Metric or variable used and disclosed
 - (3) Metric or variable used and disclosed, including methodology
 - (J) Other metrics or variables
 - (K) Our organisation did not use or disclose any climate risk metrics or variables affecting our investments during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 46	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, did your organisation disclose its Scope 1, Scope 2, and/or Scope 3 greenhouse gas emissions?

- (A) Scope 1 emissions
 - (1) Indicate whether this metric was disclosed, including the methodology
 - (1) Metric disclosed
 - (2) Metric and methodology disclosed
 - (2) Provide links to the disclosed metric and methodology, as applicable
 - https://www.actiam.com/4980b8/siteassets/6_fondsen/actiam-institutioneel/jaarverslagen/actiam_beleggingsfondsen-i_jaarverslag_2022.pdf
- (B) Scope 2 emissions
 - (1) Indicate whether this metric was disclosed, including the methodology
 - (1) Metric disclosed
 - (2) Metric and methodology disclosed
 - (2) Provide links to the disclosed metric and methodology, as applicable
 - https://www.actiam.com/4980b8/siteassets/6_fondsen/actiam-institutioneel/jaarverslagen/actiam_beleggingsfondsen-i_jaarverslag_2022.pdf
- (C) Scope 3 emissions (including financed emissions)
 - (1) Indicate whether this metric was disclosed, including the methodology
 - (1) Metric disclosed
 - (2) Metric and methodology disclosed
 - (2) Provide links to the disclosed metric and methodology, as applicable
 - https://www.actiam.com/4980b8/siteassets/6_fondsen/actiam-institutioneel/jaarverslagen/actiam_beleggingsfondsen-i_jaarverslag_2022.pdf

- (D) Our organisation did not disclose its Scope 1, Scope 2, or Scope 3 greenhouse gas emissions during the reporting year

SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47	CORE	N/A	Multiple indicators	PUBLIC	Sustainability outcomes	1, 2

Has your organisation identified the intended and unintended sustainability outcomes connected to its investment activities?

- (A) Yes, we have identified one or more specific sustainability outcomes connected to our investment activities
- (B) No, we have not yet identified the sustainability outcomes connected to any of our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.1	CORE	PGS 47	N/A	PUBLIC	Sustainability outcomes	1, 2

Which widely recognised frameworks has your organisation used to identify the intended and unintended sustainability outcomes connected to its investment activities?

- (A) The UN Sustainable Development Goals (SDGs) and targets
- (B) The UNFCCC Paris Agreement
- (C) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (D) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (E) The EU Taxonomy
- (F) Other relevant taxonomies
- (G) The International Bill of Human Rights
- (H) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (I) The Convention on Biological Diversity
- (J) Other international framework(s)

Specify:

our sustainable investment policies mention all international frameworks on the basis of which we assess the positive and negative sustainability outcomes of companies, this includes a large number of conventions on controversial weapons, labour rights, child labour, animal welfare, bribery and several environmental conventions ; see page 16 of www.actiam.com/493af7/siteassets/4_verantwoord/documenten/en/b-actiam-fundamental-investment-principles.pdf

- (K) Other regional framework(s)

Specify:

Principal Adverse Indicators as used in the EU SFDR

- (L) Other sectoral/issue-specific framework(s)

Specify:

our sustainable investment policies mention all international frameworks on the basis of which we assess the positive and negative sustainability outcomes of companies, this includes a large number of conventions on controversial weapons, labour rights, child labour, animal welfare, bribery and several environmental conventions ; see page 16 of www.actiam.com/493af7/siteassets/4_verantwoord/documenten/en/b-actiam-fundamental-investment-principles.pdf

- (M) Our organisation did not use any widely recognised frameworks to identify the intended and unintended sustainability outcomes connected to its investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.2	CORE	PGS 47	PGS 48	PUBLIC	Sustainability outcomes	1, 2

What are the primary methods that your organisation has used to determine the most important intended and unintended sustainability outcomes connected to its investment activities?

- (A) Identify sustainability outcomes that are closely linked to our core investment activities
- (B) Consult with key clients and/or beneficiaries to align with their priorities
- (C) Assess which actual or potential negative outcomes for people are most severe based on their scale, scope, and irremediable character
- (D) Identify sustainability outcomes that are closely linked to systematic sustainability issues
- (E) Analyse the input from different stakeholders (e.g. affected communities, civil society, trade unions or similar)
- (F) Understand the geographical relevance of specific sustainability outcome objectives
- (G) Other method
- (H) We have not yet determined the most important sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48	CORE	PGS 47.2	PGS 48.1, SO 1	PUBLIC	Sustainability outcomes	1, 2

Has your organisation taken action on any specific sustainability outcomes connected to its investment activities, including to prevent and mitigate actual and potential negative outcomes?

- (A) Yes, we have taken action on some of the specific sustainability outcomes connected to our investment activities
- (B) No, we have not yet taken action on any specific sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48.1	PLUS	PGS 48	N/A	PUBLIC	Sustainability outcomes	1, 2

Why has your organisation taken action on specific sustainability outcomes connected to its investment activities?

- (A) We believe that taking action on sustainability outcomes is relevant to our financial risks and returns over both short- and long-term horizons
- (B) We believe that taking action on sustainability outcomes, although not yet relevant to our financial risks and returns, will become so over a long-time horizon
- (C) We have been requested to do so by our clients and/or beneficiaries
- (D) We want to prepare for and respond to legal and regulatory developments that are increasingly addressing sustainability outcomes
- (E) We want to protect our reputation, particularly in the event of negative sustainability outcomes connected to investments
- (F) We want to enhance our social licence-to-operate (i.e. the trust of beneficiaries, clients, and other stakeholders)
- (G) We believe that taking action on sustainability outcomes in parallel to financial return goals has merit in its own right
- (H) Other

HUMAN RIGHTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49	PLUS	PGS 47	PGS 49.1	PUBLIC	Human rights	1, 2

During the reporting year, what steps did your organisation take to identify and take action on the actual and potentially negative outcomes for people connected to your investment activities?

- (A) We assessed the human rights context of our potential and/or existing investments and projected how this could connect our organisation to negative human rights outcomes

Explain how these activities were conducted:

Before investing in a company or country, we evaluate an issuer. This evaluation procedure starts with an assessment of the potential human rights violations of a company. We evaluate to what extent companies or countries are involved in human rights related controversies by considering to what extent they deal with for instance their own personnel, with local communities and indigenous people, potential involvement in child or forced labor or modern slavery, to what extent environmental controversies or spills may lead to human rights violations. Specifically for sovereigns, we evaluate their human rights policies and performance and exclude sovereigns that are related to human rights violations.

- (B) We assessed whether individuals at risk or already affected might be at heightened risk of harm

Explain how these activities were conducted:

When evaluating companies or countries, we also consider potential impacts on local communities and indigenous people. In addition, we evaluate to what extent issuers are involved in discrimination based on race, gender or other reasons.

(C) We consulted with individuals and groups who were at risk or already affected, their representatives and/or other relevant stakeholders such as human rights experts

Explain how these activities were conducted:

If necessary, we consult with NGOs specialised in arms trade (Pax), animal welfare, human rights (e.g. Greenpeace or Oxfam) or other NGOs to consult about the human rights related performance of individual companies.

(D) We took other steps to assess and manage the actual and potentially negative outcomes for people connected to our investment activities

(E) We did not identify and take action on the actual and potentially negative outcomes for people connected to any of our investment activities during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.1	PLUS	PGS 49	N/A	PUBLIC	Human rights	1, 2

During the reporting year, which stakeholder groups did your organisation include when identifying and taking action on the actual and potentially negative outcomes for people connected to your investment activities?

(A) Workers

Sector(s) for which each stakeholder group was included

- (1) Energy
- (2) Materials
- (3) Industrials
- (4) Consumer discretionary
- (5) Consumer staples
- (6) Healthcare
- (7) Finance
- (8) Information technology
- (9) Communication services
- (10) Utilities
- (11) Real estate

(B) Communities

Sector(s) for which each stakeholder group was included

- (1) Energy
- (2) Materials
- (3) Industrials
- (4) Consumer discretionary
- (5) Consumer staples
- (6) Healthcare
- (7) Finance
- (8) Information technology
- (9) Communication services
- (10) Utilities
- (11) Real estate

(C) Customers and end-users

Sector(s) for which each stakeholder group was included

- (1) Energy
- (2) Materials
- (3) Industrials
- (4) Consumer discretionary
- (5) Consumer staples
- (6) Healthcare
- (7) Finance
- (8) Information technology
- (9) Communication services
- (10) Utilities

- (11) Real estate
- (D) Other stakeholder groups

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.2	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

During the reporting year, what information sources did your organisation use to identify the actual and potentially negative outcomes for people connected to its investment activities?

(A) Corporate disclosures

Provide further detail on how your organisation used these information sources:

In our due diligence, we consider corporate disclosures such as annual reports and sustainability reports

(B) Media reports

Provide further detail on how your organisation used these information sources:

We monitor how the media report about our investee companies and whether they are involved in actual or potentially negative outcomes for people

(C) Reports and other information from NGOs and human rights institutions

Provide further detail on how your organisation used these information sources:

We regularly consult NGO reports that relate to our investment activities. Examples include reports from Global Canopy, Greenpeace, Oxfam, Carbon Tracker, World Animal Protection and Pax.

(D) Country reports, for example, by multilateral institutions, e.g. OECD, World Bank

Provide further detail on how your organisation used these information sources:

For our sovereign assessments, we consult several sources to obtain better insights in the way sovereigns handle the actual and potentially negative outcomes for people, including reports from the World Bank, IMF, and OECD.

(E) Data provider scores or benchmarks

Provide further detail on how your organisation used these information sources:

We use data from multiple data providers to identify the actual and potentially negative outcomes of our investments, including the outcomes for people

We use data from the Business & Human Rights Resource Center. If necessary, we also obtain information e.g. from Greenpeace and Oxfam about potential human rights violations

(F) Human rights violation alerts

Provide further detail on how your organisation used these information sources:

We use data from the Business & Human Rights Resource Center. If necessary, we also obtain information e.g. from Greenpeace and Oxfam about potential human rights violations

(G) Sell-side research

Provide further detail on how your organisation used these information sources:

Sell-side research is a useful tool to learn about how several companies within a sector consider impacts on people. This type of research helps to identify laggards and frontrunners.

(H) Investor networks or other investors

Provide further detail on how your organisation used these information sources:

Investor networks and other investors are a useful channel to learn about new and upcoming topics, to learn about new data sources and obtain new information on companies or sectors that may be related to negative outcomes to people.

(I) Information provided directly by affected stakeholders or their representatives

Provide further detail on how your organisation used these information sources:

We have a Grievance & Remedy policy that gives affected stakeholders the opportunity to directly approach us. So far, stakeholders have not contacted us directly, but there are examples of NGOs that approach us about involvement of some of our investee companies in human rights violations

(J) Social media analysis

(K) Other

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 50	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

During the reporting year, did your organisation, directly or through influence over investees, enable access to remedy for people affected by negative human rights outcomes connected to your investment activities?

(A) Yes, we enabled access to remedy directly for people affected by negative human rights outcomes we caused or contributed to through our investment activities

Describe:

Our Grievance & Remedy policy allows stakeholders to contact us, such that we can use our influence to assure that negative human rights outcomes caused by our investee companies are dealt with. During the reporting year, no stakeholders approached us for this. Yet, we have several engagements with investee companies in which we discussed their indirect contribution e.g. to the civil war in Yemen or the suppression in Myanmar.

(B) Yes, we used our influence to ensure that our investees provided access to remedies for people affected by negative human rights outcomes we were linked to through our investment activities

(C) No, we did not enable access to remedy directly, or through the use of influence over investees, for people affected by negative human rights outcomes connected to our investment activities during the reporting year

MANAGER SELECTION, APPOINTMENT AND MONITORING (SAM)

OVERALL APPROACH

EXTERNAL INVESTMENT MANAGERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 1	CORE	OO 21	N/A	PUBLIC	External investment managers	4

For the majority of your externally managed AUM in each asset class, which responsible investment aspects does your organisation consider important in the assessment of external investment managers?

	(1) Listed equity (active)	(2) Listed equity (passive)	(3) Fixed income (active)	(4) Fixed income (passive)
Organisation				
(A) Commitment to and experience in responsible investment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Responsible investment policy(ies)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Governance structure and senior-level oversight and accountability	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
People and Culture				
(D) Adequate resourcing and incentives	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(E) Staff competencies and experience in responsible investment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Investment Process				

(F) Incorporation of material ESG factors in the investment process	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(G) Incorporation of risks connected to systematic sustainability issues in the investment process	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(H) Incorporation of material ESG factors and ESG risks connected to systematic sustainability issues in portfolio risk assessment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Stewardship				
(I) Policy(ies) or guidelines on stewardship	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(J) Policy(ies) or guidelines on (proxy) voting	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(K) Use of stewardship tools and activities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(L) Incorporation of risks connected to systematic sustainability issues in stewardship practices	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(M) Involvement in collaborative engagement and stewardship initiatives	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(N) Engagement with policy makers and other non-investee stakeholders	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(O) Results of stewardship activities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Performance and Reporting				
(P) ESG disclosure in regular client reporting	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(Q) Inclusion of ESG factors in contractual agreements	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
--	-------------------------------------	-------------------------------------	-------------------------------------	-------------------------------------

(R) We do not consider any of the above responsible investment aspects important in the assessment of external investment managers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	--------------------------

	(5) Private equity	(6) Real estate	(7) Infrastructure	(8) Hedge funds
--	--------------------	-----------------	--------------------	-----------------

Organisation

(A) Commitment to and experience in responsible investment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
--	-------------------------------------	-------------------------------------	-------------------------------------	-------------------------------------

(B) Responsible investment policy(ies)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
--	-------------------------------------	-------------------------------------	-------------------------------------	-------------------------------------

(C) Governance structure and senior-level oversight and accountability	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
--	-------------------------------------	-------------------------------------	-------------------------------------	-------------------------------------

People and Culture

(D) Adequate resourcing and incentives	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
--	-------------------------------------	-------------------------------------	-------------------------------------	-------------------------------------

(E) Staff competencies and experience in responsible investment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
---	-------------------------------------	-------------------------------------	-------------------------------------	-------------------------------------

Investment Process

(F) Incorporation of material ESG factors in the investment process	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(G) Incorporation of risks connected to systematic sustainability issues in the investment process	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(H) Incorporation of material ESG factors and ESG risks connected to systematic sustainability issues in portfolio risk assessment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Stewardship				
(I) Policy(ies) or guidelines on stewardship	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(J) Policy(ies) or guidelines on (proxy) voting	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(K) Use of stewardship tools and activities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(L) Incorporation of risks connected to systematic sustainability issues in stewardship practices	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(M) Involvement in collaborative engagement and stewardship initiatives	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(N) Engagement with policy makers and other non-investee stakeholders	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(O) Results of stewardship activities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Performance and Reporting				
(P) ESG disclosure in regular client reporting	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(Q) Inclusion of ESG factors in contractual agreements

(R) We do not consider any of the above responsible investment aspects important in the assessment of external investment managers

SERVICE PROVIDERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 2	CORE	OO 21	N/A	PUBLIC	Service providers	4

Which responsible investment aspects does your organisation consider important when assessing all service providers that advise you in the selection, appointment and/or monitoring of external investment managers?

