



## **PUBLIC TRANSPARENCY REPORT**

**2024**

**abrtn Investments**

Generated 25-11-2024

# 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 public Transparency Reports, which are produced using signatories' reported information, provide accountability and support signatories to have internal discussions about their practices and to discuss these with their clients, beneficiaries, and other stakeholders.

This public Transparency Report is an export of the signatory's responses to the PRI Reporting Framework during the 2024 reporting period. It includes the signatory's responses to core indicators, as well as responses to plus indicators that the signatory has agreed to make public.

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

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

## Disclaimers

### Legal Context

PRI recognises that the laws and regulations to which signatories are subject differ by jurisdiction. We do not seek or require any signatory to take an action that is not in compliance with applicable laws. All signatory responses should therefore be understood to be subject to and informed by the legal and regulatory context in which the signatory operates.

### 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 2024 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.

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# 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?

abrdn has a long history of responsible investing. Environmental, social and governance (ESG) considerations have been an integral part of our decision making for over 30 years. With ESG factors embedded into the investment process, we believe that we can generate better outcomes for our clients, society and the wider world. In addition, we manage over GBP 50 billion across our range of dedicated sustainable funds.

What does responsible investment mean to us?

1. We find risks - we believe ESG factors can be financially material and can meaningfully impact the performance of the assets in which we invest, therefore we seek to address these material financial risks in an effort to protect our clients' assets.
2. We find opportunities – our research-led approach draws from global investment expertise and local market knowledge. This helps us to identify sustainability opportunities and allow us to make better-informed investment decisions for our clients.
3. We seek direct impact - we engage with companies and assets to gain insight and encourage action which we believe creates and protects long-term value.

We work closely with regulators, governments and industry to advance policy that we believe supports both our clients' interests and a sustainable world.

Building on these core beliefs, the four principles below outline our approach to responsible investment:

1. Embed ESG factors - As active investors we aim to integrate environmental, social and governance (ESG) considerations into every stage of research, investment rating and selection, and portfolio construction.
2. Focus on client outcomes - We aim to make clear to all our clients how we are using our focus on sustainability to manage risk, optimise opportunity and act in their long-term interests.
3. Be active stewards - We actively engage with companies and assets in which we invest to get better insight and encourage action that we believe will create and protect long-term value, including in relation to ESG practice. We also vote at AGMs to drive change.
4. Leverage our influence - We look to work closely with governments, regulators and industry bodies globally to advance policy, including those relating to social and environmental standards. We follow these principles across all the asset classes in which we invest. This creates consistency so we can define and seek to achieve client objectives.

Since 2021, we have made a number of commitments across a wide range of topics, and in particular:

- In March 2021, we joined the Net Zero Asset Managers (NZAM) initiative, demonstrating our commitment to working collaboratively with clients to achieve net zero by 2050 or sooner. We published our Net Zero Directed Investing strategy in November 2021, with an interim target to reduce the carbon intensity of the in-scope assets we invest in by 50% by 2030 versus a 2019 baseline.
- In 2023, and following the publication of our approach to Preserving Natural Capital in November 2022, we progressed a review of existing nature-related data and solution providers and communicated on how we are preparing ourselves for the implementation of the recommendations of the Taskforce on Nature-related Financial Disclosures (TNFD). We also joined Nature Action 100, a global investor engagement initiative focused on driving greater corporate ambition and action to reverse nature and biodiversity loss. Natural Capital was a key research area in 2023; we participated in TNFD pilot projects, as well as a Nature based Solution project in collaboration with the Natural History Museum and Ernst and Young.
- In December 2023, we published our 'Thermal coal – our approach for investments'; providing transparency of how we consider coal-related risks and the ability to transition to alternatives in our investment decisions.
- We published 'Diversity, equity and inclusion (DEI): approach for investments' to set out key DEI-related factors we consider in our investment process. We believe that companies that make progress in diversity and inclusion are better positioned for long-term sustainability and outperformance. We have also signed up to the CFA Diversity, Equity and Inclusion (DEI) Code for the US and Canada in 2023. DEI Code signatories will submit confidential, annual progress reports using the CFA DEI Code Reporting Framework.
- Recognizing the importance of social considerations for the successful transition to a low-carbon economy, we published an investor framework for investing in a just transition.

## 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 2023, a number of developments have been made to ESG policies:

- We published our 2023 voting priorities prior to the voting season and updated Listed Company ESG Principles & Voting Policies to clearly communicate our expectations on our investee companies. In October 2023, we published how we actioned against these priorities.
- Following the identification of our highest-financed emitters in our equity and fixed income holdings (2022), we developed a framework and climate-related engagement strategy; documenting our escalation framework on engagements in our stand-alone Engagement policy which was published in December 2023.
- We published our 'approach to sustainability risk integration' for funds in scope of the EU Sustainable Finance Disclosure Regulation. In 2024, we updated this document to include abrdn's approach on anti-greenwashing.
- We published our 'Thermal coal – our approach for investments'; providing transparency of how we consider coal-related risks and the ability to transition to alternatives in our investment decisions.

We achieved strong progress against our 2030 carbon intensity target for our in-scope assets, with an approximately 41% reduction between December 2019 and December 2023. And good progress in decarbonising our real estate portfolios: approximately 25% reduction between December 2019 and December 2022.

On collaborative engagements, Electric Utilities face a unique challenge in supporting energy security requirements whilst phasing out high carbon assets. Through collaboration with other investors via Climate Action 100+ we have engaged with RWE, a German electric utilities company, to discuss options available for legacy coal assets and to voice support for its decarbonisation strategy. We are also involved in Nature Action 100, a global investor engagement initiative focused on driving greater corporate ambition and action on tackling nature loss and biodiversity decline. We are engaging with companies in key sectors that are deemed to be systemically important in reversing nature and biodiversity loss by 2030. Through Advance, a PRI platform for collective engagement on human rights, we are supporting lead for the engagement with Engie.

In line with our commitment to building capacity on sustainable finance in APAC, we updated our 'Sustainable Investing in Practice - An Introduction' e-learning module developed in collaboration with the Investment Management Association of Singapore (IMAS). Following accreditations by the Securities Industry Development Corporation (SIDC) in Malaysia and the Institute of Banking and Finance (IBF) in Singapore, participants in both countries can claim continuous professional development credits after successfully completing the course. In Singapore, this can count as 'Core CPD' for appointed representatives. We have made the module freely available to key clients across Asia-Pacific, as well as to university students in Singapore. We also continue to offer customised training sessions on sustainable investing to our clients.

On awards, we received the 'Leading the journey to Net Zero Award' for our Credibility Assessment Framework at the 2023 Scottish Financial Services Awards. Our US Sustainable Leaders Fund was shortlisted for Responsible Investor's 2023 gender equity investment awards in the US, Climate Transition Bond Fund won the 'Global ESG fixed income fund of the year' award by Environmental Finance. Our engagement work with the mining sector on employee wellbeing was shortlisted for 'Best Sustainable Investment Engagement Initiative' of the 2024 Sustainability Awards.

### Section 3. Next steps

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

Over the next two years, we will keep tracking and aim to continue reducing the carbon intensity of our portfolios to achieve our 2030 target, continue to incorporate carbon footprinting and climate scenario analysis into our investment process and proactively develop net-zero-directed investment solutions to align climate ambition with investment opportunity, to help our clients achieve their climate goals. We will continue to enhance our climate scenario analysis, notably by looking in detail at physical and transition risks for our real assets. We are aiming to incorporate our credibility assessment framework into the investment process, company engagement and products / solutions.

On the natural capital front, we will continue our research efforts, notably to improve the integration of these aspects into our investment decisions while preparing for disclosures against the recommendations of the Taskforce for Nature-related Financial Disclosures (TNFD).

We will continue to implement our active ownership approach, notably through ongoing engagement with our top 20 highest financed emitters and dedicated diversity and inclusion voting strategies. We will continue to update our Listed Company ESG Principles & Voting Policies at least annually and keep monitoring and considering the demands for 'client expression of wish' and 'client-directed voting'.

We will keep striving to meet our clients' demands by evolving our product range, from investment solutions which support net-zero targets to thematic solutions, for example those that aim to protect natural capital. Similarly, we will regularly review our client reporting with the objective of increasing the quality and depth of the information we provide on our funds and mandates, such as providing more detailed insights into our voting and engagement activities. More broadly, we will work to support abrdn's and our clients' ability to align with and report against relevant reporting and disclosure frameworks, particularly in a context of increasing regulatory expectations.

To support these objectives, we will continue to enhance our ESG data infrastructure, to ensure that we obtain the right data and that it is easily accessible by the relevant teams across our Investments business.

An important area of focus for us is also to ensure that we continuously meet applicable regulations, across all the geographies where we operate. In particular, we are committed to adopting a conservative approach to ensure that we stay ahead of potentially higher regulatory and client expectations.

Given the Board's and Directors' role in overseeing how sustainability is integrated in our strategy, risk management and company culture, we will consider implementing a sustainability learning programme for our Directors. This programme will supplement existing knowledge and updates from management, and will deliver an independent view on sustainability trends, regulatory environment, and notable risks and opportunities.

Building our internal 'Grow Sustainably Academy' training programme, we will continue to ensure that staff across Investments have the

#### 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

Peter Branner; Dan Grandage

Position

CIO Investment; Chief Sustainability Officer

Organisation's Name

abrdn

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'.**

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# 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	2023

## 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\$ 467,479,000,000.00

(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\$ 0.00

## ASSET BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5	CORE	OO 3	Multiple indicators	PUBLIC	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	>10-50%	0%
(B) Fixed income	>10-50%	>0-10%
(C) Private equity	0%	0%
(D) Real estate	>0-10%	>0-10%
(E) Infrastructure	>0-10%	0%
(F) Hedge funds	>0-10%	>0-10%
(G) Forestry	0%	0%
(H) Farmland	0%	0%
(I) Other	>0-10%	0%
(J) Off-balance sheet	>0-10%	0%

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

Multi-asset (which includes multi-managers and derivatives)

**(J) Off-balance sheet - (1) Percentage of Internally managed AUM - Specify:**

Cash

## ASSET BREAKDOWN: EXTERNALLY MANAGED ASSETS

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

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

	(2) Fixed income - SSA	(3) Fixed income - corporate	(4) Fixed income - securitised	(5) Fixed income - private debt
(A) Active	0%	0%	0%	>75%
(B) Passive	0%	0%		

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	PUBLIC	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)
(C) Fixed income - active	>75%	0%
(F) Real estate	>10-50%	>50-75%
(H) Hedge funds	>75%	>0-10%

## 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	PUBLIC	Asset breakdown: Internally managed listed equity	GENERAL

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

(A) Passive equity >10-50%

(B) Active – quantitative >0-10%

(C) Active – fundamental >50-75%

(D) Other strategies >0-10%

**(D) Other strategies - Specify:**

REITs

## 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	PUBLIC	Asset breakdown: Internally managed fixed income	GENERAL

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

(A) Passive – SSA >0-10%

(B) Passive – corporate >0-10%

(C) Active – SSA >10-50%

(D) Active – corporate >50-75%

(E) Securitised 0%

(F) Private debt >0-10%

## ASSET BREAKDOWN: INTERNALLY MANAGED REAL ESTATE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 RE	CORE	OO 5	N/A	PUBLIC	Asset breakdown: Internally managed real estate	GENERAL

**Provide a further breakdown of your internally managed real estate AUM.**

(A) Retail	0%
(B) Office	0%
(C) Industrial	>0-10%
(D) Residential	>10-50%
(E) Hotel	0%
(F) Lodging, leisure and recreation	0%
(G) Education	0%
(H) Technology or science	0%
(I) Healthcare	0%
(J) Mixed use	>50-75%
(K) Other	>0-10%

**(K) Other - Specify:**

Multi-manager

## ASSET BREAKDOWN: INTERNALLY MANAGED INFRASTRUCTURE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 INF	CORE	OO 5	N/A	PUBLIC	Asset breakdown: Internally managed infrastructure	GENERAL

**Provide a further breakdown of your internally managed infrastructure AUM.**

(A) Data infrastructure >0-10%

(B) Diversified >50-75%

(C) Energy and water resources >0-10%

(D) Environmental services 0%

(E) Network utilities >0-10%

(F) Power generation (excl. renewables) 0%

(G) Renewable power >0-10%

(H) Social infrastructure >0-10%

(I) Transport >10-50%

(J) Other 0%

## ASSET BREAKDOWN: INTERNALLY MANAGED HEDGE FUND

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 HF	CORE	OO 5	OO 11	PUBLIC	Asset breakdown: Internally managed hedge fund	GENERAL

**Provide a further breakdown of your internally managed hedge fund assets.**

(A) Multi-strategy 0%

(B) Long/short equity 0%

(C) Long/short credit 0%

(D) Distressed, special situations  
and event-driven fundamental 0%

(E) Structured credit 0%

(F) Global macro 0%

(G) Commodity trading advisor 0%

(H) Other strategies >75%

**(H) Other strategies - Specify:**

ETFs

## MANAGEMENT BY PRI SIGNATORIES

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

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

>10-50%

## 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	(5) >30 to 40%
(B) Fixed income – SSA	(4) >20 to 30%
(C) Fixed income – corporate	(2) >0 to 10%
(E) Fixed income – private debt	(1) 0%
(G) Real estate	(2) >0 to 10%
(H) Infrastructure	(1) 0%
(I) Hedge funds	(1) 0%

# 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
(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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(D) We do not conduct stewardship	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

  

	(6) Real estate	(7) Infrastructure	(8) Hedge funds	(11) Other
(A) Yes, through internal staff	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(B) Yes, through service providers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(C) Yes, through external managers	<input checked="" type="checkbox"/>	<input 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 checked="" 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 type="checkbox"/>	<input 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	(11) >90 to <100%
(B) Listed equity - passive	(11) >90 to <100%

## STEWARDSHIP NOT CONDUCTED

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 10	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship not conducted	2

**Describe why your organisation does not currently conduct stewardship and/or (proxy) voting.**

Stewardship, excluding (proxy) voting  
(K) Other

Most of the holdings in this category are derivatives

## 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, to some extent, 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"/>
(B) Listed equity - active - quantitative	<input checked="" type="radio"/>	<input type="radio"/>
(C) Listed equity - active - fundamental	<input checked="" type="radio"/>	<input type="radio"/>
(D) Listed equity - other strategies	<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"/>

(J) Real estate	<input checked="" type="radio"/>	<input type="radio"/>
(K) Infrastructure	<input checked="" type="radio"/>	<input type="radio"/>
(S) Hedge funds - Other strategies	<input checked="" type="radio"/>	<input type="radio"/>
(V) Other: Multi-asset (which includes multi-managers and derivatives)	<input type="radio"/>	<input checked="" 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, to some extent, 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
(C) Fixed income - active	<input checked="" type="radio"/>	<input type="radio"/>
(F) Real estate	<input checked="" type="radio"/>	<input type="radio"/>
(H) Hedge 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, to some extent, 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
(C) Fixed income - active	<input checked="" type="radio"/>	<input type="radio"/>
(F) Real estate	<input checked="" type="radio"/>	<input type="radio"/>
(H) Hedge 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, to some extent, 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
(C) Fixed income - active	<input checked="" type="radio"/>	<input type="radio"/>
(F) Real estate	<input checked="" type="radio"/>	<input type="radio"/>
(H) Hedge funds	<input checked="" type="radio"/>	<input type="radio"/>

## ESG NOT INCORPORATED

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 16	CORE	OO 11, OO 12–14	N/A	PUBLIC	ESG not incorporated	1

Describe why your organisation does not currently incorporate ESG factors into your investment decisions and/or in the selection, appointment and/or monitoring of external investment managers.