- (A) Incorporation of their responsible investment policy into advisory services
- (B) Ability to accommodate our responsible investment policy
- (C) Level of staff's responsible investment expertise
- (D) Use of data and analytical tools to assess the external investment manager's responsible investment performance
- (E) Other
- (F) We do not consider any of the above responsible investment aspects important when assessing service providers that advise us in the selection, appointment and/or monitoring of external investment managers
- (G) **Not applicable; we do not engage service providers in the selection, appointment or monitoring of external investment managers**

POOLED FUNDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 3	PLUS	OO 5.2, OO 21	N/A	PUBLIC	Pooled funds	4

If you invest in pooled funds, describe how you incorporate responsible investment aspects into the selection, appointment and/or monitoring of external investment managers.

Provide example(s) below

(A) Selection

The incorporation of ESG into our manager selection process starts with our pillar philosophy:

1. Integration: Managers must integrate ESG factors into their investment processes and decisions when financial risk or return is affected.
2. Setting expectations: Managers must be aware of all financially material ESG factors associated with an investment.
3. Active engagement: Managers must engage with all stakeholders on ESG considerations where possible, and where those same considerations affect financial risk or return.

4. Education: We believe in transparency; granular feedback and sharing best practice with our managers produces improved outcomes.
5. Pragmatic: We believe substance over form and focusing time where ESG factors can have the greatest impact on returns and risk.

ESG criteria are then formerly integrated into our assessment of all third-party managers throughout the manager research process: pre-investment, during the hold-period and upon exit.

- All new fund investments are assigned an ESG rating, using our proprietary ESG scoring methodology, pre-investment, with ESG analysis required at every stage of the investment committee. This process is governed and has oversight from the Manager Research Committee who will review this analysis and challenge where necessary (see (B) below for detail on ESG Score).

(B)
Appointment

ESG rating

The ESG rating is undertaken for all new fund investments (and then re-rated annually) comprising of 2 key levels:

o Level 1 | ESG rating: All fund products receive an ESG rating. To make this assessment we send out asset class specific ESG questionnaires to our third-party managers. The assessment comprises of 4 sub-sections (see below):

- People and Policy: Does the fund manager have a sustainable investment policy and a stewardship policy? Does the policy cover all their investments?
- Integration: How important are ESG issues to the investment thesis? Does the fund manager integrate ESG issues in their investment processes? If so, how and can they demonstrate it?
- Engagement: Does the fund manager engage on ESG issues with the companies it owns etc.?
- Reporting: Does the fund manager disclose their ESG activities clearly and in detail etc.?

o Level 2 | Momentum score: We provide every investment with a forward-looking assessment of how we view the manager/product's ESG momentum. This level looks at whether a manager has Positive, Neutral or Negative ESG momentum. To make this assessment, we will look at what changes or plans a Manager has in the pipeline.

- All new appointments will undergo rigorous ESG analysis and assessment (through the ESG rating), and these scores are overseen by the Manager Research Committee.
- We have a minimum expectation that for all investment strategies where ESG factors do or could materially impact financial return, that ESG is integrated into their investment process.
- Where a strategy does not meet our ESG standard, we would not invest. Where a strategy is close to meeting the bar, we take an engagement first approach and would work with the relevant manager to seek to improve their ESG strategy to the requisite level, prior to making any investment.

(C) Monitoring

- We re-send our ESG questionnaires to all invested managers annually. This is done to cover any relevant changes to their policies and to monitor them on all aspect of ESG integration. It also allows us to formally re-rate the funds and set a base-line from which to engage with managers.
- Our ESG questionnaires are tailored to the strategy of the manager, and where appropriate we will challenge where managers are not considering ESG factors as expected, or processes fall short of best practice.

Utilising Our ESG Rating to set a Baseline

- A critical component of our rating process is to provide feedback and seek improvement from invested managers.
- All managers receive their ESG rating, including areas of improvement. We offer detailed follow-up discussions on these scores.
- These scores then serve as the base-line we set for managers, from which we seek improvement for the following year.
- For funds that have scored poorly, we will also specify (time-based) ESG milestones to highlight areas where they need to improve. The Manager Research team will then engage and track progress against these milestones.

Day to day

- Day to day: The funds are monitored by the Manager Research Team through regular meetings, reviews of ESG reporting and ad-hoc updates on ESG matters. ESG ratings can be updated, at any time, based on new information that is sourced through these interactions.
- Data analytics: All ESG interactions are monitored and logged in our database, to track engagement cadence.
- Governance: All significant ESG matters related to any of the funds that the Manager Research Team cover are discussed, when they arise, at the weekly Manager Research Committee.

Additional monitoring

- We track Diversity & Inclusion statistics across all invested managers.

- Where ESG factors are deemed to materially impact financial return, managers are sent quarterly information requests tracking their voting activity, use of proxies and engagement examples over that period.

SELECTION

RESPONSIBLE INVESTMENT PRACTICES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 4	CORE	OO 12, OO 21	SAM 5, SAM 6, SAM 7	PUBLIC	Responsible investment practices	General

During the reporting year, did your organisation select new external investment managers or allocate new mandates to existing investment managers?

- (A) Yes, we selected external investment managers or allocated new mandates to existing investment managers during the reporting year
- (B) No, we did not select new external investment managers or allocate new mandates to existing investment managers during the reporting year
- (C) Not applicable; our organisation is in a captive relationship with external investment managers, which applies to 90% or more of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 5	CORE	SAM 4	N/A	PUBLIC	Responsible investment practices	4

During the reporting year, what responsible investment aspects did your organisation, or the service provider acting on your behalf, review and evaluate when selecting new external investment managers or allocating new mandates to existing investment managers?

Organisation

(A) Commitment to and experience in responsible investment (e.g. commitment to responsible investment principles and standards)

Select from dropdown list

- (1) for all of our mandates
- (2) for a majority of our mandates
- (3) for a minority of our mandates

(B) Responsible investment policy(ies) (e.g. the alignment of their responsible investment policy with the investment mandate)

Select from dropdown list

- (1) for all of our mandates**
- (2) for a majority of our mandates
- (3) for a minority of our mandates

(C) Governance structure and senior-level oversight and accountability (e.g. the adequacy of their governance structure and reported conflicts of interest)

Select from dropdown list

- (1) for all of our mandates**
- (2) for a majority of our mandates
- (3) for a minority of our mandates

People and Culture

(D) Adequate resourcing and incentives (e.g. their team structures, operating model and remuneration structure, including alignment of interests)

Select from dropdown list

- (1) for all of our mandates**
- (2) for a majority of our mandates
- (3) for a minority of our mandates

(E) Staff competencies and experience in responsible investment (e.g. level of responsible investment responsibilities in their investment team, their responsible investment training and capacity building)

Select from dropdown list

- (1) for all of our mandates**
- (2) for a majority of our mandates
- (3) for a minority of our mandates

Investment Process

(F) Incorporation of material ESG factors in the investment process (e.g. detail and evidence of how such factors are incorporated into the selection of individual assets and in portfolio construction)

Select from dropdown list

- (1) for all of our mandates**
- (2) for a majority of our mandates
- (3) for a minority of our mandates

(G) Incorporation of risks connected to systematic sustainability issues in the investment process (e.g. detail and evidence of how such risks are incorporated into the selection of individual assets and in portfolio construction)

Select from dropdown list

- (1) for all of our mandates**
- (2) for a majority of our mandates
- (3) for a minority of our mandates

(H) Incorporation of material ESG factors and ESG risks connected to systematic sustainability issues in portfolio risk assessment (e.g. their process to measure and report such risks)

Select from dropdown list

- (1) for all of our mandates**
- (2) for a majority of our mandates
- (3) for a minority of our mandates

Performance and Reporting

(I) ESG disclosure in regular client reporting

Select from dropdown list

- (1) for all of our mandates**
- (2) for a majority of our mandates
- (3) for a minority of our mandates

(J) Inclusion of ESG factors in contractual agreements

Select from dropdown list

- (1) for all of our mandates
 - (2) for a majority of our mandates
 - (3) for a minority of our mandates
- (K) We did not review and evaluate any of the above responsible investment aspects when selecting new external investment managers or allocating new mandates to existing investment managers during the reporting year

STEWARDSHIP

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 6	CORE	OO 8, SAM 4	N/A	PUBLIC	Stewardship	4

During the reporting year, which aspects of the stewardship approach did your organisation, or the service provider acting on your behalf, review and evaluate when selecting new external investment managers or allocating new mandates to existing investment managers?

(A) The alignment of their policy(ies) or guidelines on stewardship with the investment mandate

Select from dropdown list

- (1) for all of our mandates
- (2) for a majority of our mandates
- (3) for a minority of our mandates

(B) Evidence of how they implemented their stewardship objectives, including the effectiveness of their activities

Select from dropdown list

- (1) for all of our mandates
- (2) for a majority of our mandates
- (3) for a minority of our mandates

(C) Their participation in collaborative engagements and stewardship initiatives

Select from dropdown list

- (1) for all of our mandates
- (2) for a majority of our mandates
- (3) for a minority of our mandates

(D) Details of their engagements with companies or issuers on risks connected to systematic sustainability issues

Select from dropdown list

- (1) for all of our mandates
- (2) for a majority of our mandates
- (3) for a minority of our mandates

(E) Details of their engagement activities with policy makers

Select from dropdown list

- (1) for all of our mandates
- (2) for a majority of our mandates
- (3) for a minority of our mandates

(F) Their escalation process and the escalation tools included in their policy on stewardship

Select from dropdown list

- (1) for all of our mandates
- (2) for a majority of our mandates
- (3) for a minority of our mandates

- (G) We did not review and evaluate any of the above aspects of the stewardship approach when selecting new external investment managers or allocating new mandates to existing investment managers during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 7	CORE	OO 9, SAM 4	N/A	PUBLIC	Stewardship	4

During the reporting year, which aspects of (proxy) voting did your organisation, or the service provider acting on your behalf, review and evaluate when selecting new external investment managers or allocating new mandates to existing investment managers?

- (A) The alignment of their policy(ies) or guidelines on (proxy) voting with the investment mandate**
Select from dropdown list
 - (1) for all of our mandates**
 - (2) for a majority of our mandates
 - (3) for a minority of our mandates
- (B) Historical information on the number or percentage of general meetings at which they voted**
Select from dropdown list
 - (1) for all of our mandates**
 - (2) for a majority of our mandates
 - (3) for a minority of our mandates
- (C) Analysis of votes cast for and against**
Select from dropdown list
 - (1) for all of our mandates**
 - (2) for a majority of our mandates
 - (3) for a minority of our mandates
- (D) Analysis of votes cast for and against resolutions related to risks connected to systematic sustainability issues**
Select from dropdown list
 - (1) for all of our mandates**
 - (2) for a majority of our mandates
 - (3) for a minority of our mandates
- (E) Details of their position on any controversial and high-profile votes**
Select from dropdown list
 - (1) for all of our mandates**
 - (2) for a majority of our mandates
 - (3) for a minority of our mandates
- (F) Historical information of any resolutions on which they voted contrary to their own voting policy and the reasons why**
Select from dropdown list
 - (1) for all of our mandates**
 - (2) for a majority of our mandates
 - (3) for a minority of our mandates
- (G) Details of all votes involving companies where the external investment manager or an affiliate has a contractual relationship or another potential conflict of interest**
Select from dropdown list
 - (1) for all of our mandates**
 - (2) for a majority of our mandates
 - (3) for a minority of our mandates

- (H) We did not review and evaluate any of the above aspects of (proxy) voting when selecting new external investment managers or allocating new mandates to existing investment managers during the reporting year
- (I) Not applicable; our organisation did not select new external investment managers or allocated new mandates to existing investment managers for listed equity and/or hedge funds that hold equity.

APPOINTMENT

SEGREGATED MANDATES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 8	CORE	OO 5.2, OO 13	N/A	PUBLIC	Segregated mandates	4

Which responsible investment aspects do your organisation, or the service provider acting on your behalf, explicitly include in clauses within your contractual agreements with your external investment managers for segregated mandates?

- (A) Their commitment to following our responsible investment strategy in the management of our assets**
Select from dropdown list
 - (1) for all of our segregated mandates**
 - (2) for a majority of our segregated mandates
 - (3) for a minority of our segregated mandates
- (B) Their commitment to incorporating material ESG factors into their investment activities**
Select from dropdown list
 - (1) for all of our segregated mandates**
 - (2) for a majority of our segregated mandates
 - (3) for a minority of our segregated mandates
- (C) Their commitment to incorporating material ESG factors into their stewardship activities**
Select from dropdown list
 - (1) for all of our segregated mandates**
 - (2) for a majority of our segregated mandates
 - (3) for a minority of our segregated mandates
- (D) Their commitment to incorporating risks connected to systematic sustainability issues into their investment activities**
Select from dropdown list
 - (1) for all of our segregated mandates**
 - (2) for a majority of our segregated mandates
 - (3) for a minority of our segregated mandates
- (E) Their commitment to incorporating risks connected to systematic sustainability issues into their stewardship activities**
Select from dropdown list
 - (1) for all of our segregated mandates**
 - (2) for a majority of our segregated mandates
 - (3) for a minority of our segregated mandates
- (F) Exclusion list(s) or criteria**
Select from dropdown list
 - (1) for all of our segregated mandates**
 - (2) for a majority of our segregated mandates
 - (3) for a minority of our segregated mandates
- (G) Responsible investment communications and reporting obligations, including stewardship activities and results**

Select from dropdown list

- (1) for all of our segregated mandates
- (2) for a majority of our segregated mandates
- (3) for a minority of our segregated mandates

(H) Incentives and controls to ensure alignment of interests

Select from dropdown list

- (1) for all of our segregated mandates
- (2) for a majority of our segregated mandates
- (3) for a minority of our segregated mandates

(I) Commitments on climate-related disclosure in line with internationally-recognised frameworks such as the TCFD

Select from dropdown list

- (1) for all of our segregated mandates
- (2) for a majority of our segregated mandates
- (3) for a minority of our segregated mandates

(J) Commitment to respect human rights as defined in the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights

Select from dropdown list

- (1) for all of our segregated mandates
- (2) for a majority of our segregated mandates
- (3) for a minority of our segregated mandates

(K) Their acknowledgement that their appointment is conditional on the fulfilment of their agreed responsible investment commitments

Select from dropdown list

- (1) for all of our segregated mandates
- (2) for a majority of our segregated mandates
- (3) for a minority of our segregated mandates

(L) Other

- (M) We do not include responsible investment aspects in clauses within our contractual agreements with external investment managers for segregated mandates

MONITORING

RESPONSIBLE INVESTMENT PRACTICES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 9	CORE	OO 14, OO 21	N/A	PUBLIC	Responsible investment practices	4

For the majority of your externally managed AUM in each asset class, which aspects of your external investment managers' responsible investment practices did your organisation, or the service provider acting on your behalf, monitor during the reporting year?

	(1) Listed equity (active)	(2) Listed equity (passive)	(3) Fixed income (active)	(4) Fixed income (passive)
Organisation				
(A) Commitment to and experience in responsible investment (e.g. commitment to responsible investment principles and standards)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Responsible investment policy(ies) (e.g. the continued alignment of their responsible investment policy with the investment mandate)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Governance structure and senior level oversight and accountability (e.g. the adequacy of their governance structure and reported conflicts of interest)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
People and Culture				
(D) Adequate resourcing and incentives (e.g. their team structures, operating model and remuneration structure, including alignment of interests)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(E) Staff competencies and experience in responsible investment (e.g. level of responsible investment responsibilities in their investment team, their responsible investment training and capacity building)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Investment Process				

(F) Incorporation of material ESG factors in the investment process (e.g. detail and evidence of how such factors are incorporated into the selection of individual assets and in portfolio construction)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
---	-------------------------------------	-------------------------------------	-------------------------------------	-------------------------------------

(G) Incorporation of risks connected to systematic sustainability issues in the investment process (e.g. detail and evidence of how such risks are incorporated into the selection of individual assets and in portfolio construction)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
--	-------------------------------------	-------------------------------------	-------------------------------------	-------------------------------------

(H) Incorporation of material ESG factors and ESG risks connected to systematic sustainability issues in portfolio risk assessment (e.g. their process to measure and report such risks, their response to ESG incidents)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
---	-------------------------------------	-------------------------------------	-------------------------------------	-------------------------------------

Performance and Reporting

(I) ESG disclosure in regular client reporting (e.g. any changes in their regular client reporting)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
---	-------------------------------------	-------------------------------------	-------------------------------------	-------------------------------------

(J) Inclusion of ESG factors in contractual agreements	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
--	-------------------------------------	-------------------------------------	-------------------------------------	-------------------------------------

(K) We did not monitor any of the above aspects of our external investment managers' responsible investment practices during the reporting year	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
---	--------------------------	--------------------------	--------------------------	--------------------------

Organisation

(A) Commitment to and experience in responsible investment (e.g. commitment to responsible investment principles and standards)



(B) Responsible investment policy(ies) (e.g. the continued alignment of their responsible investment policy with the investment mandate)



(C) Governance structure and senior level oversight and accountability (e.g. the adequacy of their governance structure and reported conflicts of interest)

**People and Culture**

(D) Adequate resourcing and incentives (e.g. their team structures, operating model and remuneration structure, including alignment of interests)



(E) Staff competencies and experience in responsible investment (e.g. level of responsible investment responsibilities in their investment team, their responsible investment training and capacity building)



Investment Process

(F) Incorporation of material ESG factors in the investment process (e.g. detail and evidence of how such factors are incorporated into the selection of individual assets and in portfolio construction)

(G) Incorporation of risks connected to systematic sustainability issues in the investment process (e.g. detail and evidence of how such risks are incorporated into the selection of individual assets and in portfolio construction)

(H) Incorporation of material ESG factors and ESG risks connected to systematic sustainability issues in portfolio risk assessment (e.g. their process to measure and report such risks, their response to ESG incidents)

Performance and Reporting

(I) ESG disclosure in regular client reporting (e.g. any changes in their regular client reporting)

(J) Inclusion of ESG factors in contractual agreements

(K) We did not monitor any of the above aspects of our external investment managers' responsible investment practices during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 10	PLUS	OO 14, OO 21	N/A	PUBLIC	Responsible investment practices	1

During the reporting year, which information did your organisation, or the service provider acting on your behalf, monitor for externally managed ESG passive products and strategies?

	(1) Listed equity (passive)	(2) Fixed income (passive)
(A) How the external investment managers applied, reviewed and verified screening criteria	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(B) How the external investment managers rebalanced the products as a result of changes in ESG rankings, ratings or indexes	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(C) Evidence that ESG passive products and strategies meet the responsible investment criteria and process	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(D) Other	<input type="checkbox"/>	<input type="checkbox"/>
(E) We did not monitor ESG passive products and strategies	<input type="radio"/>	<input type="radio"/>
(F) Not applicable; we do not invest in ESG passive products and strategies	<input type="radio"/>	<input checked="" type="radio"/>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 11	PLUS	OO 14, OO 21	N/A	PUBLIC	Responsible investment practices	1

Describe an innovative practice you adopted as part of monitoring your external investment managers' responsible investment practices in a specific asset class during the reporting year.

Monitoring Practice: Review of Form ADV's for governance risk indications.

Asset Class: all relevant strategies (i.e. ADV filings required)

Recent example: a manager added a governance risk disclosure to their Form ADV. This information was not something previously communicated to investors. As a result of this monitoring, we were able to engage with the investment manager on this matter as it represented a considerable governance risk to the investment.

Monitoring Practice: Targeted use of external ESG data in monitoring.

Asset Class: all relevant strategies (i.e.

where we have portfolio transparency)

Recent example: we used external data to identify that a manager held a position that had recently been downgraded to a laggard in the peer group due to poor labour management practices. This targeted use of data, allowed us to challenge and discuss with the manager their process and rationale for their continued hold of this position.

Monitoring Practice: Tracking of voting records to identify instances where managers have fallen foul of so called "anti-ESG proposals" on shareholder resolutions.

Asset Class: all relevant strategies (i.e. strategies able vote)

Recent example: one of our invested managers voted accidentally for an anti-equality resolution in the belief they were voting for a resolution that would improve action around inequality. We identified this from their voting records and engaged with the manager. As a result of this action, the manager acknowledged the mistake and made changes with their proxy voting provider to help them identify anti-ESG proposals better in the future provider to help them identify anti-ESG proposals better in the future.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 12	CORE	OO 14, OO 21	N/A	PUBLIC	Responsible investment practices	1

For the majority of your externally managed AUM in each asset class, how often does your organisation, or the service provider acting on your behalf, monitor your external investment managers' responsible investment practices?

	(1) Listed equity (active)	(2) Listed equity (passive)	(3) Fixed income (active)	(4) Fixed income (passive)
(A) At least annually	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Less than once a year	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(C) On an ad hoc basis	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

	(5) Private equity	(6) Real estate	(7) Infrastructure	(8) Hedge funds
(A) At least annually	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Less than once a year	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(C) On an ad hoc basis	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

STEWARDSHIP

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 13	CORE	OO 8, OO 21	N/A	PUBLIC	Stewardship	1, 2

For the majority of your externally managed AUM in each asset class, which aspects of your external investment managers' stewardship practices did your organisation, or the service provider acting on your behalf, monitor during the reporting year?

	(1) Listed equity (active)	(2) Listed equity (passive)	(3) Fixed income (active)	(4) Fixed income (passive)
(A) Any changes in their policy(ies) or guidelines on stewardship	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) The degree of implementation of their policy(ies) or guidelines on stewardship	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) How they prioritise material ESG factors	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) How they prioritise risks connected to systematic sustainability issues	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(E) Their investment team's level of involvement in stewardship activities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(F) Whether the results of stewardship actions were fed back into the investment process and decisions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(G) Whether they used a variety of stewardship tools and activities to advance their stewardship priorities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(H) The deployment of their escalation process in cases where initial stewardship efforts were unsuccessful	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(I) Whether they participated in collaborative engagements and stewardship initiatives	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(J) Whether they had an active role in collaborative engagements and stewardship initiatives	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(K) Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(L) We did not monitor our external investment managers' stewardship practices during the reporting year	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	(5) Private equity	(6) Real estate	(7) Infrastructure	(8) Hedge funds
(A) Any changes in their policy(ies) or guidelines on stewardship	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) The degree of implementation of their policy(ies) or guidelines on stewardship	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) How they prioritise material ESG factors	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) How they prioritise risks connected to systematic sustainability issues	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(E) Their investment team's level of involvement in stewardship activities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(F) Whether the results of stewardship actions were fed back into the investment process and decisions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(G) Whether they used a variety of stewardship tools and activities to advance their stewardship priorities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(H) The deployment of their escalation process in cases where initial stewardship efforts were unsuccessful	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(I) Whether they participated in collaborative engagements and stewardship initiatives	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(J) Whether they had an active role in collaborative engagements and stewardship initiatives	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(K) Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(L) We did not monitor our external investment managers' stewardship practices during the reporting year	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 14	CORE	OO 9, OO 21	N/A	PUBLIC	Stewardship	1, 2

For the majority of your AUM in each asset class where (proxy) voting is delegated to external investment managers, which aspects of your external investment managers' (proxy) voting practices did your organisation, or the service provider acting on your behalf, monitor during the reporting year?

	(1) Listed equity (active)	(2) Listed equity (passive)
(A) Any changes in their policy(ies) or guidelines on (proxy) voting	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Whether their (proxy) voting decisions were consistent with their stewardship priorities as stated in their policy and with their voting policy, principles and/or guidelines	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Whether their (proxy) voting decisions were consistent with their stated approach on the prioritisation of risks connected to systematic sustainability issues	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(D) Whether their (proxy) voting track record was aligned with our stewardship approach and expectations	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(E) The application of their policy on securities lending and any implications for implementing their policy(ies) or guidelines on (proxy) voting (where applicable)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(F) Other	<input type="checkbox"/>	<input type="checkbox"/>
(G) We did not monitor our external investment managers' (proxy) voting practices during the reporting year	<input type="radio"/>	<input type="radio"/>

ENGAGEMENT AND ESCALATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 15	PLUS	OO 14, OO 21	N/A	PUBLIC	Engagement and escalation	4

Describe how your organisation engaged with external investment managers to improve their responsible investment practices during the reporting year.

Engagement is a major component of our manager research and monitoring process. We use our position to bring about change in our positions across a range of approaches:

- Feedback: All ratings are fed back to managers, providing feedback on specific areas to improve.
- Influence: As a large allocator in private markets we hold seats on > 15 Advisory Committees – using this platform to raise ESG issues and drive manager focus.
- Milestones: Bespoke engagement plans for poorly rated managers.
- Engagement tracking: engagement on milestones are tracked in our database.
- Expectation setting: an annual letter is written to all managers (topic changes each year: 2021's topic was climate change, 2022's was stewardship and inequality).
- Education: we hold regular training sessions with managers and other stakeholders on ESG best practice.

Examples:

1: Tracking of voting records to identify instances where managers have fallen foul of so called “anti-ESG proposals”.

- See SAM 11
- Outcome: The manager acknowledged their mistake on voting for an anti-ESG resolution and made changes with their proxy voting provider to help them identify anti-ESG proposals better in the future.

2: Targeted use of external ESG data in monitoring.

- See SAM 11
- Outcome: We left the meeting comfortable that (i) the manager was aware of this downgrade and was able to provide a good explanation why; (ii) we were pleased to see that the manager was making comparisons with the underlying company’s global peers on what constituted best practice; and (iii) we made a note to follow up with the external investment manager to determine the progress made

3: Flagging collaborative / industry engagement efforts to our managers.

- We engaged with some invested managers to notify them of the Global Stewardship Resourcing Survey that the PRI has been running.
- The outcome of this engagement was that it prompted some of these managers to participate in this Survey and they confirmed this to us.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 16	CORE	OO 14, OO 21	N/A	PUBLIC	Engagement and escalation	4

What actions does your organisation, or the service provider acting on your behalf, include in its formal escalation process to address concerns raised during monitoring of your external investment managers’ responsible investment practices?

	(1) Listed equity (active)	(2) Listed equity (passive)	(3) Fixed income (active)	(4) Fixed income (passive)
(A) Engagement with their investment professionals, investment committee or other representatives	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Notification about their placement on a watch list or relationship coming under review	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Reduction of capital allocation to the external investment managers until any concerns have been rectified	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(D) Termination of the contract if failings persist over a (notified) period, including an explanation of the reasons for termination	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(E) Holding off selecting the external investment managers for new mandates or allocating additional capital until any concerns have been rectified	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(F) Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(G) Our organisation does not have a formal escalation process to address concerns raised during monitoring	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	(5) Private equity	(6) Real estate	(7) Infrastructure	(8) Hedge funds
(A) Engagement with their investment professionals, investment committee or other representatives	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Notification about their placement on a watch list or relationship coming under review	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Reduction of capital allocation to the external investment managers until any concerns have been rectified	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(D) Termination of the contract if failings persist over a (notified) period, including an explanation of the reasons for termination	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(E) Holding off selecting the external investment managers for new mandates or allocating additional capital until any concerns have been rectified	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(F) Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(G) Our organisation does not have a formal escalation process to address concerns raised during monitoring	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

VERIFICATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 17	CORE	OO 14, OO 21	N/A	PUBLIC	Verification	1

For the majority of your externally managed AUM in each asset class, how did your organisation, or the service provider acting on your behalf, verify that the information reported by external investment managers on their responsible investment practices was correct during the reporting year?