Internally managed  
(O) Other

Most of the holdings in this category are derivatives.

## 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	PUBLIC	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	>10-50%
(D) Screening and integration	>10-50%
(E) Thematic and integration	0%
(F) Screening and thematic	0%
(G) All three approaches combined	0%
(H) None	>10-50%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17.1 LE	CORE	OO 17 LE	LE 9	PUBLIC	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	>50-75%
(C) A combination of screening approaches	>10-50%

## 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	PUBLIC	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	>75%	0%
(C) Integration alone	>10-50%	>50-75%
(D) Screening and integration	0%	>10-50%
(E) Thematic and integration	0%	0%
(F) Screening and thematic	0%	0%

(G) All three approaches combined 0% >0-10%

(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	PUBLIC	Fixed income	1

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

**(2) Fixed income - corporate**

(A) Positive/best-in-class screening only 0%

(B) Negative screening only >50-75%

(C) A combination of screening approaches >10-50%

## 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	PUBLIC	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:

>10-50%

- (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

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18.1	CORE	OO 18	OO 18.2	PUBLIC	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:

>0-10%

(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
- (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	PUBLIC	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 >10-50%

(B) Fixed income - passive >50-75%

## THEMATIC BONDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 20	CORE	OO 17 FI	FI 15, FI 17	PUBLIC	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 >50-75%

(B) Social bonds >0-10%

(C) Sustainability bonds >10-50%

(D) Sustainability-linked bonds >0-10%

(E) SDG or SDG-linked bonds 0%

(F) Other >0-10%

(G) Bonds not labelled by the issuer 0%

## (F) Other - Specify:

The majority of our labelled bonds follow industry standards, however small % do not. For all our labelled bond investments regardless of having industry standards are assessed through our own labelled bond framework to determine investability.

## 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"/>
(B) Listed equity – active – quantitative	<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"/>
(D) Listed equity – other strategies	<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"/>
(J) Real estate	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

(K) Infrastructure	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(S) Hedge funds – Other strategies	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(V) External manager selection, appointment and monitoring (SAM) – fixed income - active	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(Y) External manager selection, appointment and monitoring (SAM) – real estate	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(AA) External manager selection, appointment and monitoring (SAM) – hedge funds	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

## OTHER ASSET BREAKDOWNS

### REAL ESTATE: BUILDING TYPE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 24	CORE	OO 21	RE 1, RE 9 - 10	PUBLIC	Real estate: Building type	GENERAL

What is the building type of your physical real estate assets?

- (A) Standing investments
- (B) New construction
- (C) Major renovation

### REAL ESTATE: OWNERSHIP LEVEL

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 25	CORE	OO 21	N/A	PUBLIC	Real estate: Ownership level	GENERAL

What is the percentage breakdown of your physical real estate assets by the level of ownership?

- (A) A majority stake (more than 50%)
  - Select from the list:
    - (1) >0 to 10%
    - (2) >10 to 50%
    - (3) >50 to 75%
    - (4) >75%
- (B) A significant minority stake (between 10–50%)
- (C) A limited minority stake (less than 10%)

## REAL ESTATE: MANAGEMENT TYPE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 26	CORE	OO 21	RE 1, RE 6–8, RE 13	PUBLIC	Real estate: Management type	GENERAL

Who manages your physical real estate assets?

- (A) Direct management by our organisation
- (B) Third-party property managers that our organisation appoints
- (C) Other investors or their third-party property managers
- (D) Tenant(s) with operational control

## INFRASTRUCTURE: OWNERSHIP LEVEL

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 27	CORE	OO 21	N/A	PUBLIC	Infrastructure: Ownership level	GENERAL

What is the percentage breakdown of your organisation's infrastructure assets by the level of ownership?

- (A) A majority stake (more than 50%)  
Select from the list:
  - (1) >0 to 10%
  - (2) >10 to 50%
  - (3) >50 to 75%
  - (4) >75%
- (B) A significant minority stake (between 10–50%)  
Select from the list:
  - (1) >0 to 10%
  - (2) >10 to 50%
- (C) A limited minority stake (less than 10%)  
Select from the list:
  - (1) >0 to 10%
  - (2) >10 to 50%

## INFRASTRUCTURE: STRATEGY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 28	CORE	OO 21	N/A	PUBLIC	Infrastructure: Strategy	GENERAL

What is the investment strategy for your infrastructure assets?

- (A) Core
- (B) Value added

- (C) Opportunistic
- (D) Other

## INFRASTRUCTURE: TYPE OF ASSET

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 29	CORE	OO 21	INF 1	PUBLIC	Infrastructure: Type of asset	GENERAL

What is the asset type of your infrastructure?

- (A) Greenfield
- (B) Brownfield

## INFRASTRUCTURE: MANAGEMENT TYPE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 30	CORE	OO 21	Multiple, see guidance	PUBLIC	Infrastructure: Management type	GENERAL

Who manages your infrastructure assets?

- (A) Direct management by our organisation
- (B) Third-party infrastructure operators that our organisation appoints
- (C) Other investors, infrastructure companies or their third-party operators
- (D) Public or government entities or their third-party operators

## 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:

We have published a biodiversity position statement (<https://www.abrdn.com/docs?editionId=9a6f8d37-e3cb-456d-891f-c54588b34332>) and research note on our approach to natural capital Natural capital: <https://www.abrdn.com/en-us/institutional/insights-and-research/natural-capital-no-net-zero-without-it>

We have published our Thermal Coal investment approach document: <https://www.abrdn.com/docs?editionId=b836f4f9-cdee-40ea-816a-b0c80108c060>

- (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.abrdn.com/docs?editionId=a99fef23-d2a7-4bf9-a152-b11b00af23fd>

**(B) Guidelines on environmental factors**

Add link:

<https://www.abrdn.com/docs?editionId=58173dc7-39ba-41dc-aa19-3350d15cf6e5>

**(C) Guidelines on social factors**

Add link:

[https://www.abrdn.com/docs?editionId=e540713a-539b-47d7-a77f-8b8182b71aa2#xd\\_co\\_f=ZmQ5NDg2MjltZmM1OC00MDA1LWEwMTctNTVhZWewMTg1ZmRI-](https://www.abrdn.com/docs?editionId=e540713a-539b-47d7-a77f-8b8182b71aa2#xd_co_f=ZmQ5NDg2MjltZmM1OC00MDA1LWEwMTctNTVhZWewMTg1ZmRI-)

**(D) Guidelines on governance factors**

Add link:

<https://www.abrdn.com/docs?editionId=08bef34e-1287-404f-8196-03393c3fb91e>

**(E) Guidelines on sustainability outcomes**

Add link:

[https://www.abrdn.com/en-gb/institutional/insights-and-research/esg-climate-change-net-zero#xd\\_co\\_f=YmFiNTYxMGMtNmVmOS00MmI0LTg5M2MtZmJmNGZIMjU2YzE2-](https://www.abrdn.com/en-gb/institutional/insights-and-research/esg-climate-change-net-zero#xd_co_f=YmFiNTYxMGMtNmVmOS00MmI0LTg5M2MtZmJmNGZIMjU2YzE2-)

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

Add link:

<https://www.abrdn.com/docs?editionId=58173dc7-39ba-41dc-aa19-3350d15cf6e5>

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

Add link:

[https://www.abrdn.com/docs?editionId=e540713a-539b-47d7-a77f-8b8182b71aa2#xd\\_co\\_f=ZmQ5NDg2MjltZmM1OC00MDA1LWEwMTctNTVhZWewMTg1ZmRI-](https://www.abrdn.com/docs?editionId=e540713a-539b-47d7-a77f-8b8182b71aa2#xd_co_f=ZmQ5NDg2MjltZmM1OC00MDA1LWEwMTctNTVhZWewMTg1ZmRI-)

**(H) Specific guidelines on other systematic sustainability issues**

Add link:

<https://www.abrdn.com/docs?editionId=0d8d4b92-66eb-4f7f-a82b-c5812ddde607>

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

Add link:

<https://www.abrdn.com/en-gb/institutional/sustainable-investing>

**(J) Guidelines on exclusions**

Add link:

<https://www.abrdn.com/docs?editionId=fc0dd666-269a-40f4-a484-d044e4daad3d>

**(K) Guidelines on managing conflicts of interest related to responsible investment**

Add link:

<https://www.abrdn.com/docs?editionId=288816fc-dbdb-446c-811a-da51f8846310>

**(L) Stewardship: Guidelines on engagement with investees**

Add link:

<https://www.abrdn.com/docs?editionId=50636955-103f-47cb-86e2-036aec4d30d4>

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

Add link:

<https://www.abrdn.com/docs?editionId=50636955-103f-47cb-86e2-036aec4d30d4>

**(O) Stewardship: Guidelines on (proxy) voting**

Add link:

<https://www.abrdn.com/docs?editionId=08bef34e-1287-404f-8196-03393c3fb91e>

- (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:

This is captured in a number of our approach documents and position statements, in particular, our 'abrdn's approach to sustainability risk integration', annual stewardship report and our voting policies.

Our core beliefs:

There are three reasons why we believe it's important to integrate ESG factors into our investment processes, and these are founded in our fiduciary duties:

- ESG factors are financially important and directly affect the performance of the assets in which we invest. Our research has shown that those investments that take their ESG responsibilities seriously tend to outperform those that don't.
- Understanding ESG risks and opportunities alongside other financial metrics helps us to make better investment decisions.
- Informed and constructive engagement helps corporations improve practices –we believe it could enhance the value of our clients' investments.

We have defined four ESG principles that express our core beliefs. These put stewardship and ESG considerations as the focus within four aspects of our business:

Embed ESG factors

As active investors we aim to integrate environmental, social and governance (ESG) considerations into our research, investment rating and selection, and portfolio construction.

Focus on client outcomes

We aim to make clear to all our clients how we are using our focus on sustainability to manage risk, optimise opportunity and act in their long-term interests.

Be active stewards

We actively engage with companies and assets in which we invest to get better insight and encourage action that we believe will create long-term value, including in relation to ESG practice. We also vote at AGMs to drive change.

Leverage our influence

We look to work closely with governments, regulators and industry bodies globally to advance policy, including that relating to social and environmental standards.

Where possible, we aim follow these principles across all the asset classes in which we invest. This creates consistency so we can define and seek to achieve client objectives.

- o (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
- o (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
- o (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

Add link(s):

<https://www.abrdn.com/docs?editionId=08bef34e-1287-404f-8196-03393c3fb91e>

- (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

(C) Guidelines on social factors

(D) Guidelines on governance factors

(6) >90% to <100%

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	(2) for a majority of our AUM
(B) Specific guidelines on human rights	(2) for a majority of our AUM
(C) Specific guidelines on other systematic sustainability issues	(2) for a majority 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%

(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%

(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%

(F) Hedge funds

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:

Our Chief Sustainability Officer with overall responsibility for ensuring integration of ESG factors and execution of Stewardship activity across the Investments Vector. Significant sustainability policies that affect the entire investment business receive additional approval by the CIO Leadership (includes Heads of Asset Classes, Head of Oversight, Analytics & Execution) chaired by the CIO and the Investment Vector Executive, Chaired by the CEO.

- (C) Investment committee, or equivalent

Specify:

The Sustainability Council is a senior governance body for sustainable investing at abrdn and includes members of the Investments Sustainability Group, as well as senior managers and sustainability specialists who oversee and drive sustainable investing across the company, allowing us to coordinate sustainability matters from a company-wide perspective.

- (D) Head of department, or equivalent

Specify department:

Significant sustainability policies that affect the entire investment business receive additional approval by the CIO Leadership (includes Heads of Asset Classes, Head of Oversight, Analytics & Execution) chaired by the CIO and the Investment Vector Executive, Chaired by the CEO.

- (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 type="checkbox"/>	<input checked="" type="checkbox"/>
(E) Specific guidelines on human rights (may be part of guidelines on social factors)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(F) Specific guidelines on other systematic sustainability issues	<input type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>
(I) Guidelines on managing conflicts of interest related to responsible investment	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(J) Stewardship: Guidelines on engagement with investees	<input 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

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

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
- (B) No

Explain why:

abrdn is a strictly apolitical company. As a global investor we engage regularly with policymakers across the jurisdictions in which we operate on issues relevant to our business, our stakeholders and wider society. This enables us to share knowledge, insights, ideas and views which can help shape policy and contribute to better outcomes. However, this engagement takes place within strong parameters.

We work closely with a wide range of industry bodies who engage with policymakers e.g. the Investment Association (IA), the European Fund and Asset Management Association (EFAMA) and the Principles of Responsible Investment (PRI). These bodies do not have any political affiliations and are strictly non-partisan.

- (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:

CSO: overall responsibility of ESG integration across the investment business  
 CIO Leadership Team: responsible for enforcing at an asset class level  
 CEO: takes responsibility for climate-related risks and opportunities and is incentivised alongside our CFO, through climate-related remuneration targets in variable bonus scorecards, which is aligned to company objectives and set by our Remuneration Committee.  
 The Board: provide oversight for our TCFD report, Stewardship Report

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

Specify:

We use various externally sourced ESG datasets and voting related research from ESG service providers to supplement our proprietary ESG analysis. We will also invest capital in external investment managers in certain asset classes e.g. real estate and hedge funds.

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

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)

Our global remuneration policy is updated annually. On page 115 of our 2023 Annual report and accounts, we include details of our Directors' remuneration report, where we outline the performance conditions for the annual bonus in 2023, which aims to reward the delivery of our company's business plan. Non-financial performance conditions carry a 35% weighting, which includes a 15% weighting against ESG objectives. These incorporate objectives against environmental (via sustainability and decarbonisation metrics) and social factors (via employee engagement and diversity metrics).

Our Executive Directors Remuneration policy is set by our Remuneration Committee and agreed at our Annual General Meeting. The award for variable bonus considers non-financial measures, including performance against our climate change targets, alongside progress on climate focused solutions and client engagement. Climate-related performance makes up 5% of the overall scorecard. The Remuneration Committee received periodic updates from the business and independently review performance. The policy is applicable to both our Chief Executive Officer and Chief Financial Officer. More information is available in our Annual report and accounts.

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

## 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.abrdn.com/docs?editionId=afb53552-b713-47a1-888b-ef5edb35b776>

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.abrdn.com/en-is/investor/funds/sfdr-disclosures>

(B) Disclosures against the European Union's Taxonomy

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

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

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

(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

(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:  
  - Legally required exclusions (e.g. those required by domestic/international law, bans, treaties or embargoes)
- (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**  
 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
- (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	(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"/>				
(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"/>				

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 engagements we undertake with the investments we make are categorised under the following four headings:

- Review – Part of our ongoing due diligence and frequent interactions led by the analyst responsible for oversight of the investment, usually attended by other members of relevant investment teams.
- Respond – Reacting to an event that may impact a single investment or a selection of similar investments.

- Enhance – Designed to seek change that, in our view, would enhance the value of our investment.
- Thematic – Resulting from our focus on a particular ESG theme, such as climate change, diversity and inclusion or modern slavery.