	(1) Listed equity (active)	(2) Listed equity (passive)	(3) Fixed income (active)	(4) Fixed income (passive)
(A) We checked that the information reported was verified through a third-party assurance process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(B) We checked that the information reported was verified by an independent third party	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(C) We checked for evidence of internal monitoring or compliance	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(D) Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(E) We did not verify the information reported by external investment managers on their responsible investment practices during the reporting year	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	(5) Private equity	(6) Real estate	(7) Infrastructure	(8) Hedge funds
(A) We checked that the information reported was verified through a third-party assurance process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(B) We checked that the information reported was verified by an independent third party	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(C) We checked for evidence of internal monitoring or compliance	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(E) We did not verify the information reported by external investment managers on their responsible investment practices during the reporting year	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

LISTED EQUITY (LE)

OVERALL APPROACH

MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 1	CORE	OO 21	N/A	PUBLIC	Materiality analysis	1

Does your organisation have a formal investment process to identify and incorporate material ESG factors across your listed equity strategies?

	(1) Passive equity	(3) Active - fundamental
(A) Yes, our investment process incorporates material governance factors	(1) for all of our AUM	(1) for all of our AUM
(B) Yes, our investment process incorporates material environmental and social factors	(1) for all of our AUM	(1) for all of our AUM
(C) Yes, our investment process incorporates material ESG factors beyond our organisation's average investment holding period	(1) for all of our AUM	(1) for all of our AUM
(D) No, we do not have a formal process. Our investment professionals identify material ESG factors at their discretion	○	○
(E) No, we do not have a formal or informal process to identify and incorporate material ESG factors	○	○

MONITORING ESG TRENDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 2	CORE	OO 21	N/A	PUBLIC	Monitoring ESG trends	1

Does your organisation have a formal process for monitoring and reviewing the implications of changing ESG trends across your listed equity strategies?

	(1) Passive equity	(3) Active - fundamental
(A) Yes, we have a formal process that includes scenario analyses	(1) for all of our AUM	(1) for all of our AUM
(B) Yes, we have a formal process, but it does not include scenario analyses		
(C) We do not have a formal process for our listed equity strategies; our investment professionals monitor how ESG trends vary over time at their discretion	○	○
(D) We do not monitor and review the implications of changing ESG trends on our listed equity strategies	○	○

(A) Yes, we have a formal process that includes scenario analysis - Specify: (Voluntary)

We annually perform a climate scenario analysis for our internally managed funds and mandates. This analysis shows how climate change trends are expected to impact the transition and physical risks for companies. In addition, we annually monitor trends across ESG risks and opportunities. For this, we consider whether existing or new ESG-related themes become more or less material and which sectors or regions may be impacted most and in what time frame. This impacts the choice whether we add the theme to our active ownership strategy, where we encourage issuers to better consider these risks, or whether the themes are so important and create so much direct risk for issuers that it becomes part of our screening and selection procedures

PRE-INVESTMENT

ESG INCORPORATION IN RESEARCH

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 3	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

How does your financial analysis and equity valuation or security rating process incorporate material ESG risks?

(2) Active - fundamental

(A) We incorporate material governance-related risks into our financial analysis and equity valuation or security rating process

(1) in all cases

(B) We incorporate material environmental and social risks into our financial analysis and equity valuation or security rating process

(1) in all cases

(C) We incorporate material environmental and social risks related to companies' supply chains into our financial analysis and equity valuation or security rating process

(1) in all cases

(D) We do not incorporate material ESG risks into our financial analysis, equity valuation or security rating processes

o

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 4	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

What information do you incorporate when you assess the ESG performance of companies in your financial analysis, benchmark selection and/or portfolio construction process?

	(1) Passive equity	(3) Active - fundamental
(A) We incorporate qualitative and/or quantitative information on current performance across a range of material ESG factors	(1) in all cases	(1) in all cases
(B) We incorporate qualitative and/or quantitative information on historical performance across a range of material ESG factors	(1) in all cases	(1) in all cases
(C) We incorporate qualitative and/or quantitative information on material ESG factors that may impact or influence future corporate revenues and/or profitability	(1) in all cases	(1) in all cases
(D) We incorporate qualitative and/or quantitative information enabling current, historical and/or future performance comparison within a selected peer group across a range of material ESG factors	(1) in all cases	(1) in all cases

(E) We do not incorporate qualitative or quantitative information on material ESG factors when assessing the ESG performance of companies in our financial analysis, equity investment or portfolio construction process

o

o

ESG INCORPORATION IN PORTFOLIO CONSTRUCTION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 5	PLUS	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

Provide an example of how you incorporated ESG factors into your equity selection and research process during the reporting year.

Within all our equity funds we use ESG factors in our selection of stocks in which we can invest.

All companies in the funds are selected based on a detailed due diligence as described in the Cardano Sustainable Investment Policy. In this policy we describe that we categorize all issuers in the universe based on our holistic sustainable investment framework. For this, based on a broad range of ESG related data, we first evaluate to what extent companies comply with international norms and our ethical standards.

Next to the OECD guidelines and UN Guiding Principles, this includes for instance screening on cluster munitions, child labour and forced labor, but also activities we deem harmful for society such as tobacco, gambling and adult entertainment. Issuers not complying with our fundamental investment principles are excluded from investments. In a second step, we evaluate which companies are deemed capable of transitioning their businesses operations such that they operate sustainable, i.e. operate within the planetary boundaries and with respect of social foundations. For this, we follow a double materiality approach, where we consider whether ESG themes cause risks or opportunities for the company as well as for society.

For instance companies active in fossil fuel activities must show proof that they are making the transition towards a low-carbon economy within a sector-specific, science based pathway in order to remain investable in our funds. Those that don't have the adaptive capacity to make this transition cause too high risks for our portfolios and for society and are therefore excluded from investments. This judgement is based on a broad set of indicators that best reflect forward-looking characteristics of business practices, on a set of indicators showing the impact of a company on society and the environment, and on a fundamental assessment by our sustainability experts. The assessment evaluates which ESG related themes are material to the company and to society and includes themes like climate change, biodiversity loss, water scarcity, materials use, social capital management, human capital management and organisational behaviour.

Each case is presented to a multidisciplinary committee that tests for consistency of the application of our policies.

This screening framework is applied to all equity and fixed income strategies. Only the companies for which the due diligence process concludes that they comply with the rules as presented in our Sustainable Investment Policy are investable. They form the basis of the investable universe of our enhanced index strategies as well as our sustainable equity strategies. Fundamental assessments are thus part of our starting point within all of portfolios.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 6	CORE	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

How do material ESG factors contribute to your stock selection, portfolio construction and/or benchmark selection process?

	(1) Passive equity	(3) Active - fundamental
(A) Material ESG factors contribute to the selection of individual assets and/or sector weightings within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM
(B) Material ESG factors contribute to the portfolio weighting of individual assets within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM
(C) Material ESG factors contribute to the country or region weighting of assets within our portfolio construction and/or benchmark selection process	(2) for a majority of our AUM	(2) for a majority of our AUM
(D) Other ways material ESG factors contribute to your portfolio construction and/or benchmark selection process		
(E) Our stock selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors	o	o

PASSIVE INVESTMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 7	PLUS	OO 21	N/A	PUBLIC	Passive investments	1

Provide an example of how material ESG factors influenced weightings and tilts in the design of your passively managed funds.

As explained in question LE5, ESG factors are key to the construction of the investable universe. For determining portfolio weights for all issuers in the investable universe in the passively managed funds, we use ESG factors to tilt our portfolios towards better ESG characteristics than the broader benchmark but also in line with our set sustainability targets.

Within our enhanced index funds we committed to having higher ESG scores, lower water and carbon footprints than the benchmark. This is ensured via the implementation of these metrics in our portfolio optimisation process, where constraints are implemented to assure that the portfolio ESG score is higher than the benchmark ESG score, the portfolio water footprint is lower than the benchmark water footprint and the portfolio follows the prescribed pathway of at least a 7% annual reduction of greenhouse gas per unit of sales. For this, we have implemented for each enhanced index strategy a carbon pathway whereby we have calculated a glide path towards net zero in 2050. We monitor on a quarterly basis whether the portfolios follow the required pathway or whether reweighting or reassessment of certain companies is needed.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 8	PLUS	OO 19, OO 21	N/A	PUBLIC	Passive investments	1

How does your organisation select the ESG index(es) or benchmark(s) for your passive listed equity assets?

- (A) We commission customised indexes
- (B) We compare the methodology amongst the index providers available
- (C) We compare the costs of different options available in the market
- (D) Other

Specify and explain:

Given the impact an ESG index has on the eventual performance and the deviation from the broader market, we opted for most of our passive equity strategies to use a broad market benchmark with the aim to minimize tracking error given our ESG implementation approach. This does result in tracking error vs the broader benchmark, but does in our view give investors a honest overview and insights into what the impact of our ESG approach is with regards to the relative performances. Next to this, the flexibility of implementing our own ESG policy in our funds, in our view, gives us a leg up vs ESG benchmarks, which mostly have strict and rigid policies on the implementation of benchmark changes. From our side it presents the challenge of explaining why we do this, this way, but our view is that this is the most honest way to present esg integration in a passive investment strategy.

POST-INVESTMENT

ESG RISK MANAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 9	CORE	OO 17.1 LE, OO 21	N/A	PUBLIC	ESG risk management	1

What compliance processes do you have in place to ensure that your listed equity assets subject to negative exclusionary screens meet the screening criteria?

- (A) We have internal compliance procedures that ensure all funds or portfolios that are subject to negative exclusionary screening have pre-trade checks
- (B) We have an external committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening
- (C) We have an independent internal committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening
- (D) We do not have compliance processes in place to ensure that we meet our stated negative exclusionary screens

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 10	CORE	OO 21	N/A	PUBLIC	ESG risk management	1

For the majority of your listed equity assets, do you have a formal process to identify and incorporate material ESG risks and ESG incidents into your risk management process?

(2) Active - fundamental

(A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual listed equity holdings

(B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for other listed equity holdings exposed to similar risks and/or incidents

(C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for our stewardship activities

(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents

(E) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process; our investment professionals identify and incorporate material ESG risks and ESG incidents at their discretion

(F) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process

o

PERFORMANCE MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 11	PLUS	OO 21	N/A	PUBLIC	Performance monitoring	1

Provide an example of how the incorporation of ESG factors in your listed equity valuation or portfolio construction affected the realised returns of those assets.

Material ESG factors and their impact on the eligible stocks in the investment universe, has resulted in a structural underweight in for instance the Energy sector. Other than that, the Carbon transition pathway is implemented for all of our passive equity strategies, which can result in underweights in high emitters still eligible for investments or overweights of low emitting companies. In the last reporting year this has been a drag on performance given the major shock in oil prices and the underweight in our passive portfolios.

In addition to last year, within our impact equity portfolios we specifically focus on companies that offer products and services that provide solution to the transition to a sustainable transition.

And what we have seen in the past couple of years, is that even though the long term tailwinds of investments into renewable energy and for instance energy efficiency given the IRA, the EU green deal, the push from China but also frankly the major impacts of climate change that will materialize in the coming decades, the market has been ignoring these specific stocks. The margin pressure for turbine manufacturers, but also the increase in rates all ensured that longer term valuations were cut due to the higher discount rate. Our estimation still stands that in order to even get to achieving the SDGs there is an investment need of trillions of dollars in order to even come close.

We do feel that the incorporation of ESG factors in our strategies bring meaningful added value to our returns, but within a longer term horizon where patient capital is rewarded.

DISCLOSURE OF ESG SCREENS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 12	CORE	OO 17 LE, OO 21	N/A	PUBLIC	Disclosure of ESG screens	6

For all your listed equity assets subject to ESG screens, how do you ensure that clients understand ESG screens and their implications?

- (A) We share a list of ESG screens
- (B) We share any changes in ESG screens
- (C) We explain any implications of ESG screens, such as their deviation from a benchmark or impact on sector weightings
- (D) We do not share the above information for all our listed equity assets subject to ESG screens

FIXED INCOME (FI)

OVERALL APPROACH

MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 1	CORE	OO 21	N/A	PUBLIC	Materiality analysis	1

Does your organisation have a formal investment process to identify and incorporate material ESG factors across your fixed income assets?

	(1) SSA	(2) Corporate	(4) Private debt
(A) Yes, our investment process incorporates material governance factors	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(B) Yes, our investment process incorporates material environmental and social factors	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM

(C) Yes, our investment process incorporates material ESG factors depending on different investment time horizons (1) for all of our AUM (1) for all of our AUM (1) for all of our AUM

(D) No, we do not have a formal process; our investment professionals identify material ESG factors at their discretion ○ ○ ○

(E) No, we do not have a formal or informal process to identify and incorporate material ESG factors ○ ○ ○

MONITORING ESG TRENDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 2	CORE	OO 21	N/A	PUBLIC	Monitoring ESG trends	1

Does your organisation have a formal process for monitoring and reviewing the implications of changing ESG trends across your fixed income assets?

(1) SSA

(2) Corporate

(A) Yes, we have a formal process that includes scenario analyses (2) for a majority of our AUM (1) for all of our AUM

(B) Yes, we have a formal process, but does it not include scenario analyses

(C) We do not have a formal process for our fixed income assets; our investment professionals monitor how ESG trends vary over time at their discretion ○ ○

(D) We do not monitor and review the implications of changing ESG trends on our fixed income assets

○

○

PRE-INVESTMENT

ESG INCORPORATION IN RESEARCH

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 3	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

For the majority of your fixed income investments, does your organisation incorporate material ESG factors when assessing their credit quality?

	(1) SSA	(2) Corporate	(4) Private debt
(A) We incorporate material environmental and social factors	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) We incorporate material governance-related factors	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) We do not incorporate material ESG factors for the majority of our fixed income investments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 4	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

Does your organisation have a framework that differentiates ESG risks by issuer country, region and/or sector?

	(1) SSA	(2) Corporate	(4) Private debt
(A) Yes, we have a framework that differentiates ESG risks by country and/or region (e.g. local governance and labour practices)	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(B) Yes, we have a framework that differentiates ESG risks by sector	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(C) No, we do not have a framework that differentiates ESG risks by issuer country, region and/or sector	○	○	○
(D) Not applicable; we are not able to differentiate ESG risks by issuer country, region and/or sector due to the limited universe of our issuers	○	○	○

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 5	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

How does your organisation incorporate material ESG factors when selecting private debt investments during the due diligence phase?