Our regular 'review' meetings are normally held with the executive management responsible for our investments, but we will also engage with board members – generally the chair or other non-executive directors. Such meetings further develop our understanding of how the board is fulfilling its responsibilities and give us the opportunity to communicate views constructively, as and when appropriate.

Our 'respond' and 'enhance' engagements are bespoke interactions with specific outcome intentions and are defined as priority engagements. These also focus on the delivery of long-term value from the investments we make on behalf of clients. The nature of ESG risks are such that they are ever-present but require a long-term outlook to fully assess them. Our engagements will often be with board members, both executive and non-executive, but will also include detailed assessment of specific risk mitigation through engagement with relevant experts within a company, including those relating to sustainability.

For our 'thematic' engagements, we select investments which are felt to be materially impacted by ESG themes identified by the Investments Sustainability Group. These themes may arise in the short term due to particular events, or may be long running in nature and impacting many sectors and investments. Engagements relating to a specific theme are likely to occur over multiple planning periods and will be led by our Investments Sustainability Group experts.

The engagement planning process is led by our investment desks, supported by the Investments Sustainability Group, and is informed by our ongoing diligence and research, reviews of investment sectors, specific fund reviews, our ESG scoring mechanisms and the peer review processes used by investment desks. Of particular importance to us is the benefit of sharing and collaborating across our asset class teams. Our equity, fixed income and real estate teams are often investing in and engaging with the same issuers, but using a different analytical lens, bringing new insights.

When planning company engagement, our approach is to review the total securities held across all funds to form a view on the overall position for our clients. If this is across different asset classes, then the relevant desks are notified accordingly to ensure there is the alignment on the reasons for engaging and that a holistic view on the engagement drivers is captured. Total holdings represent one of many factors that drive our engagement activity, the full list is as follows:

- Size of holding
- Size of holding in relation to company's market cap
- Internal ESG ratings - these include overall ESG House Score rating and ratings from different investment desks, including fixed income and equity
- External ratings, including providers such as MSCI
- Milestones, where we have asked for actions from a company and seek to measure response
- Reactive engagement as a result of breaking issues
- Voting resolutions
- Thematic engagement e.g. a particular focus on a specific ESG topic, such as deforestation
- Mandate driven - engagement in relation to a specific fund mandate or range of mandates
- Specific client requests
- Companies identified as 'winner list' securities that we actively seek to invest in

In addition, we endeavour to vote at all general meetings of our investee companies and this is an important element of our ongoing engagement with management and boards. We regularly engage with companies prior to voting, where further context, clarification or discussion is considered necessary. If we plan to vote against company management we will generally inform the company, to exchange views and explain why we do not think the proposal is in our clients' best interests. This forms an important part of our engagement policy and if company management disregards our views or is not responsive to our suggestions, this adds to our understanding of the company and will be a factor in our considering how to escalate our engagement.

Every year, we update our Listed Company ESG Principles and Voting Policies, which sets out key voting topics and related expectations: <https://www.abrdn.com/docs?editionId=08bef34e-1287-404f-8196-03393c3fb91e>

Some top issues for voting are summarised in this document.

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.**

We are willing to act collectively with other investors in seeking to protect and enhance shareholder value, or to otherwise address issues that are relevant to our clients' best interests. Collaborative engagement may therefore be used as a result of an escalation of our own activities or to drive change relating to a specific theme across a group of investments. These collaborations may involve a bespoke group of selected investors, or one of the many affiliation groups that are created on a regional basis or in relation to a specific theme.

In deciding whether or not to act collectively with other investors, we take into account a range of factors, such as:

- whether or not collective engagement is likely to be more effective than unilateral engagement.

- the degree to which the objectives of the other investors are aligned to our own.
- the need for confidentiality.
- the context of the investee company and, exceptionally, the wider economy.

To help us effectively participate in collective engagement, we maintain good working relationships with other institutional investors. We also support collaborative engagements organised by representative bodies and others, when these are aligned with our clients' interests. We work with a number of organisations in order to participate in collective engagement.

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:  
 3
- (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:  
 5
- (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 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?**

Engagement is a core part of our investment process and part of our initial analysis as well as ongoing investment in a company. Engagement is undertaken by the investment teams, or led by the Active Ownership team in conjunction with the investment teams. This ensures that the insights gained can form part of the investment rationale. Engagement can either be conducted as part of our mainstream meetings with a company, or on a specific ESG topic.

We believe that it is important for our engagement activities to enable us to make better investment decisions. This is done by:

- Understanding how investors' interests can be protected through the management of risks that materially impact business success.
- As active owners of our clients' assets, we seek to collaborate with our investee companies as we navigate the huge shifts we are seeing across global economies.
- Understanding the material risks and opportunities – including those relating to environmental and social factors and helping to shape the future success of the business.

We are currently engaging on Net Zero with the house top 20 net financed emitters (integrated list of Equities and Fixed Income). We have established a framework which enables a consistent approach of engaging across sectors and regions.

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.**

abrdn's stewardship aims and commitments:

Our stewardship strategy is outline in detail in our Stewardship Report - <https://www.abrdn.com/docs?editionId=50636955-103f-47cb-86e2-036aec4d30d4>

To meet the needs of our clients and key stakeholders, and create benefits for the economy, society, and environment, we focus on these core areas:

1. Our investment process: We integrate and appraise ESG factors in our investment process and seek to generate the best long-term outcomes for our clients, consistent with their risk and asset allocation preferences.
2. Our investment activity: We actively take steps as stewards and seek to deliver long-term, sustainable value consistent with our clients' objectives and risk tolerance.
3. Our client journey: We clearly define how we act in our clients' interests in delivering our stewardship and ESG principles and transparently report on our actions to meet those interests.
4. Our corporate influence: We actively support enhancements to policy, regulatory and industry standards to deliver a better future for our clients, the environment and society.
5. Our corporate activity: We gather data to understand and manage the material ESG factors in our own operations to ensure our own impact contributes to positive outcomes for all stakeholders.

## 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
- (C) We ensure consistency with our voting policy by reviewing external service providers' voting recommendations only after voting has been executed
  - (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**

Provide details on these criteria:

Where we lend stock on behalf of clients, and subject to the terms of client agreements, we hold the right to recall shares where it is in clients' interests and we take the view that it will impact the final vote to maintain full voting weight on a particular meeting or resolution.

- (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**

Add link(s) to public disclosure:

<https://www.abrdn.com/en-gb/corporate/news/all-news/abrdn-publishes-2023-voting-priorities>  
<https://www.reuters.com/business/energy/abrdn-vote-against-centricas-remuneration-report-2023-06-01/>

- (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.abrdn.com/en-us/investor/sustainable-investing/voting>

- (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	(1) for all votes	(1) for all 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

○

○

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

○

○

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

<https://www.abrdn.com/en-us/investor/sustainable-investing/voting>

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?**

Our proxy voting administration team runs a monthly vote rejection report which we have set-up via the ISS platform. Following a review of this report we will take action on the relevant funds and markets that we can impact accordingly to hopefully ensure that future votes will be accepted and counted correctly. For example by ensuring that Powers of Attorney are in place.

## STEWARDSHIP: ESCALATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 36	CORE	OO 8, OO 9 HF, 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

(A) Joining or broadening an existing collaborative engagement or creating a new one

(B) Filing, co-filing, and/or submitting a shareholder resolution or proposal

(C) Publicly engaging the entity, e.g. signing an open letter

(D) Voting against the re-election of one or more board directors

(E) Voting against the chair of the board of directors, or equivalent, e.g. lead independent director

(F) Divesting

(G) Litigation

(H) Other

(I) In the past three years, we did not use any of the above escalation measures for our listed equity holdings

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

Use media to announce our voting action to escalate: <https://news.sky.com/story/british-gas-owner-centrica-faces-pay-revolt-from-top-city-firm-12894454>

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

## 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
  - (D) We engaged policy makers on our own initiative
- Describe:

Our External Affairs team supports the implementation of our corporate sustainability strategy through our engagement with policymakers and regulators on relevant areas of policy – including emerging sustainability disclosure standards, green taxonomies and transition pathways. While we engage directly with policymakers on behalf of the company and our stakeholders we also respond to government and regulatory consultations, contribute evidence to parliamentary inquiries and work closely with our trade associations to help shape industry positions.

(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.abrdn.com/docs?editionId=50636955-103f-47cb-86e2-036aec4d30d4>

(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

## 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**

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

As part of our climate change integration into investments, abrdn has developed a bespoke climate scenario analysis, the framework takes the “off-the-shelf” scenarios from the NGFS and complements them with bespoke scenarios which take more granular considerations on a sector and regional basis. These consider our macro, policy and technological views in relation to the energy transition. Taking this approach also enables us to take a probabilistic view of climate change. We have published on this scenario analysis framework extensively and have found both upside financial opportunities and risks across sectors but also within sectors. The analysis considers various drivers such as demand creation, demand destruction, carbon price risk, physical risk, abatement opportunities and adaptation readiness. While this analysis considers a long-term time horizon out to 2050, the methodology utilises a discounted cash flow to produce a net present value impact which is relevant for investors today.

We incorporate a range of tools beyond climate scenario analysis across asset classes where appropriate, this includes: carbon footprinting, portfolio alignment (covering Maturity Scale, Implied Temperature Rise and Benchmark Divergence), a corporate transition plan credibility assessment framework, climate policy index, ESG house score, sector and individual stock-level research. The data we pull in for these tools cover: GHG emissions data, Climate Action 100+ benchmark data, Transition Pathway Initiative data, CDP data, green revenues data, MSCI and Planetrics company targets data. We have worked closely with our private markets team to align the data structure of this data that is more commonly available in public markets.

We have integrated company targets into our climate scenario analysis, along with our corporate transition plan credibility assessment. These initiatives have helped produce granular information for investment desks to better navigate the ever-increasing number of net-zero commitments being set by corporates.

These toolkits complement our additional sector and individual company research which is carried out within investment teams and within the Sustainability Group function, often with overlapping collaboration. Each investment team has weekly interaction with members of the Sustainability Group which informs investment and sustainability views on individual companies and supports research efforts.

Across all of these areas we have identified both climate-related risks and opportunities which help to inform our investment decision making.

In November 2021, we published our Net Zero Directed Investing (NZDI) strategy, with a commitment to reduce the carbon intensity of the assets we invest in by 50% by 2030 versus a 2019 baseline. The assets in scope for the 50% target are Equities, Corporate Credit, Quantitative Investment Strategies (QIS), Real Estate, Discretionary and selected Multi-Asset funds, representing around 30% of our total AUM. We aim to increase this over time as data availability improves and client demand for incorporating carbon targets into mandates increases. We have seen significant interest in demand for product frameworks within our sustainable index range and climate transition bond framework, which seeks to allocate capital to firms taking clear and credible action to decarbonise their operations.

**(B) Yes, beyond our standard planning horizon**

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

The climate scenario analysis framework goes out until 2050, as such it takes a longer-term view than what is typical for most investors.

As part of our climate change integration into investments, abrdn has developed a bespoke climate scenario analysis, the framework takes the “off-the-shelf” scenarios from the NGFS and complements them with bespoke scenarios which take more granular considerations on a sector and regional basis. These consider our macro, policy and technological views in relation to the energy transition. Taking this approach also enables us to take a probabilistic view of climate change. We have published on this scenario analysis framework extensively and have found both upside financial opportunities and risks across sectors but also within sectors. The analysis considers various drivers such as demand creation, demand destruction, carbon price risk, physical risk, abatement opportunities and adaptation readiness. While this analysis considers a long-term time horizon out to 2050, the methodology utilises a discounted cash flow to produce a net present value impact which is relevant for investors today.

**(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:

Please refer to pages 11-35 of our 2023 Sustainability and TCFD Report: <https://www.abrdn.com/docs?editionId=afb53552-b713-47a1-888b-ef5edb35b776>

abrdn has built a number of capabilities across asset classes to integrate climate-related risks and opportunities in investment strategies and products. Within corporate credit we have developed a climate transition bond framework which seeks to allocate capital to companies with credible decarbonisation targets that are demonstrable and have real-world impact, particularly in the higher emitting sectors such as utilities, materials, and industrials.

Within our Quantitative Investment Strategies team, we have developed a range of Sustainable Index products which target carbon efficient companies, providing investors with a low-cost passive solution to climate change integration – we continue to explore more innovative methods of integrating climate-related data to balance investment, sustainability and cost objectives of clients.

The equities SDG and Impact frameworks incorporate bottom-up analysis of climate change issues to help inform stock selection in ESG equity products.

The real estate and other private markets teams are working to improve bottom-up data gathering, seeking to align data quality and structure to what is available in the public markets, this will enable further improvements to integration of climate change in these asset classes.

We are working closely with asset owner clients that are looking for climate-related integration services beyond fund management mandates to include additional consultancy services, data provisions and analysis. We believe this is a value-add we can offer more broadly to improve integration across the investing landscape and is an opportunity we are keenly exploring through existing client conversations and request for proposals.

- (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:

We have an internal stewardship question bank for all sectors.

We are members of the Powering Past Coal Alliance and have been key stakeholders in engaging with the alliance as it seeks to tighten its position. Along with this we seek to publish a new coal position statement with a clear strategy aligning to the alliance supported with priority engagement efforts on coal retirement.

(B) Gas

Describe your strategy:

We have an internal stewardship question bank for all sectors.

Our second largest emitter is an integrated Oil & Gas company. Along with a number of other companies, see the TCFD report for the full list of companies.

For Oil & Gas companies we are pressing companies to better understand how they seek to compete in a decarbonised future, whether this be via electrification (green electrons) or fuels (green molecules). This helps us to determine the competitive landscape, the capital allocation decisions they will be making and the credibility of their plans given that the different approaches require different technologies. We are keenly aware that many firms have taken steps back when it comes to electrification using renewables, which is also indicated via our credibility assessment of energy companies.

**(C) Oil**

Describe your strategy:

We have an internal stewardship question bank for all sectors.

Our second largest emitter is an integrated Oil & Gas company. Along with a number of other companies, see the TCFD report for the full list of companies.

For Oil & Gas companies we are pressing companies to better understand how they seek to compete in a decarbonised future, whether this be via electrification (green electrons) or fuels (green molecules). This helps us to determine the competitive landscape, the capital allocation decisions they will be making and the credibility of their plans given that the different approaches require different technologies. We are keenly aware that many firms have taken steps back when it comes to electrification using renewables, which is also indicated via our credibility assessment of energy companies.

**(D) Utilities**

Describe your strategy:

We have an internal stewardship question bank for all sectors.

Our third largest emitter is a utility company based in Europe. Along with a number of other companies, see the TCFD report for the full list of companies.

**(E) Cement**

Describe your strategy:

We have an internal stewardship question bank for all sectors.

Our largest emitter is a cement company predominantly based in India. See the TCFD report for the full list of companies which includes other cement firms.

We have done considerable internal research on the challenges to decarbonising cement and the different routes such as CCUS for incumbents and potentially alternative production methods through the use of alternative binders and clinker-free cement.

**(F) Steel**

Describe your strategy:

We have an internal stewardship question bank for all sectors.

For example, a keen focus on how steel production moves towards H2DRI-EAF and increased secondary production routes.

**(G) Aviation**

Describe your strategy:

We have an internal stewardship question bank for all sectors.