(A) We use a qualitative ESG checklist

Select from dropdown list:

- (1) in all cases**
- (2) in a majority of cases
- (3) in a minority of cases

(B) We assess quantitative information on material ESG factors, such as energy consumption, carbon footprint and gender diversity

Select from dropdown list:

- (1) in all cases**
- (2) in a majority of cases
- (3) in a minority of cases

(C) We check whether the target company has its own responsible investment policy, sustainability policy or ESG policy

Select from dropdown list:

- (1) in all cases
- (2) in a majority of cases
- (3) in a minority of cases

(D) We hire third-party consultants to do technical due diligence on specific material ESG factors where internal capabilities are not available

Select from dropdown list:

- (1) in all cases
- (2) in a majority of cases
- (3) in a minority of cases

(E) We require the review and sign-off of our ESG due diligence process by our investment committee, or the equivalent function

Select from dropdown list:

- (1) in all cases
- (2) in a majority of cases
- (3) in a minority of cases

(F) We use industry-recognised responsible investment due diligence questionnaire (DDQ) templates

(G) We use another method of incorporating material ESG factors when selecting private debt investments during the due diligence process

Specify:

In all cases, we use our own propriety impact & ESG assessment tool

Select from dropdown list:

- (1) in all cases
- (2) in a majority of cases
- (3) in a minority of cases

(H) We do not incorporate material ESG factors when selecting private debt investments during the due diligence phase

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 6	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

How do you incorporate significant changes in material ESG factors over time into your fixed income asset valuation process?

	(1) SSA	(2) Corporate	(3) Private debt
(A) We incorporate it into the forecast of financial metrics or other quantitative assessments	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(B) We make a qualitative assessment of how material ESG factors may evolve	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(C) We do not incorporate significant changes in material ESG factors	o	o	o

ESG INCORPORATION IN PORTFOLIO CONSTRUCTION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 8	CORE	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

How do material ESG factors contribute to your security selection, portfolio construction and/or benchmark selection process?

	(1) SSA	(2) Corporate
(A) Material ESG factors contribute to the selection of individual assets and/or sector weightings within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM
(B) Material ESG factors contribute to determining the holding period of individual assets within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM

(C) Material ESG factors contribute to the portfolio weighting of individual assets within our portfolio construction and/or benchmark selection process (1) for all of our AUM (1) for all of our AUM

(D) Material ESG factors contribute to the country or region weighting of assets within our portfolio construction and/or benchmark selection process (1) for all of our AUM (1) for all of our AUM

(E) Material ESG factors contribute to our portfolio construction and/or benchmark selection process in other ways (3) for a minority of our AUM (1) for all of our AUM

(F) Our security selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors ○ ○

(E) Material ESG factors contribute to our portfolio construction and/or benchmark selection process in other ways - Specify:

A sustainable benchmark is chosen for the impact credit fund

PASSIVE INVESTMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 9	PLUS	OO 5.3 FI, OO 21	N/A	PUBLIC	Passive investments	1

Provide an example of how material ESG factors influenced weightings and tilts in the design of your passively managed funds.

The selection of individual issuers is based on the Cardano Sustainable Investment Framework and the complementing Cardano Sustainable Bond Framework. This implies that all issuers in the fixed income funds pass the Cardano screening process and the bonds issued by the issuers pass an extra screening process. As part of these frameworks no sectors are fully excluded, but only those that pass the strict sustainability thresholds are investable. As a result, sectors with more sustainable issuers are overweighed in the funds. In addition, the funds have targets to outperform the ESG score of the benchmark, leading to a tilt towards higher scoring issuers and bonds with more ambitious targets and more sustainable frameworks.

POST-INVESTMENT

ESG RISK MANAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 11	CORE	OO 21	N/A	PUBLIC	ESG risk management	1

How are material ESG factors incorporated into your portfolio risk management process?

	(1) SSA	(2) Corporate	(4) Private debt
(A) Investment committee members, or the equivalent function or group, can veto investment decisions based on ESG considerations	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(B) Companies, sectors, countries and/or currencies are monitored for changes in exposure to material ESG factors and any breaches of risk limits	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(C) Overall exposure to specific material ESG factors is measured for our portfolio construction, and sizing or hedging adjustments are made depending on the individual issuer or issue sensitivity to these factors	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(D) We use another method of incorporating material ESG factors into our portfolio's risk management process			
(E) We do not have a process to incorporate material ESG factors into our portfolio's risk management process	o	o	o

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 12	CORE	OO 21	N/A	PUBLIC	ESG risk management	1

For the majority of your fixed income assets, do you have a formal process to identify and incorporate material ESG risks and ESG incidents into your risk management process?

	(1) SSA	(2) Corporate	(4) Private debt
(A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual fixed income holdings	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents, and their implications for other fixed income holdings exposed to similar risks and/or incidents	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents, and their implications for our stewardship activities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(E) We do not have a formal process to identify and incorporate ESG risks and ESG incidents; our investment professionals identify and incorporate ESG risks and ESG incidents at their discretion

○

○

○

(F) We do not have a formal process to identify and incorporate ESG risks and ESG incidents into our risk management process

○

○

○

PERFORMANCE MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 13	CORE	OO 21	N/A	PUBLIC	Performance monitoring	1

During the reporting year, how did your organisation incorporate material ESG factors when monitoring private debt investments?

(A) We used a qualitative ESG checklist

Select from dropdown list:

- (1) in all cases
- (2) in the majority of cases
- (3) in the minority of cases

(B) We assessed quantitative information on material ESG factors, such as energy consumption, carbon footprint and gender diversity

Select from dropdown list:

- (1) in all cases
- (2) in the majority of cases
- (3) in the minority of cases

(C) We hired third-party consultants to do technical assessment on specific material ESG factors where internal capabilities were not available

Select from dropdown list:

- (1) in all cases
- (2) in the majority of cases
- (3) in the minority of cases

(D) We used industry body guidelines

Select from dropdown list:

- (1) in all cases
- (2) in the majority of cases
- (3) in the minority of cases

(E) We used another method to incorporate material ESG factors into the monitoring of private debt investments

- (F) We did not incorporate material ESG factors when monitoring private debt investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 14	PLUS	OO 5.3 FI, OO 21	N/A	PUBLIC	Performance monitoring	1

Provide an example of how the incorporation of environmental and/or social factors in your fixed income valuation or portfolio construction affected the realised returns of those assets.

As an example, when Thames Water issued a new bond, we have not purchased the bond because the assessment and valuation showed that we expected high risks. Similarly, Credit Suisse has been excluded by Cardano already a long time before they came in financial problems. Both decisions positively impacted the realised returns of our portfolios.

THEMATIC BONDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 15	PLUS	OO 20, OO 21	N/A	PUBLIC	Thematic bonds	3

What percentage of environmental, social and/or other labelled thematic bonds held by your organisation has been verified?

As a percentage of your total labelled bonds:

(A) Third-party assurance	(5) >75%
(B) Second-party opinion	(5) >75%
(C) Approved verifiers or external reviewers (e.g. via CBI or ICMA)	(5) >75%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 16	CORE	OO 17 FI, OO 21	N/A	PUBLIC	Thematic bonds	1

What pre-determined criteria does your organisation use to identify which non-labelled thematic bonds to invest in?

- (A) The bond's use of proceeds
- (B) The issuers' targets
- (C) The issuers' progress towards achieving their targets
- (D) The issuer profile and how it contributes to their targets
- (E) We do not use pre-determined criteria to identify which non-labelled thematic bonds to invest in
- (F) **Not applicable; we do not invest in non-labelled thematic bonds**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 17	CORE	Multiple, see guidance	N/A	PUBLIC	Thematic bonds	1, 2, 6

During the reporting year, what action did you take in the majority of cases when you felt that the proceeds of a thematic bond were not allocated appropriately or in accordance with the terms of the bond deal or prospectus?

- (A) We engaged with the issuer
- (B) We alerted thematic bond certification agencies
- (C) We sold the security
- (D) We blacklisted the issuer
- (E) Other action
- (F) We did not take any specific actions when the proceeds of a thematic bond were not allocated according to the terms of the bond deal during the reporting year
- (G) Not applicable; in the majority of cases, the proceeds of thematic bonds were allocated according to the terms of the bond deal during the reporting year

DISCLOSURE OF ESG SCREENS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 18	CORE	OO 17 FI, OO 21	N/A	PUBLIC	Disclosure of ESG screens	6

For all your fixed income assets subject to ESG screens, how do you ensure that clients understand ESG screens and their implications?

- (A) We share a list of ESG screens
- (B) We share any changes in ESG screens
- (C) We explain any implications of ESG screens, such as any deviation from a benchmark or impact on sector weightings
- (D) We do not share the above information for all our fixed income assets subject to ESG screens

SUSTAINABILITY OUTCOMES (SO)

SETTING TARGETS AND TRACKING PROGRESS

SETTING TARGETS ON SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 1	PLUS	PGS 48	SO 2, SO 2.1, SO 3	PUBLIC	Setting targets on sustainability outcomes	1, 2

What specific sustainability outcomes connected to its investment activities has your organisation taken action on?

(A) Sustainability outcome #1

- (1) Widely recognised frameworks used to guide action on this sustainability outcome
 - (1) The UN Sustainable Development Goals (SDGs) and targets
 - (2) The UNFCCC Paris Agreement**
 - (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
 - (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
 - (5) The EU Taxonomy
 - (6) Other relevant taxonomies
 - (7) The International Bill of Human Rights
 - (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
 - (9) The Convention on Biological Diversity
 - (10) Other international, regional, sector-based or issue-specific framework(s)
- (2) Classification of sustainability outcome
 - (1) Environmental**
 - (2) Social
 - (3) Governance-related
 - (4) Other
- (3) Sustainability outcome name
 - Net zero greenhouse gas emissions
- (4) Number of targets set for this outcome
 - (1) No target
 - (2) One target**
 - (3) Two or more targets

(B) Sustainability outcome #2

- (1) Widely recognised frameworks used to guide action on this sustainability outcome
 - (1) The UN Sustainable Development Goals (SDGs) and targets**
 - (2) The UNFCCC Paris Agreement
 - (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
 - (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
 - (5) The EU Taxonomy
 - (6) Other relevant taxonomies
 - (7) The International Bill of Human Rights

- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) **Environmental**
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

Water neutrality

(4) Number of targets set for this outcome

- (1) No target
- (2) One target
- (3) **Two or more targets**

(C) **Sustainability outcome #3**

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) The UN Sustainable Development Goals (SDGs) and targets
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights
- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) **The Convention on Biological Diversity**
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) **Environmental**
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

Reverse the trend of biodiversity loss

(4) Number of targets set for this outcome

- (1) No target
- (2) **One target**
- (3) Two or more targets

(D) **Sustainability outcome #4**

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) **The UN Sustainable Development Goals (SDGs) and targets**
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights

- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) **Environmental**
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

Increase circularity

(4) Number of targets set for this outcome

- (1) **No target**
- (2) One target
- (3) Two or more targets

(E) Sustainability outcome #5

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) The UN Sustainable Development Goals (SDGs) and targets
- (2) The UNFCCC Paris Agreement
- (3) **The UN Guiding Principles on Business and Human Rights (UNGPs)**
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights
- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) Environmental
- (2) **Social**
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

Global Compact Compliance

(4) Number of targets set for this outcome

- (1) No target
- (2) **One target**
- (3) Two or more targets

(F) Sustainability outcome #6

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) **The UN Sustainable Development Goals (SDGs) and targets**
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights

- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) Environmental
- (2) Social**
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

Promote improvements in social capital

(4) Number of targets set for this outcome

- (1) No target**
- (2) One target
- (3) Two or more targets

(G) Sustainability outcome #7

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) The UN Sustainable Development Goals (SDGs) and targets**
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights
- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) Environmental
- (2) Social**
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

Promote improvements in human capital

(4) Number of targets set for this outcome

- (1) No target**
- (2) One target
- (3) Two or more targets

(H) Sustainability outcome #8

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) The UN Sustainable Development Goals (SDGs) and targets
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors**
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights

- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)
- (2) Classification of sustainability outcome
 - (1) Environmental
 - (2) Social
 - (3) **Governance-related**
 - (4) Other
- (3) Sustainability outcome name
 - Promote good governance
- (4) Number of targets set for this outcome
 - (1) **No target**
 - (2) One target
 - (3) Two or more targets
- (I) Sustainability outcome #9
- (J) Sustainability outcome #10

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 2	PLUS	SO 1	SO 2.1, SO 4, SO 5	PUBLIC	Setting targets on sustainability outcomes	1

For each sustainability outcome, provide details of up to two of your nearest-term targets.