**(H) Heavy duty road**

Describe your strategy:

We have an internal stewardship question bank for all sectors.  
In this sector technology readiness needs improvements (relative to light duty road) as such we are expecting to see companies addressing this.

**(I) Light duty road**

Describe your strategy:

We have an internal stewardship question bank for all sectors.

We believe that electrification technology readiness is accelerating in this sector and expect to see continued efforts from investee companies to take advantage. This will be highly dependent on the type of company, its regional markets and position in the value-chain. Nonetheless, setting EV penetration targets, vertical integration into EV charging stations, securing battery supply or vertical integration upstream are potential actions we are looking for.

**(J) Shipping**

Describe your strategy:

We have an internal stewardship question bank for all sectors.

**(K) Aluminium**

Describe your strategy

We have an internal stewardship question bank for all sectors.

You will find that some aluminium producers are included in our top financed emitters list.

As part of internal research into the capacity requirements of mining in the context of the energy transition, we are looking closely into the technology breakthroughs required in aluminium and seeking to allocate capital and engage with investee companies appropriately.

**(L) Agriculture, forestry, fishery**

Describe your strategy:

We have an internal stewardship question bank for all sectors.

**(M) Chemicals**

Describe your strategy:

We have an internal stewardship question bank for all sectors.

This is a broad sector, however, we are looking closely at plastic recycling demands given existing commitments, we believe there is a likelihood for tight supply in this market and have started to engage with producers on this. Secondly, we the Chemicals sector is one of the highest consumers of energy, we expect to see improvements made in energy efficiency and where possible shifts towards more renewable sources.

**(N) Construction and buildings**

Describe your strategy:

We have an internal stewardship question bank for all sectors.

**(O) Textile and leather**

Describe your strategy:

We have an internal stewardship question bank for all sectors.

**(P) Water**

Describe your strategy:

We have an internal stewardship question bank for all sectors.

**(Q) Other**

Specify:

We have an internal stewardship question bank for all sectors.

Describe your strategy:

We have provided a high-level summary for some key sectors:

We have applied a CDP screen as part of our proxy voting efforts, this creates a minimum expectation for all of our equity holdings. This expectation is that the board of all companies takes on the accountability and consideration of climate-related risks and opportunities.

A sector agnostic approach we have taken is a commitment to priority engagements for our top 20 financed emitters across equities, corporate credit and at a combined house-level. This leaves us with a final list of 38 companies that fall within many of these high-emitting sectors. Thanks to the calculation of Financed Emissions as defined by PCAF, it considers our share of emissions as a percentage of ownership of debt and equity. This makes it an effective metric for the purposes of net-zero engagement as these are the most material emissions intensive companies within our holdings.

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

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

<https://www.abrdn.com/docs?editionId=b836f4f9-cdee-40ea-816a-b0c80108c060>

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:

We have worked closely with Planetrics to develop a number of bespoke scenarios that reflect our views and assess climate-related investment risks and opportunities. These are complemented with 7 “off-the-shelf” scenarios as defined by the central banks and supervisors’ part of the Network for Greening the Financial System (NGFS). This also includes the FPS scenario and they have close ties to other leading scenarios such as the IEA Net-Zero scenario. One of the key benefits of this is enabling us to take a probabilistic view of climate-related risks and opportunities and to take more useful granular views on individual sectors and regions. Further information can be found in our Climate Scenario Analysis White Paper - <https://www.aberdeenstandard.com/docs?editionId=8a4a2333-f0cf-4a9c-b87f-ae3040fc8ab5>

We use scenario analysis to understand how resilient our portfolios are to uncertain future transition pathways. Our sector’s operational Scope 1 & 2 is not carbon intensive but understanding the carbon intensity of our investments (Scope 3) and the climate-related risks and opportunities is vital in terms of enabling desired client outcomes, and realising our opportunity related to lower carbon products and services. Our insights are therefore supporting key stages of our investment processes across research, engagement, strategic asset allocation, and investment product solutions. Our year three analysis suggests that approximately three quarters of our existing equity portfolios outcompete their corresponding benchmarks when considered against our view of the most plausible transition pathway as well as our Paris-aligned mean scenario. The scenario analysis results will differ by fund, driven predominantly on the underlying investment strategy of the fund and we are developing solutions to meet the outcome expectations of our clients in relation to sustainability in line with our fiduciary duty.

- (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

We manage climate-related risks through our research processes, data, and decision-making.

Research is the foundation of our approach to understanding and managing climate-related risks and opportunities. Our research provides insights on regulatory and industry trends across regions. It also helps us understand the physical and transition risks and opportunities, enabling us to take informed decisions about how and where to invest.

Climate-related research is carried out by our Research Institute and Sustainability Insights Team. Our scenario analysis platform enables us to take a forward-looking view and we can use the results to test the valuation impact on individual funds. Beyond this, our insights are published publicly in the form of research papers, articles, and webinars. Our catalogue of original research is extensive and this expertise supports our decision-making and effective management of climate-related risks.

Our climate change toolkit

We have developed a range of tools to help integrate climate-related risk into our decision-making for our active investment process and we continue to build our capabilities year-on-year. The underlying data is drawn from a range of vendors with different levels of data coverage. Data coverage is limited by various factors including: lack of uniform disclosure and methodological standardisations. This is a common challenge, as best practice remains emergent despite accelerate efforts toward global disclosure frameworks.

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

Our governance framework supports the management of climate-related risks, and we address asset manager specific TCFD guidance on the following pages.

Page 14 of our Sustainability and TCFD report provides more information: <https://www.abrdn.com/docs?editionId=afb53552-b713-47a1-888b-ef5edb35b776>

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

(1) Describe your process

All fund managers will have access to our internal research and toolkit, the extent to which risks identified are managed will be dependent on the materiality of the risks identified to the fund strategy and investment mandate. Certain climate fund strategies, for example, will use these tools on a regular basis or another example being funds that have set carbon commitments and mitigate exposure to carbon risks via staying compliant with such mandated commitments.

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

Our governance framework supports the management of climate-related risks, and we address asset manager specific TCFD guidance on the following pages.

Page 14 of our Sustainability and TCFD report provides more information: <https://www.abrdn.com/docs?editionId=afb53552-b713-47a1-888b-ef5edb35b776>

(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 publicly 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.abrdn.com/docs?editionId=afb53552-b713-47a1-888b-ef5edb35b776>

**(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.abrdn.com/docs?editionId=afb53552-b713-47a1-888b-ef5edb35b776>

**(C) Internal carbon price**

- (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

**(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.abrdn.com/en-gb/institutional/insights-and-research/why-the-choice-of-carbon-metric-matters>

**(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.abrdn.com/en-gb/institutional/insights-and-research/why-the-choice-of-carbon-metric-matters>

**(F) Avoided 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

**(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
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

<https://www.abrdn.com/en-gb/intermediary/insights-and-research/measuring-a-portfolios-alignment-with-net-zero-goals>

(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
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

<https://www.aberdeenstandard.com/docs?editionId=8a4a2333-f0cf-4a9c-b87f-ae3040fc8ab5>

(J) Other metrics or variables

- (K) Our organisation did not use or publicly 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 publicly 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.abrdn.com/docs?editionId=afb53552-b713-47a1-888b-ef5edb35b776>

(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.abrdn.com/docs?editionId=afb53552-b713-47a1-888b-ef5edb35b776>

(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.abrdn.com/docs?editionId=afb53552-b713-47a1-888b-ef5edb35b776>

- (D) Our organisation did not publicly 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)
- (K) Other regional framework(s)
- (L) Other sectoral/issue-specific framework(s)
- (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
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PGS 48	CORE	PGS 47.2	PGS 48.1, SO 1	PUBLIC	Sustainability outcomes	1, 2
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**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
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PGS 48.1	PLUS	PGS 48	N/A	PUBLIC	Sustainability outcomes	1, 2
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**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
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PGS 49	PLUS	PGS 47	PGS 49.1	PUBLIC	Human rights	1, 2
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**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:

See answers in D)

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

☑ (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:

We rarely have access to the individuals affected by the policies, activities, products, services or business relationships of our investees. We therefore look to representative organisations for insights. This can include the UN and its Special Rapporteurs, NGOs, international development agencies, trade unions and non-profit organisations. They publish research reports on human-rights topics and in some instances contact us for ongoing dialogue. At times, we also have opportunities to engage with these representatives through our membership in industry groups, such as the Investor Alliance for Human Rights.

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

Specify:

Explain how these activities were conducted:

We focus our human-rights work on high-risk areas. We identify high-risk areas based on the severity of potential adverse human-rights impacts and the likelihood of the impact occurring. In practice, this means considering human rights from both a macro (or top-down) and micro (or bottom-up) perspective.

- Top-down: We draw on political and social research to understand the human-rights environment and its interaction with our investments. Our aim here is to identify key rights at risk in countries and regions, using proprietary ESG frameworks and indices. At the investment level, this research is used to inform our analysis of both government and corporate securities.
- Bottom-up: The salient human-rights risks that a company faces also vary by the types of activities in which it is involved. We use a high-level summary of key human-rights issues by industry to guide our analysis. This list is not exhaustive but helps us to focus our attention in the most salient areas. Many businesses have complex business models, corporate structures, supply chains and/or business partnerships that can change the nature of salient human-rights issues, so a fuller analysis on a company-by-company basis is also undertaken by our investment teams.

These considerations are used to inform our engagement and stewardship activities, and ultimately our investment decisions. As a large global investor, we are often in a position of influence, which can be used to drive positive change. We prioritise engagement with companies and issuers in these situations:

- The business model and/or activities have a high potential for adverse human-rights impacts.
- We believe there are gaps between a human-rights policy and its implementation.
- We have identified the human-rights environment or operating context as high risk.
- The company or issuer has a known history of adverse human-rights impacts.
- Reports from affected groups or rights-holder representatives raise significant concerns.

Our policy is to encourage companies and issuers to use the UN Guiding Principles on Business and Human Rights (UNGPs) to guide their approach to identifying and managing human-rights issues. We also encourage increased transparency and meaningful public disclosure, as this helps us to make more informed investment decisions on human-rights issues.

Human rights issues are often complex and persistent. Through active engagement, we can help guide our investees toward best practices and participate in complex, nuanced conversations aimed at addressing systemic human-rights issues. Where our contacts are unwilling to engage or we see insufficient progress, we will look for ways to increase our leverage, e.g., by joining collaborative industry groups. As a last resort, we may consider selling our holdings.

For further information, please refer to our human rights approach document on our website.

- (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:

Human rights are typically an under-researched area in the investment community, and corporate disclosures are generally very poor. Therefore, some of our usual information sources, which would normally feed into our investment research, are not available to us. In undertaking human-rights research, we frequently rely on independent sources such as NGOs, trade unions, international development organisations and academia. We also get useful insights from non-profit organisations such as the Corporate Human Rights Benchmark, the Access to Medicine Index and the Access to Nutrition Initiative (ATNI).

**(B) Media reports**

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

Please see our response in A)

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

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

Please see our response in A)

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

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

Please see our response in A)

**(E) Data provider scores or benchmarks**

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

Please see our response in A)

**(F) Human rights violation alerts**

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

Please see our response in A)

**(G) Sell-side research**

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

Please see our response in A)

**(H) Investor networks or other investors**

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

Please see our response in A)

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

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

Please see our response in A)

(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

**(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**

Describe:

To be clear, we used our influence to encourage our investees to provide access to remedies where they cause adverse human rights impacts. Investees have multiple stakeholders that seek to influence them, so it is not appropriate for us to claim that our influence ensures that remedy is provided, as this may be attributed to multiple drivers, including but not limited to abrdn's voice. For example, we have engaged with Vale and BHP multiple times in relation to reparations following tailings dam collapses at Samarco.

(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?

	(6) Real estate	(8) Hedge funds
<b>Organisation</b>		
(A) Commitment to and experience in responsible investment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Responsible investment policy(ies)	<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"/>
<b>People and Culture</b>		
(D) Adequate resourcing and incentives	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(E) Staff competencies and experience in responsible investment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Investment Process</b>		
(F) Incorporation of material ESG factors in the investment process	<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 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 type="checkbox"/>
<b>Stewardship</b>		
(I) Policy(ies) or guidelines on stewardship	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(J) Policy(ies) or guidelines on (proxy) voting	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(K) Use of stewardship tools and activities	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(L) Incorporation of risks connected to systematic sustainability issues in stewardship practices	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(M) Involvement in collaborative engagement and stewardship initiatives	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(N) Engagement with policy makers and other non-investee stakeholders	<input type="checkbox"/>	<input type="checkbox"/>
(O) Results of stewardship activities	<input type="checkbox"/>	<input type="checkbox"/>
<b>Performance and Reporting</b>		
(P) ESG disclosure in regular client reporting	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(Q) Inclusion of ESG factors in contractual agreements	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(R) We do not consider any of the above responsible investment aspects important in the assessment of external investment managers	<input type="radio"/>	<input type="radio"/>

## 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	<p>Real estate example:</p> <p>The key intervention points when selecting a real estate portfolio and investment manager apply on (1) Screening and (2) through due diligence which populates the Investment Committee memo for discussion at the Investment committee.</p> <ol style="list-style-type: none"> <li>1. Screening: In order to screen potential investments, the REMM team have a screening guidance document which outlines the screening process.</li> </ol> <p>This includes ESG guidance which require the following questions to be answered alongside the other screening criteria in order to determine whether to proceed with the investment:</p> <ol style="list-style-type: none"> <li>a. Is there an ESG policy in place that can be easily shared?</li> <li>b. Is there a dedicated ESG resource?</li> <li>c. Does/will the fund submit to GRESB?</li> <li>d. Does the manager have a net-zero commitment in place, or documentation to show how they manage climate physical and transition risks?</li> </ol> <ol style="list-style-type: none"> <li>2. Due diligence for Investment Committee: For IC approval relating to new investments, there is a two-stage IC decision-making process (i.e. Stage 1 and Stage 2 Investment Committee). A representative of the Real Estate ESG team sits within the REMM Investment Committee ("IC"), to provide feedback but has no voting power.</li> </ol>
(B) Appointment	<p>Real Estate</p> <p>Incorporate client-specific ESG obligations and requirements to side letters and other legal documentation when subscribing to an external investment manager's fund.</p> <p>Hedge Fund</p> <p>For hedge fund mandates, ESG is part of the initial (and ongoing) Investment and Operational Due Diligence of a fund/manager, and it is taken into overall consideration by our investment committee when a new fund is being assessed for our 'buy list'. However, a low ESG score at either the Firm- or Fund-level on its own does not necessarily prevent an investment but will be taken into overall consideration alongside the rest of the due diligence and relevant quantitative analysis. In the past, it was typically governance-related issues that has prevented a fund from being approved. What's important to us is where a Fund and/or Firm which may currently be, or which may have historically been, rated poorly demonstrates a willingness to engage and consider improving upon areas which we deem to be relevant but where we deem it to be deficient.</p>

#### Real Estate

ESG consideration and analysis is carried out through the management of existing investments through (1) Annual manager ESG survey (2) ESG data request and (3) annual Investment plan reviews including a holistic ESG risk and review process.

#### Hedge Fund

(C) Monitoring

Once invested the team continues the on-going engagement with managers to raise awareness and encourage ESG adoption into decision-making process. At a portfolio level we have a two-pronged approach to ESG evaluation and monitoring. Using an on-line survey we review our managers annually on a number of ESG criteria and results are combined in order to assess portfolio level positioning, track trends and benchmark responses. In order to drill down further at a holdings level and identify any relevant ESG issues and exposures for the investment, depending on the industry, geography, or investment strategy, we utilize third party aggregation risk platforms to obtain position-level information from the administrator for each participating account. These positions can be aggregated to show exposure at the overall portfolio level and alternatively broken down to view holdings by asset class, financial product, country, industry, and credit rating among other factors. We also employ a systematic ESG data collector within the risk tool that we use to analyse portfolio exposure from an ESG perspective.

## 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)

**Performance and Reporting**

(I) ESG disclosure in regular client reporting

(J) Inclusion of ESG factors in contractual agreements

(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, OO 21, 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
- (E) Details of their engagement activities with policy makers
- (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

## APPOINTMENT

### SEGREGATED MANDATES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 8	CORE	OO 5.2, OO 13, OO 21	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
- (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?**

### (6) Real estate

### (8) Hedge funds

#### 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)

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### Investment Process

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(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)

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### Performance and Reporting

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(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 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.**

For hedge funds, we are in our 3rd year of using an on-line survey to review our managers on a number of ESG criteria and results are combined in order to assess portfolio level positioning, track trends and benchmark responses year-over-year. We continue to evolve this questionnaire and, over time, we may look to use this as a way to measure our active engagement as we work with managers to help advance their own ESG policies.

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?**

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

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

(I) Whether they participated in collaborative engagements and stewardship initiatives	<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"/>
(K) Other	<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"/>

## 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.

Underlying Investment managers are asked to complete an ESG Questionnaire which focuses on understanding the Manager's ESG policies, their adherence to industry principles, and key ESG risks of the investment and how they are being addressed. Based on that analysis each fund gets an ESG Score:

- Maintain: REMM team is satisfied with the underlying manager's reporting and policies – no further action required
- Monitor: REMM team will monitor the underlying investment over the coming months in regards to their ESG reporting
- Engage: REMM team will actively engage with the Underlying Investment manager to discuss improvements to their ESG approach and reporting.

ESG Scores may be ascribed with the assistance of the Real Estate ESG team.

Where an Underlying Investment is ascribed an 'Engage' rating, a follow-up ESG engagement meeting with the Underlying Investment manager is required, where engagement with their ESG or investment professionals, investment committee or other representatives are held. The purpose of the meeting is to engage and advocate for the Underlying Investment manager to improve their ESG policies/practices/performance, and managers are notified about their rating and placement on watchlist. A member of the Real Estate ESG team leads the meeting.

The REMM team reviews the ratings annually, and update the ratings as appropriate based on discussions with the underlying managers and GRESB scores where applicable.

Should improvements not be made to the Underlying Investment manager's ESG processes, the manager should be made aware that further selection may be held off for new mandates or allocation of additional capital until the REMM team's ESG concerns are rectified.

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?**

	(6) Real estate	(8) Hedge funds
(A) Engagement with their investment professionals, investment committee or other representatives	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Notification about their placement on a watch list or relationship coming under review	<input 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 type="checkbox"/>
(D) Termination of the contract if failings persist over a (notified) period, including an explanation of the reasons for termination	<input 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"/>
(F) Other	<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"/>

## 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?

	(6) Real estate	(8) Hedge funds
(A) We checked that the information reported was verified through a third-party assurance process	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(B) We checked that the information reported was verified by an independent third party	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(C) We checked for evidence of internal monitoring or compliance	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(D) Other	<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 checked="" 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	(2) Active - quantitative	(3) Active - fundamental	(4) Other strategies
(A) Yes, our investment process incorporates material governance factors	(3) for a minority of our AUM	(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	(3) for a minority of our AUM	(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 beyond our organisation's average investment holding period	(3) for a minority of our AUM	(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
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	(2) Active - quantitative	(3) Active - fundamental	(4) Other strategies
(A) Yes, we have a formal process that includes scenario analyses	(1) for all of our AUM	(1) for all of our AUM	(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)**

Our climate scenario analysis framework estimates equity valuation uplifts and impairments based on seven main categories that drive future revenues of in scope companies:

1. Physical impact - the physical effects of climate change on the value of assets held by companies
2. Adaptation - the ability of companies to adapt to these physical effects
3. Demand Creation - the amount of new demand created as a result of climate driven changes to global economies
4. Demand Destruction - the amount of demand destroyed as a result of climate driven changes to global economies
5. Direct Carbon Cost - the costs of carbon faced by companies resulting from mitigation policies

6. Abatement - the ability of companies to abate carbon costs by reducing or eliminating emissions

7. Cost Pass Through - The extent that companies may be able to pass costs on to end-users based on the market dynamic of the sector and region in which they operate

Within active equities this tool and other climate capabilities are available for our analysts as part of ESG data that can feed into analysis and engagement, and fund managers review the output of the climate scenario analysis at least quarterly as part of our regular portfolio risk reviews.

Each year, we update our bespoke climate scenarios to incorporate the durable signals from any changes to the underlying drivers of long-term transition and physical climate risk.

We have collaborated with our modelling partner Planetrics to develop and update our analysis. We continue to improve on the insight available through typical approaches, and thereby better enable the integration of climate scenarios into our investment decisions and climate solutions for clients.

## 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?

	(1) Active - quantitative	(2) Active - fundamental	(3) Other strategies
(A) We incorporate material governance-related risks into our financial analysis and equity valuation or security rating process	(1) in all cases	(1) in all cases	(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	(1) in all cases	(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	(1) in all cases	(1) in all cases

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

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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	(2) Active - quantitative	(3) Active - fundamental	(4) Other strategies
(A) We incorporate qualitative and/or quantitative information on current performance across a range of material ESG factors	(3) in a minority of cases	(1) in all cases	(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	(3) in a minority of cases	(1) in all cases	(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	(3) in a minority of cases	(1) in all cases	(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	(3) in a minority of cases	(1) in all cases	(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	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.

Active fundamental:

Within active equities, our investment analysts identify the most financially material ESG factors to form a forward looking view of how a business will manage risks and capture opportunities. Our analysts focus on what they deem to be the most material factors to understand the financial impact of ESG factors on a company's future business performance, financial position, and/or market perception. When identifying material ESG factors, we pay close attention to how these factors affect a business both today (operations, earnings, and current valuation) and tomorrow (reputation and longer term valuation). Our research notes include four key components as part of the ESG materiality assessment:

- 1.) What is our view on the quality of the corporate governance and oversight of the business and management?
- 2.) What are the most material environmental, social, and operational governance issues the company must manage and how are these being addressed?
- 3.) What is our conclusion on how the management of the most material ESG risks and opportunities will impact the business' operational performance and valuation?
- 4.) What is our ultimate rating of the business' management of ESG factors and how does it factor into the investment conclusion? Does this differ from the abrdn House Score and MSCI? Do we have a differentiated view?

The following example is the summary of research into the most material environmental, social and governance risks and opportunities, and an assessment of how the business is managing its exposure to ESG factors with a focus on financial impact rather than double materiality.

Company X rating: 2 (i.e. above average)

Company Governance is generally good, with no unusual structures or share classes. The only areas of weakness are that several board members area overly tenured (6 our 14 are >15 years, with 3 at 40 years), but there has been some refreshment with 4 members <5 years' tenure.

Material operational governance and E&S factors:

- Supply Chain Management: X has detailed supplier and conflict minerals policy statements and associated codes of conduct which suppliers are required to sign up to. X uses a third party service to assess and monitor supplier sustainability performance – this is currently (2022) running at 50% suppliers. The company also carries out screening on suppliers to mitigate the risk of using forced labour.
- Product Safety & Recall: although also regulated by the FDA, Product Quality and Recall risk is lower at X than at Healthcare Equipment companies, as X's equipment is used for drug manufacturing and testing, but is not implanted into patients or used during surgical procedures. X's track record is robust for a company of its size, with zero class I recall in the past four years, and over the past 3-4 years the number of class I recalls has been much lower than the previous five years.
- Waste Management: X have an Environment, Health and Safety policy, part of which addresses waste management. To drive accountability and continuous improvement, they have established goals designed to achieve improvements over FY20-24. As it relates to waste management, they aim to reduce the percentage of non-hazardous/non-regulated waste sent to landfills or incinerations by 15%. To achieve this, facility-level teams are able to use the DBS Easte Minimisation Toolkit, which introduced in FY20, with strong track record of reduced waste at subsidiary Y where it was first introduced.

X's management of its most material ESG factors is strong and above industry peers, and as a result I believe it merits an ESG Q2 rating. In addition, it's worth highlighting that the strength (and the detail the company provides) in supply chain and waste management is an

in lean manufacturing).

Active quantitative and passive

We have developed a range of passive funds which track sustainable indices. We designed the indices in partnership with an index provider, with abrdn setting the exclusion policy, sustainable tilts and risk constraints.

The indices aim to deliver higher index ESG scores, lower carbon intensity and higher green revenues.

ESG factors are also incorporated into the equity selection process of the Sustainable Index funds by applying an exclusion policy in the index construction. In order to help manage long term sustainability risks for our clients we exclude companies involved in certain business activities or which have been involved in ESG controversies.

In our active quantitative strategies, we account for each company's ESG risks and opportunities alongside more traditional factors (valuation, company size, sector, volatility etc). We do this by incorporating ESG scores, carbon intensity and company green revenues.

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	(2) Active - quantitative	(3) Active - fundamental	(4) Other strategies
(A) Material ESG factors contribute to the selection of individual assets and/or sector weightings within our portfolio construction and/or benchmark selection process	(3) for a minority of our AUM	(1) for all of our AUM	(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	(3) for a minority of our AUM	(1) for all of our AUM	(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	(3) for a minority of our AUM	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(D) Other ways material ESG factors contribute to your portfolio construction and/or benchmark selection process	(3) for a minority of our AUM	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(E) Our stock selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors	o	o	o	o

**(D) Other ways material ESG factors contribute to your portfolio construction and/or benchmark selection process - Specify:**

In our Sustainable Indexation and Active Quantitative portfolios we specify index/portfolio level targets for key metrics such as ESG scores, carbon intensity and green revenue.

## 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.**

Our Sustainable index funds incorporate a range of ESG factors in the index construction. The index is optimised to target improvements on a range of ESG metrics compared to a traditional index. The targets include:

- 10-20% improvement in index level ESG scores
- 50% reduction in index carbon intensity
- 50% increase in index green revenue

This results in higher weighting to companies which have performed well on these ESG factors and lower weighting to those which performed poorly.

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**

Explain:

We commissioned a range of customised indices for our core passive ESG offering.

**(B) We compare the methodology amongst the index providers available**

Explain:

When choosing an index provider we compared the methodologies from a range of providers. Some of the key considerations included:  
ESG data quality and coverage  
Index construction methodology  
Index construction experience

**(C) We compare the costs of different options available in the market**

Explain:

Cost is an important component of the selection process. We compare both the explicit index costs (e.g. licence fees) and implicit costs to our clients (e.g. transaction and implementation costs).

**(D) Other**

Specify and explain:

In our segregated mandates, we assist clients and prospects with the selection and design of ESG indices.

## 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?**

(1) Active - quantitative      (2) Active - fundamental      (3) Other strategies

(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	<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 listed equity 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

(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

## 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.

We would highlight the example of Drax. We exited our position in 2023 due to concerns about the business' management of environmental factors and the risk this posed to market sentiment and valuation, as well as continued government support for the company which could impact earnings.

We initiated discussions with Drax's Director of Sustainability in autumn 2022, in part prompted by a BBC investigation questioning practices in the company's supply chain. Our primary concern was the degree to which the sustainability credentials of Drax's bioenergy production are contingent on the replanting of felled trees, which must remain in place for decades in order to offset the CO2 emissions from burning the pellets.

While we were encouraged by many of the measures Drax has in place to promote a sustainable supply chain, it remained unclear how the life of replanted trees can be monitored and ensured on privately held land and we were concerned about the sustainability standards of Drax's pellet suppliers. We were also concerned by Drax's carbon accounting; the company states that it is not adding to carbon emissions, which underpins the case for government subsidies and bioenergy's exemption from emission trading schemes. But the burning of pellets generates more CO2 than burning coal; it will be years before Drax will capture any CO2 using BECCS and in the meantime large volumes of carbon are pumped into the atmosphere.

In our view, both of these points are important for Drax to address ever growing criticisms from parts of the academic community about the environmental sustainability of bioenergy which were influencing public perception.

We communicated to the company our thoughts and we are cognizant of the time required for companies to take action to respond to investors' requests. That said, we had reservations about how Drax responded to growing concerns raised by investors and other stakeholders about the environmental sustainability of its bioenergy production.

This emerging factor coincided with uncertainty about government support for the company, as demonstrated by the government's decision not to include Drax's BECCS (Bioenergy with Carbon Capture and Storage) project in the first round of carbon removal projects eligible for potential government subsidies.

This project was crucial for Drax to reach its goal of negative emissions.

As a result, we took the view that the poor management of environmental factors facing the business, coupled with increasing market scrutiny, posed a risk to valuation and earnings, creating an undesirable level of risk for our investment and we exited.

## 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	(2) for a majority 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	○	○

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

Our climate scenario analysis framework estimates valuation uplifts and impairments (and probability of default) based on seven main categories that drive future revenues of in scope companies:

1. Physical impact - the physical effects of climate change on the value of assets held by companies
2. Adaptation - the ability of companies to adapt to these physical effects
3. Demand Creation - the amount of new demand created as a result of climate driven changes to global economies
4. Demand Destruction - the amount of demand destroyed as a result of climate driven changes to global economies
5. Direct Carbon Cost - the costs of carbon faced by companies resulting from mitigation policies

6. Abatement - the ability of companies to abate carbon costs by reducing or eliminating emissions

7. Cost Pass Through - The extent that companies may be able to pass costs on to end-users based on the market dynamic of the sector and region in which they operate

Within Fixed Income this tool and other climate capabilities are available for our analysts as part of ESG data that can feed into analysis and engagement.

Each year, we update our bespoke climate scenarios to incorporate the durable signals from any changes to the underlying drivers of long-term transition and physical climate risk.

We have collaborated with our modelling partner Planetrics to develop and update our analysis. We continue to improve on the insight available through typical approaches, and thereby better enable the integration of climate scenarios into our investment decisions and climate solutions for clients.

## 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="radio"/>	<input type="radio"/>	<input type="radio"/>

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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

Select from dropdown list:

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

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

○ (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	○	○	○

## 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		
(F) Our security 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
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.**

We launched in 2023 a screened corporate bond tracker fund (£8bn AuM as at 31 May 2024). Exclusions include:

- Controversial Weapons: All companies classified as involved in the core weapon system or components and services that are considered tailor-made and essential for the lethal use of controversial weapons.
- UNGC violations: All companies that have breached a principle of the UN Global Compact.
- Thermal Coal: All companies deriving 5% or more of their revenue from mining thermal coal, generating electricity from thermal coal, or providing supporting products or services for thermal coal extraction.
- Oil Sands: All companies deriving 5% or more of their revenue from the extraction of oil sands.
- Shale Energy: All companies deriving 5% or more of their revenue from the extraction and/or production of shale energy.
- Tobacco: All companies deriving 5% or more of their revenue from tobacco products including cigarettes, cigars, tobacco, electronic cigarettes, paper used by end consumers for rolling cigarettes, filters, snuff tobacco, etc. It includes tobacco products manufacturers, retailers and distributors, as well as companies providing tobacco-related products or services.