(A1) Sustainability Outcome #1: Target details

(A1) Sustainability Outcome #1:	Net zero greenhouse gas emissions
(1) Target name	Scope 1 and 2 greenhouse gas emissions intensity
(2) Baseline year	2019
(3) Target to be met by	2030
(4) Methodology	PCAF method to measure greenhouse gas emissions and intensity based on EVIC
(5) Metric used (if relevant)	Tonnes of portfolio financed greenhouse gas emissions, based on enterprise value, per million Euro invested value

(6) Absolute or intensity-based (if relevant)	(2) Intensity-based
(7) Baseline level or amount (if relevant):	68 tonnes of financed scope 1 and 2 ghg emissions per m€ of invested value for the directly managed assets
(8) Target level or amount (if relevant)	-50% by 2030, or 34 tonnes of financed scope 1 and 2 ghg emissions per m€ of invested value for the directly managed assets
(9) Percentage of total AUM covered in your baseline year for target setting	100%
(10) Do you also have a longer-term target for this?	(1) Yes
(B1) Sustainability Outcome #2: Target details	
(B1) Sustainability Outcome #2:	Water neutrality
(1) Target name	Water risk assessment
(2) Baseline year	2021
(3) Target to be met by	2030
(4) Methodology	Estimate the share of the portfolio companies in high-risk sectors in water-stressed areas that have assessed water quantity risks and impacts
(5) Metric used (if relevant)	Share of companies in the investment universe
(6) Absolute or intensity-based (if relevant)	
(7) Baseline level or amount (if relevant):	76% of the portfolio companies in high-risk sectors in water-stressed areas have assessed water quantity risks and impacts, for our directly managed assets
(8) Target level or amount (if relevant)	By 2030 100% of the portfolio companies in high-risk sectors in water-stressed areas have assessed water quantity risks and impacts, for our directly managed assets

(9) Percentage of total AUM covered in your baseline year for target setting 100%

(10) Do you also have a longer-term target for this? (2) No

(B2) Sustainability Outcome #2: Target details

(B2) Sustainability Outcome #2: Water neutrality

(1) Target name Water targets

(2) Baseline year 2021

(3) Target to be met by 2030

(4) Methodology Estimate the share of the portfolio companies in high-risk sectors in water-stressed areas that have set water-related targets

(5) Metric used (if relevant) Share of companies

(6) Absolute or intensity-based (if relevant)

(7) Baseline level or amount (if relevant): 62% of the portfolio companies in high-risk sectors in water-stressed areas have set water-related targets, for our directly managed assets

(8) Target level or amount (if relevant) By 2030, 100% of the portfolio companies in high-risk sectors in water-stressed areas have set water-related targets, for our directly managed assets

(9) Percentage of total AUM covered in your baseline year for target setting 100%

(10) Do you also have a longer-term target for this? (2) No

(C1) Sustainability Outcome #3: Target details

(C1) Sustainability Outcome #3:	Reverse the trend of biodiversity loss
(1) Target name	Biodiversity management
(2) Baseline year	2022
(3) Target to be met by	2030
(4) Methodology	Estimate the share of companies that properly manage their biodiversity related risks (as defined in our biodiversity strategies); the biodiversity management score used is based on a proprietary method.
(5) Metric used (if relevant)	Share of companies
(6) Absolute or intensity-based (if relevant)	
(7) Baseline level or amount (if relevant):	12% of the portfolio companies in our directly managed assets properly manage their biodiversity-related risks.
(8) Target level or amount (if relevant)	By 2030, the share of portfolio companies that properly manage their biodiversity-related risks should significantly increase in order to reverse the trend of biodiversity loss
(9) Percentage of total AUM covered in your baseline year for target setting	100%
(10) Do you also have a longer-term target for this?	(2) No

(E1) Sustainability Outcome #5: Target details

(E1) Sustainability Outcome #5:	Global Compact Compliance
(1) Target name	Global Compact Compliance
(2) Baseline year	

(3) Target to be met by

(4) Methodology

The number of companies that fails at least one of the UN Global Compact Principles. At no moment in investee companies are allowed to fail UN Global Compact. If we find out that they violate UNGP according to our data provider, they will be assessed and a the Sustainability Classification Committee decides whether indeed the controversies are strong enough for a Global Compact Fail status.

(5) Metric used (if relevant)

number of companies

(6) Absolute or intensity-based (if relevant)

(7) Baseline level or amount (if relevant):

No companies in our directly managed assets fail on at least on of the UN Global Compact Principles

(8) Target level or amount (if relevant)

No companies in our directly managed assets fail on at least on of the UN Global Compact Principles

(9) Percentage of total AUM covered in your baseline year for target setting

100%

(10) Do you also have a longer-term target for this?

(2) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 2.1	PLUS	SO 1, SO 2	N/A	PUBLIC	Setting targets on sustainability outcomes	1

For each sustainability outcome, provide details of up to two of your long-term targets.

	(1) Target name	(2) Long-term target to be met by	(3) Long-term target level or amount (if relevant)
(A1) Sustainability Outcome #1: Net zero greenhouse gas emissions	Scope 1 and 2 greenhouse gas emissions intensity	2050	net-zero greenhouse gas emissions

FOCUS: SETTING NET-ZERO TARGETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 3	PLUS	SO 1	Multiple, see guidance	PUBLIC	Focus: Setting net-zero targets	General

If relevant to your organisation, you can opt-in to provide further details on your net-zero targets.

- (A) Yes, we would like to provide further details on our organisation's asset class-specific net-zero targets
- (B) Yes, we would like to provide further details on our organisation's net-zero targets for high-emitting sectors**
- (C) Yes, we would like to provide further details on our organisation's mandate or fund-specific net-zero targets
- (D) No, we would not like to provide further details on our organisation's asset class, high-emitting sectors or mandate or fund-specific net-zero targets
- (E) No, our organisation does not have any asset class, high-emitting sectors or mandate or fund-specific net-zero targets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
NZAM 1	PLUS	NZAM, SO 3	SO 3.1, SO 3.2	PUBLIC	Focus: Setting net-zero targets	General

Select the relevant asset class breakdown for your organisation to report on your net-zero targets.

- (A) PRI's standard asset class breakdown**
- (B) Asset class breakdown as per the NZAOA's Target Setting Protocol

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 3.2	PLUS	SO 3	N/A	PUBLIC	Focus: Setting net-zero targets	General

Provide details of your nearest-term net-zero targets for high-emitting sectors.

- (A) Coal**

Target details

(A) Coal

(1) Baseline year 2022

(2) Target to be met by 2030

(3) Emissions included in target (1) Scope 1
(2) Scope 2
(3) Scope 3

(4) Methodology Phase-out of investments of companies that have revenues from thermal coal related activities

(5) Metric used (9) Other

(6) Baseline amount not known

(7) Current amount (if different from baseline amount) 18 companies had still at least some thermal coal related revenues; every year, the threshold of maximum coal-related revenues decreases

(8) Targeted reduction with respect to baseline 100%

(9) Asset classes covered Listed equity
Fixed income

(B) Gas

(C) Oil

(D) Combined oil and gas

Target details

(D) Combined oil and gas

(1) Baseline year 2022

(2) Target to be met by 2030

(3) Emissions included in target (1) Scope 1
(2) Scope 2
(3) Scope 3

(4) Methodology	Share of portfolio companies from the directly managed assets from the oil, gas & consumable fuels sector that has set science-based climate targets according to SBTi, CA100+ or CDP	
(5) Metric used		(9) Other
(6) Baseline amount	25%	
(7) Current amount (if different from baseline amount)	25%	
(8) Targeted reduction with respect to baseline	100%	
(9) Asset classes covered		Listed equity Fixed income

(E) Utilities

Target details

(E) Utilities

(1) Baseline year	2022	
(2) Target to be met by	2030	
(3) Emissions included in target		(1) Scope 1 (2) Scope 2 (3) Scope 3
(4) Methodology	Share of portfolio companies from the directly managed assets from the utilities sectors that has set science-based climate targets according to SBTi, CA100+ or CDP	
(5) Metric used		(9) Other
(6) Baseline amount	23%	
(7) Current amount (if different from baseline amount)	23%	
(8) Targeted reduction with respect to baseline	100%	

(9) Asset classes covered

Listed equity
Fixed income

(F) Cement

Target details

(F) Cement

(1) Baseline year 2022

(2) Target to be met by 2030

(3) Emissions included in target (1) Scope 1
(2) Scope 2
(3) Scope 3

(4) Methodology Share of portfolio companies from the directly managed assets from the construction sector that has set science-based climate targets according to SBTi, CA100+ or CDP

(5) Metric used (9) Other

(6) Baseline amount 36%

(7) Current amount (if different from baseline amount) 36%

(8) Targeted reduction with respect to baseline 100%

(9) Asset classes covered Listed equity
Fixed income

(G) Steel

Target details

(G) Steel

(1) Baseline year 2022

(2) Target to be met by 2030

(3) Emissions included in target (1) Scope 1
(2) Scope 2
(3) Scope 3

(4) Methodology Share of portfolio companies from the directly managed assets from the metals & mining sector that has set science-based climate targets according to SBTi, CA100+ or CDP

(5) Metric used (9) Other

(6) Baseline amount 8%

(7) Current amount (if different from baseline amount) 8%

(8) Targeted reduction with respect to baseline 100%

(9) Asset classes covered Listed equity
Fixed income

(H) Aviation

Target details

(H) Aviation

(1) Baseline year 2022

(2) Target to be met by 2030

(3) Emissions included in target (1) Scope 1
(2) Scope 2
(3) Scope 3

(4) Methodology Share of portfolio companies from the directly managed assets from the airlines sector that has set science-based climate targets according to SBTi, CA100+ or CDP

(5) Metric used (9) Other

(6) Baseline amount 38%

(7) Current amount (if different from baseline amount)	38%
--	-----

(8) Targeted reduction with respect to baseline	100%
---	------

(9) Asset classes covered	Listed equity Fixed income
---------------------------	-------------------------------

- (I) Heavy duty road
- (J) Light duty road
- (K) Shipping
- (L) Combined aviation, heavy duty road, light duty road and shipping**

Target details

(L) Combined aviation, heavy duty road, light duty road and shipping

(1) Baseline year	2022
-------------------	------

(2) Target to be met by	2030
-------------------------	------

(3) Emissions included in target	(1) Scope 1 (2) Scope 2 (3) Scope 3
----------------------------------	---

(4) Methodology	Share of portfolio companies from the directly managed assets from the transportation & logistics sector that has set science-based climate targets according to SBTi, CA100+ or CDP
-----------------	--

(5) Metric used	(9) Other
-----------------	-----------

(6) Baseline amount	13%
---------------------	-----

(7) Current amount (if different from baseline amount)	13%
--	-----

(8) Targeted reduction with respect to baseline	100%
---	------

(9) Asset classes covered	Listed equity Fixed income
---------------------------	-------------------------------

- (M) Aluminium
- (N) Agriculture, forestry, and fishery
- (O) Chemicals**

Target details

(O) Chemicals

(1) Baseline year 2022

(2) Target to be met by 2030

(3) Emissions included in target (1) Scope 1
(2) Scope 2
(3) Scope 3

(4) Methodology Share of portfolio companies from the directly managed assets from the chemicals sector that has set science-based climate targets according to SBTi, CA100+ or CDP

(5) Metric used (9) Other

(6) Baseline amount 23%

(7) Current amount (if different from baseline amount) 23%

(8) Targeted reduction with respect to baseline 100%

(9) Asset classes covered Listed equity
Fixed income

- (P) Construction and buildings
- (Q) Textile and leather
- (R) Water

TRACKING PROGRESS AGAINST TARGETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 4	PLUS	SO 2	SO 4.1	PUBLIC	Tracking progress against targets	1

Does your organisation track progress against your nearest-term sustainability outcomes targets?

(A1) Sustainability outcome #1:

(A1) Sustainability outcome #1: Net zero greenhouse gas emissions

Target name: Scope 1 and 2 greenhouse gas emissions intensity

Does your organisation track progress against your nearest-term sustainability outcome targets? (1) Yes

(B1) Sustainability outcome #2:

(B1) Sustainability outcome #2: Water neutrality

Target name: Water risk assessment

Does your organisation track progress against your nearest-term sustainability outcome targets? (1) Yes

(B2) Sustainability outcome #2:

(B2) Sustainability outcome #2: Water neutrality

Target name: Water targets

Does your organisation track progress against your nearest-term sustainability outcome targets? (1) Yes

(C1) Sustainability outcome #3:

(C1) Sustainability outcome #3: Reverse the trend of biodiversity loss

Target name: Biodiversity management

Does your organisation track progress against your nearest-term sustainability outcome targets? (1) Yes

(E1) Sustainability outcome #5:

(E1) Sustainability outcome #5: Global Compact Compliance

Target name: Global Compact Compliance

Does your organisation track progress against your nearest-term sustainability outcome targets? (1) Yes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 4.1	PLUS	SO 4	N/A	PUBLIC	Tracking progress against targets	1

During the reporting year, what qualitative or quantitative progress did your organisation achieve against your nearest-term sustainability outcome targets?

(A1) Sustainability Outcome #1: Target details

(A1) Sustainability Outcome #1:	Net zero greenhouse gas emissions
(1) Target name	Scope 1 and 2 greenhouse gas emissions intensity
(2) Target to be met by	2030
(3) Metric used (if relevant)	Tonnes of portfolio financed greenhouse gas emissions, based on enterprise value, per million Euro invested value
(4) Current level or amount (if relevant)	-22%
(5) Other qualitative or quantitative progress	
(6) Methodology for tracking progress	Monitor changes in carbon intensity of internally managed assets

(B1) Sustainability Outcome #2: Target details

(B1) Sustainability Outcome #2:	Water neutrality
(1) Target name	Water risk assessment
(2) Target to be met by	2030
(3) Metric used (if relevant)	Share of companies in the investment universe
(4) Current level or amount (if relevant)	88%
(5) Other qualitative or quantitative progress	
(6) Methodology for tracking progress	Monitor changes in number of companies with proper water risk assessments

(B2) Sustainability Outcome #2: Target details

(B2) Sustainability Outcome #2:	Water neutrality
(1) Target name	Water targets
(2) Target to be met by	2030
(3) Metric used (if relevant)	Share of companies
(4) Current level or amount (if relevant)	66%
(5) Other qualitative or quantitative progress	
(6) Methodology for tracking progress	Monitor changes in number of companies with proper water targets

(C1) Sustainability Outcome #3: Target details

(C1) Sustainability Outcome #3:	Reverse the trend of biodiversity loss
(1) Target name	Biodiversity management
(2) Target to be met by	2030
(3) Metric used (if relevant)	Share of companies
(4) Current level or amount (if relevant)	12%
(5) Other qualitative or quantitative progress	
(6) Methodology for tracking progress	monitor share of companies in directly managed assets that have proper biodiversity management (note that the current year is equal to the starting year)

(E1) Sustainability Outcome #5: Target details

(E1) Sustainability Outcome #5:	Global Compact Compliance
(1) Target name	Global Compact Compliance
(2) Target to be met by	
(3) Metric used (if relevant)	number of companies
(4) Current level or amount (if relevant)	100%
(5) Other qualitative or quantitative progress	
(6) Methodology for tracking progress	Companies not complying with Global Compact are excluded from investments

INDIVIDUAL AND COLLABORATIVE INVESTOR ACTION ON OUTCOMES

LEVERS USED TO TAKE ACTION ON SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 5	PLUS	SO 2	Multiple	PUBLIC	Levers used to take action on sustainability outcomes	1, 2, 5

During the reporting year, which of the following levers did your organisation use to take action on sustainability outcomes, including to prevent and mitigate actual and potential negative outcomes?

- (A) Stewardship with investees, including engagement, (proxy) voting, and direct influence with privately held assets
Select from drop down list:
 - (1) Individually
 - (2) With other investors or stakeholders
- (B) Stewardship: engagement with external investment managers
Select from drop down list:
 - (1) Individually
 - (2) With other investors or stakeholders
- (C) Stewardship: engagement with policy makers
Select from drop down list:
 - (1) Individually
 - (2) With other investors or stakeholders
- (D) Stewardship: engagement with other key stakeholders

Select from drop down list:

- (1) Individually
- (2) With other investors or stakeholders
- (E) Capital allocation
- (F) Our organisation did not use any of the above levers to take action on sustainability outcomes during the reporting year

CAPITAL ALLOCATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 6	PLUS	SO 5	N/A	PUBLIC	Capital allocation	1

During the reporting year, how did your organisation use capital allocation to take action on sustainability outcomes, including to prevent and mitigate actual and potential negative outcomes?