We have also partnered with MSCI to design customised abrdn benchmarks for Global Corporate and UK Corporate Bonds. The customised benchmark for global corporates has the following outcomes although the improvements vs the parent index in terms of ESG score and climate metrics are approximate:

Exclusions:

- o Severe controversies (as defined by MSCI inclusive of UN Global Compact)
- o Any involvement in manufacture of controversial weapons including nuclear, cluster munitions, landmines, depleted uranium weapons, biological/chemical weapons, blinding lasers, non-detectable fragments, and incendiary weapons
- o All companies deriving 5% or more of their revenue from mining or sale of thermal coal and unconventional oil & gas
- o All companies deriving 5% or more of their revenue from thermal coal based power generation
- o Companies classified as a tobacco producer and companies producing 5% or more revenue from production or distribution of tobacco-related products
- o A 5% improvement in ESG score vs the parent benchmark
- o A 70% reduction in weighted average carbon intensity vs the parent benchmark for global (scope 1 & 2)
- o A 40% increase in green revenues vs the parent benchmark.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 10	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 fixed income assets?**

**(A) We commission customised indexes**

Explain:

We designed our own customised, sustainably tilted indices in collaboration with MSCI and worked with Bloomberg to design a screened benchmark. We currently manage a pooled passive fund (£8bn as at 31 May 2024) against the screened benchmark.

**(B) We compare the methodology amongst the index providers available**

Explain:

When we designed these customised indices we analysed the approaches taken by other index providers. We advise segregated clients on the best 'off the shelf' available options based on client requirements, among index providers wherever appropriate.

**(C) We compare the costs of different options available in the market**

Explain:

We believe that the costs of our passive pooled ESG products are competitive and we perform an annual assessment of value for pooled products to ensure this remains the case. In addition, we use our index management experience to improve the efficiency of our customised indices for example controlling for trading costs through minimum size cut-offs and introducing turnover restrictions. We advise segregated clients on the most appropriate 'off the shelf' available options based on client requirements, among index providers wherever appropriate.

**(D) Other**

# 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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(F) We do not have a formal process to identify and incorporate ESG risks and ESG incidents into our risk management process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## 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.**

EDP, a Portuguese utility, is regarded as a transition leader in our climate transition framework. The company not only sets ambitious decarbonisation targets but also consistently achieves them while setting even more aggressive goals. By 2030, EDP aims to reduce its specific CO2 emissions by 98% compared to 2015, which is one of the most ambitious targets in the sector. Moreover, EDP is seen as a global leader in the renewable energy sector and ranks among the largest wind energy producers worldwide.

To provide context, the average emission reductions across scope1 and 2 for the utility sector by 2030 is only projected to reach 23%. EDP, however, has committed to achieve a 90% reduction in scope 1 and 2 emissions by 2030 (vs 2015 baseline) by committing to phasing out all gas-powered generation. Backed by a €25 billion spending plan by 2026, this will make EDP one of the first European generation utilities to pursue a fossil-fuel-free future in the near term and doubling its renewable energy capacity in the process. From a credit fundamental perspective, EDP has a solid balance sheet & low risk profile with a focus on debt reduction. This is further supported by a recent rating upgrade driven by its diversified business mix as well as progress in low carbon energy generation.

## 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

# REAL ESTATE (RE)

## POLICY

### INVESTMENT GUIDELINES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 1	CORE	OO 21, OO 24, OO 26	N/A	PUBLIC	Investment guidelines	1 to 6

What real estate-specific ESG guidelines are currently covered in your organisation's responsible investment policy(ies)?

- (A) Guidelines on our ESG approach to real estate depending on use (e.g. retail and education) and geography
- (B) Guidelines on our ESG approach to new construction
- (C) Guidelines on our ESG approach to major renovations
- (D) Guidelines on our ESG approach to standing real estate investments
- (E) Guidelines on pre-investment screening
- (F) Guidelines on our approach to ESG integration into short-term or 100-day plans (or equivalent)
- (G) Guidelines on our approach to ESG integration into long-term value creation efforts
- (H) Guidelines on our approach to ESG reporting
- (I) Guidelines on our engagement approach related to third-party property managers
- (J) Guidelines on our engagement approach related to tenants
- (K) Guidelines on our engagement approach related to construction contractors
- (L) Our responsible investment policy(ies) does not cover real estate-specific ESG guidelines

## FUNDRAISING

### COMMITMENTS TO INVESTORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 2	CORE	OO 21	N/A	PUBLIC	Commitments to investors	1, 4

For all of the funds that you closed during the reporting year, what type of formal responsible investment commitments did you make in Limited Partnership Agreements (LPAs), side letters, or other constitutive fund documents?

- (A) We incorporated responsible investment commitments in LPAs (or equivalent) as a standard default procedure
- (B) We added responsible investment commitments in LPAs (or equivalent) upon a client's request
- (C) We added responsible investment commitments in side letters upon a client's request
- (D) We did not make any formal responsible investment commitments for the relevant reporting year
- (E) Not applicable; we have not raised funds in the last five years

## PRE-INVESTMENT

### MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 3	CORE	OO 21	RE 3.1	PUBLIC	Materiality analysis	1

During the reporting year, how did you conduct ESG materiality analysis for your potential real estate investments?

(A) We assessed ESG materiality for each property, as each case is unique

Select from dropdown list:

- (1) for all of our potential real estate investments
  - (2) for a majority of our potential real estate investments
  - (3) for a minority of our potential real estate investments
- (B) We performed a mix of property level and property type or category level ESG materiality analysis
- (C) We assessed ESG materiality at the property type or category level only
- (D) We did not conduct ESG materiality analysis for our potential real estate investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 3.1	CORE	RE 3	N/A	PUBLIC	Materiality analysis	1

During the reporting year, what tools, standards and data did you use in your ESG materiality analysis of potential real estate investments?

- (A) We used GRI standards to inform our real estate ESG materiality analysis
- (B) We used SASB standards to inform our real estate ESG materiality analysis
- (C) We used the UN Sustainable Development Goals (SDGs) to inform our real estate ESG materiality analysis
- (D) We used GRESB Materiality Assessment (RC7) or similar to inform our real estate ESG materiality analysis
- (E) We used climate disclosures, such as the TCFD recommendations or other climate risk and/or exposure analysis tools, to inform our real estate ESG materiality analysis
- (F) We used the UN Guiding Principles on Business and Human Rights (UNGPs) to inform our real estate ESG materiality analysis
- (G) We used geopolitical and macro-economic considerations in our real estate ESG materiality analysis
- (H) We used green building certifications to inform our real estate ESG materiality analysis
- (I) We engaged with the existing owners and/or managers (or developers for new properties) to inform our real estate ESG materiality analysis
- (J) Other

## DUE DILIGENCE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 4	CORE	OO 21	N/A	PUBLIC	Due diligence	1

During the reporting year, how did material ESG factors influence your selection of real estate investments?

(A) Material ESG factors were used to identify risks

Select from dropdown list:

- (1) for all of our potential real estate investments
- (2) for a majority of our potential real estate investments
- (3) for a minority of our potential real estate investments

(B) Material ESG factors were discussed by the investment committee (or equivalent)

Select from dropdown list:

- (1) for all of our potential real estate investments
- (2) for a majority of our potential real estate investments
- (3) for a minority of our potential real estate investments

(C) Material ESG factors were used to identify remedial actions for our 100-day plans (or equivalent)

Select from dropdown list:

- (1) for all of our potential real estate investments
- (2) for a majority of our potential real estate investments
- (3) for a minority of our potential real estate investments

(D) Material ESG factors were used to identify opportunities for value creation

Select from dropdown list:

- (1) for all of our potential real estate investments
- (2) for a majority of our potential real estate investments
- (3) for a minority of our potential real estate investments

(E) Material ESG factors informed our decision to abandon potential investments in the due diligence phase in cases where ESG risks were considered too high to mitigate

Select from dropdown list:

- (1) for all of our potential real estate investments
- (2) for a majority of our potential real estate investments
- (3) for a minority of our potential real estate investments

(F) Material ESG factors impacted investments in terms of the price offered and/or paid

Select from dropdown list:

- (1) for all of our potential real estate investments
- (2) for a majority of our potential real estate investments
- (3) for a minority of our potential real estate investments

(G) Material ESG factors did not influence the selection of our real estate investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 5	CORE	OO 21	N/A	PUBLIC	Due diligence	1

Once material ESG factors have been identified, what processes do you use to conduct due diligence on these factors for potential real estate investments?

(A) We conduct a high-level or desktop review against an ESG checklist for initial red flags

Select from dropdown list:

- (1) for all of our potential real estate investments
- (2) for a majority of our potential real estate investments

- (3) for a minority of our potential real estate investments
- (B) We send detailed ESG questionnaires to target properties**  
Select from dropdown list:
  - (1) for all of our potential real estate investments**
  - (2) for a majority of our potential real estate investments
  - (3) for a minority of our potential real estate investments
- (C) We hire third-party consultants to do technical due diligence on specific material ESG factors**  
Select from dropdown list:
  - (1) for all of our potential real estate investments**
  - (2) for a majority of our potential real estate investments
  - (3) for a minority of our potential real estate investments
- (D) We conduct site visits**  
Select from dropdown list:
  - (1) for all of our potential real estate investments**
  - (2) for a majority of our potential real estate investments
  - (3) for a minority of our potential real estate investments
- (E) We conduct in-depth interviews with management and/or personnel**  
Select from dropdown list:
  - (1) for all of our potential real estate investments**
  - (2) for a majority of our potential real estate investments
  - (3) for a minority of our potential real estate investments
- (F) We conduct detailed external stakeholder analysis and/or engagement**  
Select from dropdown list:
  - (1) for all of our potential real estate investments**
  - (2) for a majority of our potential real estate investments
  - (3) for a minority of our potential real estate investments
- (G) We incorporate ESG due diligence findings in all of our relevant investment process documentation in the same manner as for other key due diligence, e.g. commercial, accounting and legal**  
Select from dropdown list:
  - (1) for all of our potential real estate investments**
  - (2) for a majority of our potential real estate investments
  - (3) for a minority of our potential real estate investments
- (H) Our investment committee (or an equivalent decision-making body) is ultimately responsible for ensuring all ESG due diligence is completed in the same manner as for other key due diligence, e.g. commercial, accounting and legal**  
Select from dropdown list:
  - (1) for all of our potential real estate investments**
  - (2) for a majority of our potential real estate investments
  - (3) for a minority of our potential real estate investments
- (I) Other
- (J) We do not conduct due diligence on material ESG factors for potential real estate investments

# SELECTION, APPOINTMENT AND MONITORING OF THIRD-PARTY PROPERTY MANAGERS

## SELECTION PROCESS OF THIRD-PARTY PROPERTY MANAGERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 6	CORE	OO 26	N/A	PUBLIC	Selection process of third-party property managers	1, 4

During the reporting year, how did you include material ESG factors in all of your selections of third-party property managers?

- (A) We requested information from potential third-party property managers on their overall approach to material ESG factors
- (B) We requested track records and examples from potential third-party property managers on their management of material ESG factors
- (C) We requested information from potential third-party property managers on their engagement process(es) with stakeholders
- (D) We requested documentation from potential third-party property managers on their responsible procurement practices, including responsibilities, approach and incentives
- (E) We requested the assessment of current and planned availability and aggregation of metering data from potential third-party property managers
- (F) Other
- (G) We did not include material ESG factors in our selection of third-party property managers

## APPOINTMENT PROCESS OF THIRD-PARTY PROPERTY MANAGERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 7	CORE	OO 26	N/A	PUBLIC	Appointment process of third-party property managers	1, 4

How did you include material ESG factors when appointing your current third-party property managers?

- (A) We set dedicated ESG procedures in all relevant property management phases  
Select from dropdown list:
  - (1) for all of our third-party property managers
  - (2) for a majority of our third-party property managers
  - (3) for a minority of our third-party property managers
- (B) We set clear ESG reporting requirements  
Select from dropdown list:
  - (1) for all of our third-party property managers
  - (2) for a majority of our third-party property managers
  - (3) for a minority of our third-party property managers
- (C) We set clear targets on material ESG factors
- (D) We set incentives related to targets on material ESG factors
- (E) We included responsible investment clauses in property management contracts  
Select from dropdown list:
  - (1) for all of our third-party property managers
  - (2) for a majority of our third-party property managers

- (3) for a minority of our third-party property managers
- (F) Other
- (G) We did not include material ESG factors in the appointment of third-party property managers

## MONITORING PROCESS OF THIRD-PARTY PROPERTY MANAGERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 8	CORE	OO 26	N/A	PUBLIC	Monitoring process of third-party property managers	1, 4

### How do you include material ESG factors when monitoring current third-party property managers?

- (A) We monitor the performance of quantitative and/or qualitative targets on material environmental factors**  
Select from dropdown list:
  - (1) for all of our third-party property managers
  - (2) for a majority of our third-party property managers**
  - (3) for a minority of our third-party property managers
- (B) We monitor the performance of quantitative and/or qualitative targets on material social factors**  
Select from dropdown list:
  - (1) for all of our third-party property managers
  - (2) for a majority of our third-party property managers**
  - (3) for a minority of our third-party property managers
- (C) We monitor the performance of quantitative and/or qualitative targets on material governance factors**  
Select from dropdown list:
  - (1) for all of our third-party property managers
  - (2) for a majority of our third-party property managers**
  - (3) for a minority of our third-party property managers
- (D) We monitor progress reports on engagement with tenants**  
Select from dropdown list:
  - (1) for all of our third-party property managers**
  - (2) for a majority of our third-party property managers
  - (3) for a minority of our third-party property managers
- (E) We require formal reporting at least yearly**  
Select from dropdown list:
  - (1) for all of our third-party property managers
  - (2) for a majority of our third-party property managers**
  - (3) for a minority of our third-party property managers
- (F) We have discussions about material ESG factors with all relevant stakeholders at least yearly**  
Select from dropdown list:
  - (1) for all of our third-party property managers
  - (2) for a majority of our third-party property managers**
  - (3) for a minority of our third-party property managers
- (G) We conduct a performance review of third-party property managers against targets on material ESG factors and/or a financial incentive structure linked to material ESG factors
- (H) We have internal or external parties conduct site visits at least yearly**  
Select from dropdown list:
  - (1) for all of our third-party property managers**
  - (2) for a majority of our third-party property managers
  - (3) for a minority of our third-party property managers
- (I) Other
- (J) We do not include material ESG factors in the monitoring of third-party property managers

# CONSTRUCTION AND DEVELOPMENT

## CONSTRUCTION REQUIREMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 9	CORE	OO 24	N/A	PUBLIC	Construction requirements	1

What ESG requirements do you currently have in place for all development projects and major renovations?

- (A) We require the management of waste by diverting materials (e.g. from construction and demolition, reusable vegetation, rocks and soil) from disposal
- (B) We require the minimisation of light and noise pollution that would affect the surrounding community
- (C) We require the performance of an environmental and social site impact assessment
- (D) We require the protection of the air quality during construction
- (E) We require the protection and restoration of the habitat and soils disturbed during construction and/or during previous development
- (F) We require the protection of surface water, groundwater and aquatic ecosystems by controlling and retaining construction pollutants
- (G) We require constant monitoring of health and safety at the construction site
- (H) We require engagement with local communities and other stakeholders during the design and/or planning process
- (I) Other
- (J) We do not have ESG requirements in place for development projects and major renovations

## MINIMUM BUILDING REQUIREMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 10	CORE	OO 24	N/A	PUBLIC	Minimum building requirements	1

What minimum building requirements do you have in place for development projects and major renovations?