(A) Across all sustainability outcomes

(1) Capital allocation activities used

(2) Sector allocation
(4) Divestment from assets or sectors

(2) Explain through an example

Based on our sustainability framework, only those companies that comply with our sustainability framework are investable for our funds and mandates. The gambling and tobacco sectors are fully excluded. No other sector is fully excluded, but for instance only 5 oil majors comply with our sustainability screen. The others are all divested. Similarly, agro-food producers are only investable if they actively prevent further deforestation.

(B) Sustainability Outcome #1:

(B) Sustainability Outcome #1:

Net zero greenhouse gas emissions

(1) Capital allocation activities used

(2) Sector allocation
(4) Divestment from assets or sectors

(2) Explain through an example

We have formulated strict thresholds for instance for the share of revenues from coal activities, the transition steps towards a low-carbon economy a company is taking, and the climate-related strategies and targets companies are formulating. Companies that do not comply are excluded. We do not exclude specific sectors but allocate more to the segments of sectors that are making the transition towards sustainable ways of operating.

(C) Sustainability Outcome #2:

(C) Sustainability Outcome #2: Water neutrality

(1) Capital allocation activities used

(2) Sector allocation
(4) Divestment from assets or sectors

(2) Explain through an example

We carefully consider whether companies mitigate their water-related risks. For instance, water-intensive semiconductor companies in water scarce areas may be divested or engaged if they do not properly mitigate their water risks.

(D) Sustainability Outcome #3:

(D) Sustainability Outcome #3: Reverse the trend of biodiversity loss

(1) Capital allocation activities used

(2) Sector allocation
(4) Divestment from assets or sectors

(2) Explain through an example

We carefully consider whether companies mitigate their biodiversity-related risks. For this we consider all drivers of biodiversity loss. For instance, agro-food companies that do not properly manage deforestation-risks in their supply chain may be divested.

(E) Sustainability Outcome #4:

(E) Sustainability Outcome #4: Increase circularity

(1) Capital allocation activities used

(2) Sector allocation
(4) Divestment from assets or sectors

(2) Explain through an example

We carefully consider how companies manage pollution, recycling, reuse and innovations in materials use. For instance, plastic producers insufficiently considering the potential impact of their products, that insufficiently innovate on recyclable, biodegradable or less harmful types of plastics may eventually be divested from.

(F) Sustainability Outcome #5:

(F) Sustainability Outcome #5: Global Compact Compliance

(1) Capital allocation activities used

(2) Sector allocation
(4) Divestment from assets or sectors

(2) Explain through an example

We carefully consider whether companies are complying with the Global Compact Principles. For companies that are found to violate any of the principles, it is investigated whether they make the necessary steps to undo the violations and prevent any new violations. Those that take insufficient action, will be excluded from investments.

(G) Sustainability Outcome #6:

(G) Sustainability Outcome #6: Promote improvements in social capital

(1) Capital allocation activities used

(2) Explain through an example

We carefully consider to what extent companies manage risks related to privacy & data security, product safety, accessibility & affordability of basic services, controversial sourcing and community relations. For instance banks or IT companies taking insufficient action to prevent data breaches or tech companies that insufficiently consider the potential human rights impacts of controversial sourcing of minerals may be excluded.

(H) Sustainability Outcome #7:

(H) Sustainability Outcome #7: Promote improvements in human capital

(1) Capital allocation activities used

(2) Sector allocation
(4) Divestment from assets or sectors

(2) Explain through an example

We carefully consider to what extent companies manage risks related to human capital development, labour management, health & safety of employees and supply chain labour related risks. Companies that insufficiently monitor potential human rights violations in their supply chain or that do not comply with labour management best practice may be excluded from investment.

(I) Sustainability Outcome #8:

(I) Sustainability Outcome #8: Promote good governance

(1) Capital allocation activities used

(2) Sector allocation
(4) Divestment from assets or sectors

(2) Explain through an example

We carefully consider governance strength and business ethics of companies as they create significant risks for our portfolios. Companies lacking whistleblowing and business ethics policies may be excluded from investment, especially if they are involved in ethics related controversies.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 7	PLUS	OO 17 FI, SO 1	N/A	PUBLIC	Capital allocation	1

During the reporting year, did you use thematic bonds to take action on sustainability outcomes, including to prevent and mitigate actual and potential negative outcomes?

Thematic bond(s) label

(A) Sustainability Outcome #1: Net zero greenhouse gas emissions

(A) Green/climate bonds
(C) Sustainability bonds
(D) Sustainability-linked bonds
(E) SDG or SDG-linked bonds

(B) Sustainability Outcome #2: Water neutrality

(A) Green/climate bonds
(C) Sustainability bonds
(E) SDG or SDG-linked bonds

(C) Sustainability Outcome #3: Reverse the trend of biodiversity loss

(A) Green/climate bonds
(C) Sustainability bonds
(D) Sustainability-linked bonds
(E) SDG or SDG-linked bonds

(D) Sustainability Outcome #4: Increase circularity

(A) Green/climate bonds
(C) Sustainability bonds
(D) Sustainability-linked bonds
(E) SDG or SDG-linked bonds

(E) Sustainability Outcome #5: Global Compact Compliance

(A) Green/climate bonds
(C) Sustainability bonds

(F) Sustainability Outcome #6:
Promote improvements in social capital

(B) Social bonds
(C) Sustainability bonds
(E) SDG or SDG-linked bonds

(G) Sustainability Outcome #7:
Promote improvements in human capital

(B) Social bonds
(C) Sustainability bonds

(H) Sustainability Outcome #8:
Promote good governance

STEWARDSHIP WITH INVESTEEES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 8	PLUS	SO 5	N/A	PUBLIC	Stewardship with investees	2

During the reporting year, how did your organisation use stewardship with investees to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

(A) Across all sustainability outcomes

(1) Describe your approach

(2) Stewardship tools or activities used

(3) Example

(B) Sustainability Outcome #1:

(B) Sustainability Outcome #1: Net zero greenhouse gas emissions

(1) Describe your approach

Cardano develops and implements multiple forms of engagement and regularly collaborates with investor peers and external stakeholders including NGOs and industry expert groups to strengthen our approach and achieve more tangible outcomes. Engagement if done well, can have an impact on corporate behaviour and achieve real world improvements.

We have a goal of achieving net zero emissions by 2050 for our portfolios, but we aim to do this in a way that achieves real world impacts by encouraging our investees to decrease both intensity and absolute emissions through their direct operations, their suppliers and the products and services they bring to market.

On the topic of climate and achieving net zero greenhouse gas emissions we lead, co-lead and participate in several initiatives including taking a leading role in the Climate Action 100+ group and the Dutch Climate Coalition among others. In order to increase our impact we combine the use of multiple stewardship tools including engagement, public statements, voting and co-filing shareholder resolutions.

(2) Stewardship tools or activities used

(1) Engagement
(2) (Proxy) voting at shareholder meetings
(3) Filing of shareholder resolutions or proposals

(3) Example

As an example, we are the co-lead engager for a large global agriculture company whose scope 3 emissions (stemming from deforestation) represent the vast majority of its total emissions. The company is a key player in the food sector, being considered a 'mega-trader' of soy and palm. It plays a major role in the decarbonisation of the food value chain by encouraging the farmers and suppliers it sources from to use sustainable land use practices and prevent deforestation to protect vital carbon sinks.

We are focused on achieving tangible results with this engagement and have seen successes in the past year. We have been engaging the company for several years and have seen some successes with the company's progress, such as the publication of medium term science-based targets in 2021 for scopes 1, 2 and 3. We were pleased with this progress, but still observed a lack of board oversight for climate and deforestation progress by the relevant committee members.

Due to this, we decided to vote against the members of this board committee during the 2022 voting season. Following further engagement, we co-filed a shareholder resolution towards the end of 2022 with the other lead engager, asking the company to set net zero targets. The company had set a medium term emissions reduction target but wasn't clear how it would decarbonise towards 2050 aligned with a 1.5 degrees scenario.

We decided to withdraw the resolution after multiple constructive conversations. We also received a written commitment that the company would develop a transition plan aligned with a 1.5°C scenario in the second half of 2023 and publicly announce this in its 2023 proxy statement. The company will involve participation from our investor group and Ceres as an outside expert.

There is not yet a commitment to set a net zero target, which is what the resolution asked for but we see the commitment to publish a transition plan a critical step on this path to credible and science based net zero targets.

Because of our resolution, there was an acceleration of timelines by the company and an escalation to the board for developing the plan. We were pleased to achieve concrete outcomes with this engagement.

(C) Sustainability Outcome #2:

(C) Sustainability Outcome #2: Water neutrality

(1) Describe your approach

In our direct equity and credit portfolios, we aim to achieve water-neutrality by 2030. Water neutrality means that businesses consume no more water than nature can replenish, and cause no more pollution or impacts than is acceptable for the health of humans and natural ecosystems. It is predicted that by that time, half of the world will face severe water stress if water is not used more efficiently. We use stewardship activities to help us reach this goal and achieve results and outcomes.

(2) Stewardship tools or activities used

(1) Engagement
(2) (Proxy) voting at shareholder meetings
(3) Filing of shareholder resolutions or proposals

(3) Example

We are a contributing member of the Valuing Water Finance Initiative Task Force and co-lead engager for two companies in the food / restaurant sector and active in an engagement with one company in the beverage sector. Cardano co-filed five shareholder resolutions for the 2022 proxy voting season. The filing of shareholder resolutions is a powerful tool that can be used in combination with engagement and voting to put important issues on the agenda of a company's board and management. One of the company's Cardano filed at was Chipotle Mexican Grill (Chipotle) asking it to conduct a thorough water risk assessment of its supply chain. As a food company, Chipotle sources ingredients from producers that require a large volume of water consumption to grow its ingredients ranging from rice, to chicken and beef for its menu offerings. A reliable supply of water is vital for its business and some of its suppliers operate in water-stressed regions. In previous discussions with Chipotle, it stated that it had ambitions for conducting a water risk assessment of suppliers to determine where its highest risks were but had not committed to a concrete timeline.

After filing the resolution, Cardano had multiple calls with the company. Chipotle's team accelerated its efforts on this front and developed a clear timeline outlining the water risk assessment project plan for each quarter in 2022 and what it was hoping to achieve. In April 2022, it made this timeline public on page 50 of its sustainability report related to this. We are continuing the engagement with Chipotle to discuss the results of its water risk assessment and how it is using the results to inform water target setting and robust engagements with its suppliers.

(D) Sustainability Outcome #3:

(D) Sustainability Outcome #3:	Reverse the trend of biodiversity loss
(1) Describe your approach	In our direct equity and credit investment portfolios, we aim to reach zero net deforestation by 2030 (as one of multiple drivers related to achieving no biodiversity loss).
(2) Stewardship tools or activities used	(1) Engagement (2) (Proxy) voting at shareholder meetings
(3) Example	<p>Cardano started a collaboration with geodata analytics firm Satelligence. By combining satellite images and Artificial Intelligence (AI), Satelligence provides Cardano with up-to-date information on deforestation incidents triggered by palm oil production. The cooperation enables Cardano to incorporate this data into its engagement dialogues.</p> <p>Deforestation contributes to approximately 10% of all human-induced greenhouse gas emissions through the release of carbon as forests are cleared or burnt, thus playing a major role in the contribution to climate change, as well as biodiversity loss. The goal of our initiative is to help Cardano achieve its zero deforestation goal through intensive dialogue with investee companies and other stakeholder groups, including relevant expert NGO organisations.</p>

The data and analytics provided by Satelligence allows Cardano to detect and quantify changes in vegetation cover, caused by plantation expansion or fires in forests, swamps and other natural areas linked to palm oil commodity production.

To achieve outcomes, we focus on engaging the entire commodity value chain from retailers to consumer brand companies, to traders and agricultural producers and encourage ambitious steps to be taken to mitigate these incidents from recurring to achieve on the ground improvements. While challenges remain with palm oil transparency and the deforestation linked to plantations, this supply chain has seen more transparency improvements than for example, beef or soy; therefore we have expanded our conversations to include risks associated from other commodities to increase the impact of our engagements.

(E) Sustainability Outcome #4:

(E) Sustainability Outcome #4: Increase circularity

(1) Describe your approach

(2) Stewardship tools or activities used

(3) Example

(F) Sustainability Outcome #5:

(F) Sustainability Outcome #5: Global Compact Compliance

(1) Describe your approach

(2) Stewardship tools or activities used

(3) Example

(G) Sustainability Outcome #6:

(G) Sustainability Outcome #6: Promote improvements in social capital

(1) Describe your approach

(2) Stewardship tools or activities used

(3) Example

(H) Sustainability Outcome #7:

(H) Sustainability Outcome #7: Promote improvements in human capital

(1) Describe your approach

Human Capital Management is one of the material sustainability drivers in our sustainability framework. We define it as the activities related to labour and union rights, employee health & safety and labour practices, impacting on educational opportunities and on income and gender inequality. We aim to invest in companies that provide transparency about how they contribute to the living standards of the communities and secure proper well-being of their employees, protect against social injustice and inequality, and follow principles of good human capital management. We use stewardship activities to promote these practices within our investee companies' operations and their full supply chains.

(2) Stewardship tools or activities used

(1) Engagement
(2) (Proxy) voting at shareholder meetings
(3) Filing of shareholder resolutions or proposals

(3) Example

Cardano has been following the practices at Amazon as it has several human capital related controversies which go against our sustainability beliefs. Some of these concerns are described in a letter sent by Human Impact partners at the end of 2021. In order to address these concerns, we have been following engagements led by our provider Sustainalytics. We are also part of an ICCR (Interfaith Center on Corporate Responsibility) group sharing knowledge about Amazon and have over the years supported most of their shareholder resolutions.