- (A) We require the implementation of the latest available metering and internet of things (IoT) technology
- (B) We require the building to be able to obtain a recognised green and/or healthy building certification for new buildings
  - Select from dropdown list:
    - (1) for all development projects and major renovations
    - (2) for a majority of our development projects and major renovations
    - (3) for a minority of our development projects and major renovations
- (C) We require the use of certified (or labelled) sustainable building materials
  - Select from dropdown list:
    - (1) for all development projects and major renovations
    - (2) for a majority of our development projects and major renovations
    - (3) for a minority of our development projects and major renovations
- (D) We require the installation of renewable energy technologies where feasible
  - Select from dropdown list:
    - (1) for all development projects and major renovations
    - (2) for a majority of our development projects and major renovations
    - (3) for a minority of our development projects and major renovations

- (E) We require that development projects and major renovations become net-zero carbon emitters within five years of completion of the construction
- (F) **We require water conservation measures**  
Select from dropdown list:
  - (1) **for all development projects and major renovations**
  - (2) for a majority of our development projects and major renovations
  - (3) for a minority of our development projects and major renovations
- (G) **We require common health and well-being measures for occupants**  
Select from dropdown list:
  - (1) **for all development projects and major renovations**
  - (2) for a majority of our development projects and major renovations
  - (3) for a minority of our development projects and major renovations
- (H) Other
- (I) We do not have minimum building requirements in place for development projects and major renovations

## POST-INVESTMENT

### MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 11	CORE	OO 21	RE 11.1	PUBLIC	Monitoring	1

**During the reporting year, did you track one or more KPIs on material ESG factors across your real estate investments?**

- (A) **Yes, we tracked KPIs on environmental factors**  
Percentage of real estate assets this applies to:
  - (1) >0 to 10%
  - (2) >10 to 50%
  - (3) >50 to 75%
  - (4) >75 to 95%
  - (5) **>95%**
- (B) **Yes, we tracked KPIs on social factors**  
Percentage of real estate assets this applies to:
  - (1) >0 to 10%
  - (2) >10 to 50%
  - (3) >50 to 75%
  - (4) **>75 to 95%**
  - (5) >95%
- (C) **Yes, we tracked KPIs on governance factors**  
Percentage of real estate assets this applies to:
  - (1) >0 to 10%
  - (2) >10 to 50%
  - (3) >50 to 75%
  - (4) >75 to 95%
  - (5) **>95%**
- (D) We did not track KPIs on material ESG factors across our real estate investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 11.1	PLUS	RE 11	N/A	PUBLIC	Monitoring	1

Provide examples of KPIs on material ESG factors you tracked across your real estate investments during the reporting year.

(A) ESG KPI #1

Electricity consumption

(B) ESG KPI #2

Water consumption

(C) ESG KPI #3

Waste production

(D) ESG KPI #4

Carbon performance

(E) ESG KPI #5

Green Building Certification

(F) ESG KPI #6

Physical Climate Risk

(G) ESG KPI #7

(H) ESG KPI #8

(I) ESG KPI #9

(J) ESG KPI #10

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 12	CORE	OO 21	N/A	PUBLIC	Monitoring	1

During the reporting year, what ESG building performance data did you collect for your real estate assets?

(A) Energy consumption

Select from dropdown list:

- (1) for all of our real estate assets
- (2) for a majority of our real estate assets
- (3) for a minority of our real estate assets

(B) Water consumption

Select from dropdown list:

- (1) for all of our real estate assets
- (2) for a majority of our real estate assets
- (3) for a minority of our real estate assets

(C) Waste production

Select from dropdown list:

- (1) for all of our real estate assets
- (2) for a majority of our real estate assets
- (3) for a minority of our real estate assets

(D) Other

Specify:

- Coverage of green building certifications %
- Energy Performance Certificate Ratings by Estimated Rental Value (ERV)

Select from dropdown list:

- (1) for all of our real estate assets
- (2) for a majority of our real estate assets
- (3) for a minority of our real estate assets
- (E) We did not collect ESG building performance data for our real estate assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 13	CORE	OO 21, OO 26	RE 13.1	PUBLIC	Monitoring	1, 2

**What processes do you have in place to support meeting your targets on material ESG factors for your real estate investments?**

**(A) We use operational-level benchmarks to assess and analyse the performance of assets against sector performance**

Select from dropdown list:

- (1) for all of our real estate assets
- (2) for a majority of our real estate assets
- (3) for a minority of our real estate assets

**(B) We implement certified environmental and social management systems across our portfolio**

Select from dropdown list:

- (1) for all of our real estate assets
- (2) for a majority of our real estate assets
- (3) for a minority of our real estate assets

**(C) We make sufficient budget available to ensure that the systems and procedures needed are established**

Select from dropdown list:

- (1) for all of our real estate assets
- (2) for a majority of our real estate assets
- (3) for a minority of our real estate assets

**(D) We hire external verification services to audit performance, systems, and procedures**

Select from dropdown list:

- (1) for all of our real estate assets
- (2) for a majority of our real estate assets
- (3) for a minority of our real estate assets

**(E) We collaborate and engage with our third-party property managers and/or tenants to develop action plans**

Select from dropdown list:

- (1) for all of our real estate assets
- (2) for a majority of our real estate assets
- (3) for a minority of our real estate assets

**(F) We develop minimum health and safety standards**

Select from dropdown list:

- (1) for all of our real estate assets
- (2) for a majority of our real estate assets
- (3) for a minority of our real estate assets

**(G) We conduct ongoing engagement with all key stakeholders, e.g. local communities, NGOs, governments, and end-users**

Select from dropdown list:

- (1) for all of our real estate assets
- (2) for a majority of our real estate assets
- (3) for a minority of our real estate assets

(H) Other

- (I) We do not have processes in place to help meet our targets on material ESG factors for our real estate investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 13.1	PLUS	RE 13	N/A	PUBLIC	Monitoring	1, 2

**Describe up to two processes you put in place during the reporting year to support meeting your targets on material ESG factors.**

(A) Process one

Each real estate Fund has to annually provide an ESG risk and performance dashboard for each asset as well as ESG targets and previous performance. These are reviewed by the ESG RE team and also signed off and reviewed by the Investment Strategy Committee. The mid-year reviews provided by the Strategy and ESG team also enables an additional check to ensure the ESG targets are on track.

(B) Process two

The acquisition process has been updated to ensure material ESG factors are further considered. This includes the introduction of an ESG pre-bid screen to any real estate investment, with an expanded ESG section in the IC paper and a widened ESG scope for further due diligence.

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

**Post-investment, how do you manage material ESG risks and ESG opportunities to create value during the holding period?**

**(A) We develop property-specific ESG action plans based on pre-investment research, due diligence and materiality findings**

Select from dropdown list:

- (1) for all of our real estate investments
- (2) for a majority of our real estate investments
- (3) for a minority of our real estate investments

**(B) We adjust our ESG action plans based on performance monitoring findings at least yearly**

Select from dropdown list:

- (1) for all of our real estate investments
- (2) for a majority of our real estate investments
- (3) for a minority of our real estate investments

**(C) We, or the external advisors that we hire, support our real estate investments with specific ESG value-creation opportunities**

Select from dropdown list:

- (1) for all of our real estate investments
- (2) for a majority of our real estate investments
- (3) for a minority of our real estate investments

(D) Other

(E) We do not manage material ESG risks and opportunities post-investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 15	PLUS	OO 21	N/A	PUBLIC	Monitoring	1, 2

**Describe how you ensure that material ESG risks are adequately addressed in the real estate investments where you hold a minority stake.**

The same extensive ESG approach is taken in a minority stake as in a majority stake – where material ESG risks are part of the acquisition process (where ESG criteria form a key part of the pre-bid, IC paper and due diligence process) as well as ongoing post investment monitoring with RAG rating of the asset against key ESG criteria.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 16	PLUS	OO 21	N/A	PUBLIC	Monitoring	1, 2

**Describe how your ESG action plans are currently defined, implemented and monitored throughout the investment period.**

ESG clauses in the property management contract require property managers to create and monitor ESG action plans quarterly. In addition, asset managers have to ensure ESG actions are included in their ESG action plan and are encouraged to select ESG goals on ESG actions in their appraisal process.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 17	CORE	OO 21	N/A	PUBLIC	Monitoring	1

**What proportion of your real estate assets has obtained a green or sustainable building certification?**

- (A) All of our real estate assets have obtained a green or sustainable building certification
- (B) A majority of our real estate assets have obtained a green or sustainable building certification
- (C) A minority of our real estate assets have obtained a green or sustainable building certification
- (D) None of our real estate assets have obtained a green or sustainable building certification

## STAKEHOLDER ENGAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 18	CORE	OO 21	N/A	PUBLIC	Stakeholder engagement	1, 2

**How does your third-party property manager(s) engage with tenants?**

- (A) They engage with real estate tenants on energy, water consumption and/or waste production
  - Select from dropdown list:
    - (1) for all of our buildings or properties
    - (2) for a majority of our buildings or properties
    - (3) for a minority of our buildings or properties

**(B) They engage with real estate tenants by organising tenant events focused on increasing sustainability awareness, ESG training and guidance**

Select from dropdown list:

- (1) for all of our buildings or properties
- (2) for a majority of our buildings or properties
- (3) for a minority of our buildings or properties

**(C) They engage with real estate tenants by offering green leases**

Select from dropdown list:

- (1) for all of our buildings or properties
- (2) for a majority of our buildings or properties
- (3) for a minority of our buildings or properties

**(D) They engage with real estate tenants by identifying collaboration opportunities that support targets related to material ESG factors**

Select from dropdown list:

- (1) for all of our buildings or properties
- (2) for a majority of our buildings or properties
- (3) for a minority of our buildings or properties

**(E) They engage with real estate tenants by offering shared financial benefits from equipment upgrades**

Select from dropdown list:

- (1) for all of our buildings or properties
- (2) for a majority of our buildings or properties
- (3) for a minority of our buildings or properties

**(F) Other**

- (G) Our third-party property manager(s) do not engage with tenants

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 19	PLUS	OO 21	N/A	PUBLIC	Stakeholder engagement	1, 2

**During the reporting year, how did you or the organisations operating on your behalf engage with the local community above and beyond what is required by relevant regulations for asset design, use and/or repurposing?**

- We shared our firm's high level commitment to responsible investment (e.g. that we are a PRI signatory)
- We shared a description of what industry and asset class standards our firm aligns with (e.g. TCFD, GRESB)
- We shared our firm's responsible investment policy (at minimum, a summary of key aspects and firm-specific approach)
- We share our firm's ESG risk assessment methodology (topics covered, in-house and/or with external support)
- We shared the outcome of our latest ESG risk assessment on the property(s)
- We shared key ESG performance data on the property(s) being sold.
- We mandate the use of the 'Considerate Constructors Scheme' on developments.
- Assets which have a potential for social impact, we engage with local partners such as charities and NGOs to provide support with fundraising or providing space at affordable levels.

## EXIT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 20	CORE	OO 21	N/A	PUBLIC	Exit	4, 6

**During the reporting year, what responsible investment information was shared with potential buyers of real estate investments?**

**(A) Our firm's high-level commitment to responsible investment, e.g. that we are a PRI signatory**

Select from dropdown list:

- (1) for all of our real estate investments**
- (2) for a majority of our real estate investments
- (3) for a minority of our real estate investments

**(B) A description of what industry and asset class standards our firm aligns with, e.g. TCFD or GRESB**

Select from dropdown list:

- (1) for all of our real estate investments**
- (2) for a majority of our real estate investments
- (3) for a minority of our real estate investments

**(C) Our firm's responsible investment policy (at minimum, a summary of key aspects and firm-specific approach)**

Select from dropdown list:

- (1) for all of our real estate investments**
- (2) for a majority of our real estate investments
- (3) for a minority of our real estate investments

**(D) Our firm's ESG risk assessment methodology (topics covered in-house and/or with external support)**

Select from dropdown list:

- (1) for all of our real estate investments**
- (2) for a majority of our real estate investments
- (3) for a minority of our real estate investments

**(E) The outcome of our latest ESG risk assessment of the property(s)**

Select from dropdown list:

- (1) for all of our real estate investments**
- (2) for a majority of our real estate investments
- (3) for a minority of our real estate investments

**(F) Key ESG performance data on the property(s) being sold**

Select from dropdown list:

- (1) for all of our real estate investments**
- (2) for a majority of our real estate investments
- (3) for a minority of our real estate investments

**(G) Other**

(H) No responsible investment information was shared with potential buyers of real estate investments during the reporting year

(I) Not applicable; we had no sales process (or control over the sales process) during the reporting year

## DISCLOSURE OF ESG PORTFOLIO INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 21	CORE	OO 21	N/A	PUBLIC	Disclosure of ESG portfolio information	6

During the reporting year, how did you report on your targets on material ESG factors and related data to your investors?

- (A) We reported through a publicly disclosed sustainability report
- (B) We reported in aggregate through formal reporting to investors
- (C) We reported at the property level through formal reporting to investors
- (D) We reported through a limited partners advisory committee (or equivalent)
- (E) We reported at digital or physical events or meetings with investors
- (F) We had a process in place to ensure that serious ESG incidents were reported
- (G) Other
- (H) We did not report our targets on material ESG factors and related data to our investors during the reporting year

# INFRASTRUCTURE (INF)

## POLICY

### INVESTMENT GUIDELINES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 1	CORE	OO 21, OO 29, OO 30	N/A	PUBLIC	Investment guidelines	1 to 6

What infrastructure-specific ESG guidelines are currently covered in your organisation's responsible investment policy(ies)?

- (A) Guidelines on our ESG approach tailored to each infrastructure sector and geography where we invest
- (B) Guidelines on our ESG approach to greenfield investments
- (C) Guidelines on our ESG approach to brownfield investments
- (D) Guidelines on pre-investment screening
- (E) Guidelines on our approach to ESG integration into short-term or 100-day plans (or equivalent)
- (F) Guidelines on our approach to ESG integration into long-term value-creation efforts
- (G) Guidelines on our approach to ESG reporting
- (H) Guidelines on our engagement approach related to the workforce
- (I) Guidelines on our engagement approach related to third-party operators
- (J) Guidelines on our engagement approach related to contractors
- (K) Guidelines on our engagement approach related to other external stakeholders, e.g. governments, local communities, and end-users
- (L) Our responsible investment policy(ies) does not cover infrastructure-specific ESG guidelines

## FUNDRAISING

### COMMITMENTS TO INVESTORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 2	CORE	OO 21	N/A	PUBLIC	Commitments to investors	1, 4

For all of the funds that you closed during the reporting year, what type of formal responsible investment commitments did you make in Limited Partnership Agreements (LPAs), side letters, or other constitutive fund documents?

- (A) We incorporated responsible investment commitments in LPAs (or equivalent) as a standard default procedure
- (B) We added responsible investment commitments in LPAs (or equivalent) upon a client's request
- (C) We added responsible investment commitments in side letters upon a client's request
- (D) We did not make any formal responsible investment commitments for the relevant reporting year
- (E) Not applicable; we have not raised funds in the last five years

## PRE-INVESTMENT

### MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 3	CORE	OO 21	INF 3.1	PUBLIC	Materiality analysis	1

During the reporting year, how did you conduct ESG materiality analysis for your potential infrastructure investments?