Given the continuous controversies at Amazon around human capital management, their severity and persistence and the slow progress of the company, we decided to escalate the engagement in order to see further progress and encourage stronger outcomes. In 2022:

- We supported most of the shareholder resolutions on the agenda, including resolution 9 on health and safety, resolution 13 on freedom of association and resolution 16 on working conditions

- We voted against the re-election of the members of the Leadership Development and Compensation Committee for lack of board oversight on these matters
- We wrote to the company ahead of the meeting explaining our votes
- We made use of the PRI tool to disclose our votes
- At the end of 2022, we co-signed a letter wrote by SHARE to highlight our concerns relating to the company's practices regarding Freedom of Association. The lack of satisfactory response by the company has lead us to co-file a shareholder resolution for the upcoming 2023 AGM and we will continue the discussion on the topic with Amazon in the weeks leading to their AGM.

Progress with Amazon tends to be slow, despite the use of multiple tools and escalation techniques. The company often refers back to their existing policies and disclosures and it can be difficult to get new commitments. These setbacks are disappointing but encourages us to keep applying strong active ownership in our relationship with the company. Amazon will continue to be a focus company in 2023. As well as keeping this engagement on human capital management active and one on plastic packaging which is still ongoing, we have joined a new coalition engaging tech companies on their human rights impacts.

Through these activities we continue to encourage improvements to see results.

(I) Sustainability Outcome #8:

(I) Sustainability Outcome #8: Promote good governance

(1) Describe your approach

(2) Stewardship tools or activities used

(3) Example

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 9	PLUS	SO 5	N/A	PUBLIC	Stewardship with investees	2

How does your organisation prioritise the investees you conduct stewardship with to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

- (A) We prioritise the most strategically important companies in our portfolio.
 (B) We prioritise the companies in our portfolio most significantly connected to sustainability outcomes.

Describe how you do this:

Based on the aim to have our portfolios operate within or on the pathway towards the safe and just zone for humanity, we set portfolio target around the sustainability transitions. Our targets are linked to the priority transitions including committing our portfolios to: net zero greenhouse gas emissions by 2050, zero net deforestation by 2030, water neutrality by 2030, moving towards an economy with zero waste by 2050 and social and governance targets that relate to companies' contribution to the living standards of the communities affected by their operations, securing proper well-being of their employees, protecting against social injustice and inequality, and following principles of good corporate behaviour, good human capital management and good social capital management.

We determine each of the sectors that are most relevant for achieving these goals based on their exposure to related risks and opportunities and their negative and positive impacts throughout their value chains. For example, for our climate strategy we have defined the top 10 sectors which are the heaviest emitters (including scope 3) or linked to climate change impacts.

We align our stewardship activities with the our company holdings within these sectors to create long term investment value, address systemic risks and achieve sustainability outcomes.

Select from the list:

- 1**
 2
 3
 4
- (C) We prioritise the companies in our portfolio to ensure that we cover a certain proportion of the sustainability outcomes we are taking action on.
 (D) Other

STEWARDSHIP WITH EXTERNAL INVESTMENT MANAGERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 10	PLUS	OO 5, SO 5	N/A	PUBLIC	Stewardship with external investment managers	2

During the reporting year, how did your organisation, or the external service providers acting on your behalf, engage with external investment managers to ensure that they take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

(A) Across all sustainability outcomes

(1) Describe your approach

For our high focus (covered earlier) external managers, we include questions on sustainability outcomes in our annual ESG questionnaire. We also engage with external managers on a regular basis on specific sustainability issues, including climate change and human rights. This year, our letter to managers set out our thinking on double materiality, see https://www.cardano.co.uk/wp-content/uploads/sites/3/2023/03/2303_Letter_Cardanos-Latest-Thinking-on-Sustainable-Investing-2023.pdf.

(B) Sustainability Outcome #1:

(B) Sustainability Outcome #1:

Net zero greenhouse gas emissions

(1) Describe your approach

(C) Sustainability Outcome #2:

(C) Sustainability Outcome #2:

Water neutrality

(1) Describe your approach

(D) Sustainability Outcome #3:

(D) Sustainability Outcome #3:

Reverse the trend of biodiversity loss

(1) Describe your approach

(E) Sustainability Outcome #4:

(E) Sustainability Outcome #4: Increase circularity

(1) Describe your approach

(F) Sustainability Outcome #5:

(F) Sustainability Outcome #5: Global Compact Compliance

(1) Describe your approach

(G) Sustainability Outcome #6:

(G) Sustainability Outcome #6: Promote improvements in social capital

(1) Describe your approach

(H) Sustainability Outcome #7:

(H) Sustainability Outcome #7: Promote improvements in human capital

(1) Describe your approach

(I) Sustainability Outcome #8:

(I) Sustainability Outcome #8: Promote good governance

(1) Describe your approach

STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 11	PLUS	SO 5	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, how did your organisation use engagement with policy makers to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

(A) Across all sustainability outcomes

(1) Describe your approach

We see policy engagement as a natural extension of our sustainability commitments (including net zero, zero net deforestation, water neutrality etc.). We recognise the need to improve the sustainability of the market as-a-whole and that there are clear benefits to us and our clients through well-designed and implemented sustainable investment policy reform. In particular, we will respond to policy consultations relevant to sustainable investment in the UK, Netherlands and Europe, and we will offer our expertise and experience where it is appropriate to do so.

(2) Engagement tools or activities used

(1) We participated in 'sign-on' letters
 (2) We responded to policy consultations
 (3) We provided technical input via government- or regulator-backed working groups

(3) Example(s) of policies engaged on

We have responded to a number of public policy consultations (linked here: <https://www.cardano.co.uk/public-policy-consultations/>) in the UK, EU and US, covering a range of sustainability topics including social risks and opportunities, climate change and stewardship.

Some highlights include.

Dutch Fund and Asset Management Association (DUFAS): In 2022, we participated in the DUFAS SFDR Expert Group which involved stakeholders from Dutch investment management firms to provide input on evolving SFDR disclosure-related requirements. We provided our perspective on SFDR template consultations, EU Taxonomy requirements and, as well as fund classifications and definitions.

Open letter to the EU Commissioner on the Deforestation Regulation: To achieve our goal of net zero deforestation by 2030 across our portfolios and to increase impact, we look for ways in which to engage on the topic through multiple channels. Beyond the collaborative engagement programme that we initiated we also engaged at the policy level since broader regulation sets the “rules of the game” and encourages the market to move in the right direction.

In November 2022, we co-signed an open letter to the EU Commissioner about the inclusion of the financial sector in the Deforestation Regulation.

We felt it was of high importance that the EU Regulation on deforestation-free products includes due diligence obligations for financial institutions. By doing so, it ensures that the EU’s efforts to stop deforestation worldwide are not weakened by enabling the financial industry to finance the same companies that would already be included in the Deforestation Regulation’s scope.

Taskforce for Nature-related Financial Disclosures (TNFD)

In April 2022, following the V0.1 beta release of the TNFD framework, we wrote to the co-chairs to provide feedback and support for further iterations of the framework.

(B) Sustainability Outcome #1:

(B) Sustainability Outcome #1: Net zero greenhouse gas emissions

(1) Describe your approach

(2) Engagement tools or activities used

(3) Example(s) of policies engaged on

(C) Sustainability Outcome #2:

(C) Sustainability Outcome #2: Water neutrality

(1) Describe your approach

(2) Engagement tools or activities used

(3) Example(s) of policies engaged on

(D) Sustainability Outcome #3:

(D) Sustainability Outcome #3: Reverse the trend of biodiversity loss

(1) Describe your approach

(2) Engagement tools or activities used

(3) Example(s) of policies engaged on

(E) Sustainability Outcome #4:

(E) Sustainability Outcome #4: Increase circularity

(1) Describe your approach

(2) Engagement tools or activities used

(3) Example(s) of policies engaged on

(F) Sustainability Outcome #5:

(F) Sustainability Outcome #5: Global Compact Compliance

(1) Describe your approach

(2) Engagement tools or activities used

(3) Example(s) of policies engaged on

(G) Sustainability Outcome #6:

(G) Sustainability Outcome #6: Promote improvements in social capital

(1) Describe your approach

(2) Engagement tools or activities used

(3) Example(s) of policies engaged on

(H) Sustainability Outcome #7:

(H) Sustainability Outcome #7: Promote improvements in human capital

(1) Describe your approach

(2) Engagement tools or activities used

(3) Example(s) of policies engaged on

(I) Sustainability Outcome #8:

(I) Sustainability Outcome #8: Promote good governance

(1) Describe your approach

(2) Engagement tools or activities used

(3) Example(s) of policies engaged on

STEWARDSHIP: ENGAGEMENT WITH OTHER KEY STAKEHOLDERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 12	PLUS	SO 5	N/A	PUBLIC	Stewardship: Engagement with other key stakeholders	2, 5

Does your organisation engage with other key stakeholders to support the development of financial products, services, research, and/or data aligned with global sustainability goals and thresholds?

(A) Across all sustainability outcomes

(1) Key stakeholders engaged

(1) Standard setters
(2) Reporting bodies

(2) Provide further detail on your engagement

For further details, see here: <https://www.cardano.co.uk/public-policy-consultations/>, including TNFD, ISSB and the Transition Plan Taskforce.

(B) Sustainability Outcome #1:

(B) Sustainability Outcome #1:

Net zero greenhouse gas emissions

(1) Key stakeholders engaged

(2) Provide further detail on your engagement

(C) Sustainability Outcome #2:

(C) Sustainability Outcome #2:

Water neutrality

(1) Key stakeholders engaged

(2) Provide further detail on your engagement

(D) Sustainability Outcome #3:

(D) Sustainability Outcome #3: Reverse the trend of biodiversity loss

(1) Key stakeholders engaged

(2) Provide further detail on your engagement

(E) Sustainability Outcome #4:

(E) Sustainability Outcome #4: Increase circularity

(1) Key stakeholders engaged

(2) Provide further detail on your engagement

(F) Sustainability Outcome #5:

(F) Sustainability Outcome #5: Global Compact Compliance

(1) Key stakeholders engaged

(2) Provide further detail on your engagement

(G) Sustainability Outcome #6:

(G) Sustainability Outcome #6: Promote improvements in social capital

(1) Key stakeholders engaged

(2) Provide further detail on your engagement

(H) Sustainability Outcome #7:

(H) Sustainability Outcome #7: Promote improvements in human capital

(1) Key stakeholders engaged

(2) Provide further detail on your engagement

(I) Sustainability Outcome #8:

(I) Sustainability Outcome #8: Promote good governance

(1) Key stakeholders engaged

(2) Provide further detail on your engagement

STEWARDSHIP: COLLABORATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 13	PLUS	SO 5	N/A	PUBLIC	Stewardship: Collaboration	2

During the reporting year, to which collaborative initiatives did your organisation contribute to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

(A) Initiative #1

(1) Name of the initiative • Platform for Living Wage Financials

(2) Indicate how your organisation contributed to this collaborative initiative

(A) We were a lead investor in one or more focus entities (e.g. investee companies)
(B) We acted as a collaborating investor in one or more focus entities (e.g. investee companies)
(C) We publicly endorsed the initiative

(3) Provide further detail on your participation in this collaborative initiative

Cardano is an active member of the Garment workgroup, leading on two company engagement trajectories.

(B) Initiative #2

(1) Name of the initiative

Valuing Water Finance Initiative

(2) Indicate how your organisation contributed to this collaborative initiative

(A) We were a lead investor in one or more focus entities (e.g. investee companies)
(B) We acted as a collaborating investor in one or more focus entities (e.g. investee companies)
(C) We publicly endorsed the initiative
(G) We were part of an advisory committee or similar

(3) Provide further detail on your participation in this collaborative initiative

We are a contributing member of the Task Force and co-lead engager with two companies in the food / restaurant sector and active in an engagement with one company in the beverage sector.

(C) Initiative #3

(1) Name of the initiative

ShareAction – Good Work Coalition and Healthy Markets Initiative

(2) Indicate how your organisation contributed to this collaborative initiative

(B) We acted as a collaborating investor in one or more focus entities (e.g. investee companies)

(3) Provide further detail on your participation in this collaborative initiative

Cardano actively participates in Good Work Coalition and Healthy Markets Initiative. We have been involved in engagement dialogues, co-filing resolutions and investor letters and have achieved notable progress with our engagements.

(D) Initiative #4

(1) Name of the initiative

Satellite-based engagement towards zero deforestation

(2) Indicate how your organisation contributed to this collaborative initiative

(A) We were a lead investor in one or more focus entities (e.g. investee companies)
(B) We acted as a collaborating investor in one or more focus entities (e.g. investee companies)
(C) We publicly endorsed the initiative
(H) We contributed to the development of the initiative's materials and/or resources (e.g. co-authored a report)

(3) Provide further detail on your participation in this collaborative initiative

We launched this innovative, award-winning collaborative engagement programme which focuses on ending deforestation in companies' commodity supply chains.

CONFIDENCE-BUILDING MEASURES (CBM)

CONFIDENCE-BUILDING MEASURES

APPROACH TO CONFIDENCE-BUILDING MEASURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 1	CORE	N/A	Multiple indicators	PUBLIC	Approach to confidence-building measures	6

How did your organisation verify the information submitted in your PRI report this reporting year?

- (A) We conducted independent third-party assurance of selected processes and/or data related to the responsible investment processes reported in our PRI report, which resulted in a formal assurance conclusion
- (B) We conducted a third-party readiness review and are making changes to our internal controls or governance processes to be able to conduct independent third-party assurance next year
- (C) We conducted an internal audit of selected processes and/or data related to the responsible investment processes reported in our PRI report
- (D) Our board, trustees (or equivalent), senior executive-level staff (or equivalent), and/or investment committee (or equivalent) signed off on our PRI report
- (E) We conducted an external ESG audit of our holdings to verify that our funds comply with our responsible investment policy
- (F) We conducted an external ESG audit of our holdings as part of risk management, engagement identification or investment decision-making
- (G) Our responses in selected sections and/or the entirety of our PRI report were internally reviewed before submission to the PRI
 - (H) We did not verify the information submitted in our PRI report this reporting year

INTERNAL REVIEW

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 6	CORE	CBM 1	N/A	PUBLIC	Internal review	6

Who in your organisation reviewed the responses submitted in your PRI report this year?

- (A) Board, trustees, or equivalent
 - Sections of PRI report reviewed
 - (1) the entire report
 - (2) selected sections of the report
- (B) Senior executive-level staff, investment committee, head of department, or equivalent
 - Sections of PRI report reviewed
 - (1) the entire report
 - (2) selected sections of the report

- (C) None of the above internal roles reviewed selected sections or the entirety of the responses submitted in our PRI report this year