- (A) We assessed ESG materiality at the asset level, as each case is unique
  - Select from dropdown list
    - (1) for all of our potential infrastructure investments
      - (2) for a majority of our potential infrastructure investments
      - (3) for a minority of our potential infrastructure investments
    - (B) We performed a mix of industry-level and asset-level ESG materiality analyses
    - (C) We assessed ESG materiality at the industry level only
    - (D) We did not conduct ESG materiality analysis for our potential infrastructure investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 3.1	CORE	INF 3	N/A	PUBLIC	Materiality analysis	1

During the reporting year, what tools, standards and data did you use in your ESG materiality analysis of potential infrastructure investments?

- (A) We used GRI standards to inform our infrastructure ESG materiality analysis
- (B) We used SASB standards to inform our infrastructure ESG materiality analysis
- (C) We used the UN Sustainable Development Goals (SDGs) to inform our infrastructure ESG materiality analysis
- (D) We used the GRESB Materiality Assessment (RC7) or similar to inform our infrastructure ESG materiality analysis
- (E) We used the environmental and social factors detailed in the IFC Performance Standards (or similar standards used by development finance institutions) in our infrastructure ESG materiality analysis
- (F) We used climate disclosures, such as the TCFD recommendations or other climate risk and/or exposure analysis tools, to inform our infrastructure ESG materiality analysis
- (G) We used the UN Guiding Principles on Business and Human Rights (UNGPs) to inform our infrastructure ESG materiality analysis
- (H) We used geopolitical and macro-economic considerations in our infrastructure ESG materiality analysis
- (I) We engaged with existing owners and/or managers (or developers for new infrastructure assets) to inform our infrastructure ESG materiality analysis
- (J) Other

## DUE DILIGENCE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 4	CORE	OO 21	N/A	PUBLIC	Due diligence	1

During the reporting year, how did material ESG factors influence the selection of your infrastructure investments?

(A) Material ESG factors were used to identify risks

Select from dropdown list

- (1) for all of our potential infrastructure investments
- (2) for a majority of our potential infrastructure investments
- (3) for a minority of our potential infrastructure investments

(B) Material ESG factors were discussed by the investment committee (or equivalent)

Select from dropdown list

- (1) for all of our potential infrastructure investments
- (2) for a majority of our potential infrastructure investments
- (3) for a minority of our potential infrastructure investments

(C) Material ESG factors were used to identify remedial actions for our 100-day plans (or equivalent)

(D) Material ESG factors were used to identify opportunities for value creation

Select from dropdown list

- (1) for all of our potential infrastructure investments
- (2) for a majority of our potential infrastructure investments
- (3) for a minority of our potential infrastructure investments

(E) Material ESG factors informed our decision to abandon potential investments in the due diligence phase in cases where ESG risks were considered too high to mitigate

Select from dropdown list

- (1) for all of our potential infrastructure investments
- (2) for a majority of our potential infrastructure investments
- (3) for a minority of our potential infrastructure investments

(F) Material ESG factors impacted investments in terms of the price offered and/or paid

Select from dropdown list

- (1) for all of our potential infrastructure investments
- (2) for a majority of our potential infrastructure investments
- (3) for a minority of our potential infrastructure investments

(G) Material ESG factors did not influence the selection of our infrastructure investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 5	CORE	OO 21	N/A	PUBLIC	Due diligence	1

Once material ESG factors have been identified, what processes do you use to conduct due diligence on these factors for potential infrastructure investments?

(A) We conduct a high-level or desktop review against an ESG checklist for initial red flags

Select from dropdown list

- (1) for all of our potential infrastructure investments
- (2) for a majority of our potential infrastructure investments
- (3) for a minority of our potential infrastructure investments

(B) We send detailed ESG questionnaires to target assets

Select from dropdown list

- (1) for all of our potential infrastructure investments

- (2) for a majority of our potential infrastructure investments
- (3) for a minority of our potential infrastructure investments
- (C) We hire third-party consultants to do technical due diligence on specific material ESG factors
  - Select from dropdown list
  - (1) for all of our potential infrastructure investments
  - (2) for a majority of our potential infrastructure investments
  - (3) for a minority of our potential infrastructure investments
- (D) We conduct site visits
  - Select from dropdown list
  - (1) for all of our potential infrastructure investments
  - (2) for a majority of our potential infrastructure investments
  - (3) for a minority of our potential infrastructure investments
- (E) We conduct in-depth interviews with management and/or personnel
  - Select from dropdown list
  - (1) for all of our potential infrastructure investments
  - (2) for a majority of our potential infrastructure investments
  - (3) for a minority of our potential infrastructure investments
- (F) We conduct detailed external stakeholder analyses and/or engagement
- (G) We incorporate ESG due diligence findings in all of our relevant investment process documentation in the same manner as other key due diligence, e.g. commercial, accounting and legal
  - Select from dropdown list
  - (1) for all of our potential infrastructure investments
  - (2) for a majority of our potential infrastructure investments
  - (3) for a minority of our potential infrastructure investments
- (H) Our investment committee (or an equivalent decision-making body) is ultimately responsible for ensuring all ESG due diligence is completed in the same manner as for other key due diligence, e.g. commercial, accounting and legal
  - Select from dropdown list
  - (1) for all of our potential infrastructure investments
  - (2) for a majority of our potential infrastructure investments
  - (3) for a minority of our potential infrastructure investments
- (I) Other
- (J) We do not conduct due diligence on material ESG factors for potential infrastructure investments

## SELECTION, APPOINTMENT AND MONITORING OF THIRD-PARTY OPERATORS

### SELECTION PROCESS OF THIRD-PARTY OPERATORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 6	CORE	OO 30	N/A	PUBLIC	Selection process of third-party operators	1, 4

During the reporting year, how did you include material ESG factors in all of your selections of third-party operators?

- (A) We requested information from potential third-party operators on their overall approach to material ESG factors
- (B) We requested track records and examples from potential third-party operators on how they manage material ESG factors
- (C) We requested information from potential third-party operators on their engagement process(es) with stakeholders
- (D) We requested documentation from potential third-party operators on their responsible procurement and/or contractor practices, including responsibilities, approach, and incentives
- (E) Other
- (F) We did not include material ESG factors in our selection of third-party operators

## APPOINTMENT PROCESS OF THIRD-PARTY OPERATORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 7	CORE	OO 30	N/A	PUBLIC	Appointment process of third-party operators	1, 4

How did you include material ESG factors when appointing your current third-party operators?

(A) We set clear and detailed expectations for incorporating material ESG factors into all relevant elements of infrastructure asset management

Select from dropdown list

- (1) for all of our third-party operators
- (2) for a majority of our third-party operators
- (3) for a minority of our third-party operators

(B) We set clear ESG reporting requirements

Select from dropdown list

- (1) for all of our third-party operators
- (2) for a majority of our third-party operators
- (3) for a minority of our third-party operators

(C) We set clear targets for material ESG factors

Select from dropdown list

- (1) for all of our third-party operators
- (2) for a majority of our third-party operators
- (3) for a minority of our third-party operators

(D) We set incentives related to targets on material ESG factors

Select from dropdown list

- (1) for all of our third-party operators
- (2) for a majority of our third-party operators
- (3) for a minority of our third-party operators

(E) Other

(F) We did not include material ESG factors when appointing third-party operators

## MONITORING PROCESS OF THIRD-PARTY OPERATORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 8	CORE	OO 30	N/A	PUBLIC	Monitoring process of third-party operators	1, 4

How do you include material ESG factors when monitoring current third-party operators?

(A) We monitor the performance of quantitative and/or qualitative targets on material environmental factors

Select from dropdown list

- (1) for all of our third-party operators
- (2) for a majority of our third-party operators
- (3) for a minority of our third-party operators

(B) We monitor the performance of quantitative and/or qualitative targets on material social factors

Select from dropdown list

- (1) for all of our third-party operators
- (2) for a majority of our third-party operators

- (3) for a minority of our third-party operators
- (C) We monitor the performance of quantitative and/or qualitative targets on material governance factors**  
Select from dropdown list
  - (1) for all of our third-party operators**
  - (2) for a majority of our third-party operators
  - (3) for a minority of our third-party operators
- (D) We require formal reporting at least yearly**  
Select from dropdown list
  - (1) for all of our third-party operators**
  - (2) for a majority of our third-party operators
  - (3) for a minority of our third-party operators
- (E) We have discussions about material ESG factors with all relevant stakeholders at least yearly**  
Select from dropdown list
  - (1) for all of our third-party operators**
  - (2) for a majority of our third-party operators
  - (3) for a minority of our third-party operators
- (F) We conduct a performance review of third-party operators against targets on material ESG factors and/or a financial incentive structure linked to material ESG factors
- (G) We have internal or external parties conduct site visits at least yearly**  
Select from dropdown list
  - (1) for all of our third-party operators
  - (2) for a majority of our third-party operators**
  - (3) for a minority of our third-party operators
- (H) Other
  - (I) We do not include material ESG factors in the monitoring of third-party operators

## POST-INVESTMENT

### MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 9	CORE	OO 21	INF 9.1	PUBLIC	Monitoring	1

During the reporting year, did you track one or more KPIs on material ESG factors across your infrastructure investments?

- (A) Yes, we tracked KPIs on environmental factors**  
Percentage of infrastructure assets this applies to:
  - (1) >0 to 10%
  - (2) >10 to 50%
  - (3) >50 to 75%
  - (4) >75 to 95%
  - (5) >95%**
- (B) Yes, we tracked KPIs on social factors**  
Percentage of infrastructure assets this applies to:
  - (1) >0 to 10%
  - (2) >10 to 50%
  - (3) >50 to 75%
  - (4) >75 to 95%
  - (5) >95%**
- (C) Yes, we tracked KPIs on governance factors**  
Percentage of infrastructure assets this applies to:
  - (1) >0 to 10%
  - (2) >10 to 50%
  - (3) >50 to 75%
  - (4) >75 to 95%
  - (5) >95%**

- (D) We did not track KPIs on material ESG factors across our infrastructure investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 9.1	PLUS	INF 9	N/A	PUBLIC	Monitoring	1

**Provide examples of KPIs on material ESG factors you tracked across your infrastructure investments during the reporting year.**

(A) ESG KPI #1

% waste recycled

(B) ESG KPI #2

GHG emissions

(C) ESG KPI #3

Volume of water consumption

(D) ESG KPI #4

Health & safety incidents

(E) ESG KPI #5

Fatalities

(F) ESG KPI #6

Gender pay gap

(G) ESG KPI #7

Gender Diversity

(H) ESG KPI #8

ESG incidents

(I) ESG KPI #9

Anti-bribery and Corruption policies

(J) ESG KPI #10

Human Rights policies

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 10	CORE	OO 21, OO 30	INF 10.1	PUBLIC	Monitoring	1, 2

**What processes do you have in place to support meeting your targets on material ESG factors for your infrastructure investments?**

**(A) We use operational-level benchmarks to assess and analyse the performance of assets against sector performance**

Select from dropdown list

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

- (B) We implement international best practice standards such as the IFC Performance Standards to guide ongoing assessments and analyses**
  - Select from dropdown list
    - (1) for all of our infrastructure investments**
    - (2) for a majority of our infrastructure investments
    - (3) for a minority of our infrastructure investments
- (C) We implement certified environmental and social management systems across our portfolio**
  - Select from dropdown list
    - (1) for all of our infrastructure investments
    - (2) for a majority of our infrastructure investments**
    - (3) for a minority of our infrastructure investments
- (D) We make sufficient budget available to ensure that the systems and procedures needed are established**
  - Select from dropdown list
    - (1) for all of our infrastructure investments**
    - (2) for a majority of our infrastructure investments
    - (3) for a minority of our infrastructure investments
- (E) We hire external verification services to audit performance, systems, and procedures
- (F) We collaborate and engage with our third-party operators to develop action plans**
  - Select from dropdown list
    - (1) for all of our infrastructure investments**
    - (2) for a majority of our infrastructure investments
    - (3) for a minority of our infrastructure investments
- (G) We develop minimum health and safety standards**
  - Select from dropdown list
    - (1) for all of our infrastructure investments**
    - (2) for a majority of our infrastructure investments
    - (3) for a minority of our infrastructure investments
- (H) We conduct ongoing engagement with all key stakeholders, e.g. local communities, NGOs, governments, and end-users**
  - Select from dropdown list
    - (1) for all of our infrastructure investments
    - (2) for a majority of our infrastructure investments**
    - (3) for a minority of our infrastructure investments
- (I) Other
- (J) We do not have processes in place to help meet our targets on material ESG factors for our infrastructure investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 10.1	PLUS	INF 10	N/A	PUBLIC	Monitoring	1, 2

**Describe up to two processes you put in place during the reporting year to support meeting your targets on material ESG factors.**

(A) Process one

We improved our asset level reporting capability

(B) Process two

We shared asset level reports with our investee companies to encourage better data provision and performance improvement

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 11	CORE	OO 21	N/A	PUBLIC	Monitoring	1, 2

**Post-investment, how do you manage material ESG risks and ESG opportunities to create value during the holding period of your investments?**

**(A) We develop asset-specific ESG action plans based on pre-investment research, due diligence and materiality findings**

Select from dropdown list

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

**(B) We adjust our ESG action plans based on performance monitoring findings at least yearly**

Select from dropdown list

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

**(C) We, or the external advisors that we hire, support our infrastructure investments with specific ESG value-creation opportunities**

Select from dropdown list

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

**(D) Other**

Specify:

We provide our investee companies with ESG reports summarising their performance on an annual basis

Select from dropdown list

- (1) for all of our infrastructure investments
- (2) for a majority of our infrastructure investments**
- (3) for a minority of our infrastructure investments
- (E) We do not manage material ESG risks and opportunities post-investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 12	PLUS	OO 21	N/A	PUBLIC	Monitoring	1, 2

**Describe how you ensure that material ESG risks are adequately addressed in the infrastructure investments where you hold a minority stake.**

For the majority of our investments we have direct representation on the Investee board company with voting right protections.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 13	PLUS	OO 21	N/A	PUBLIC	Monitoring	2

**Describe how your ESG action plans are defined, implemented and monitored throughout the investment period.**

We have direct representation on our investee boards, ESG is a standing agenda item for most of our assets and guidance is provided to Directors for managing, monitoring and reporting ESG risks and opportunities. In addition we have implemented annual sustainability reporting which includes SFDR mandatory PAI's and TCFD.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 14	CORE	OO 21	INF 14.1	PUBLIC	Monitoring	1, 2

**How do you ensure that adequate ESG-related competence exists at the asset level?**

- (A) We assign our board responsibility for ESG matters**  
Select from dropdown list
  - (1) for all of our infrastructure investments**
  - (2) for a majority of our infrastructure investments
  - (3) for a minority of our infrastructure investments
- (B) We ensure that material ESG matters are discussed by our board at least yearly**  
Select from dropdown list
  - (1) for all of our infrastructure investments**
  - (2) for a majority of our infrastructure investments
  - (3) for a minority of our infrastructure investments
- (C) We provide training on ESG aspects and management best practices relevant to the asset to C-suite executives only**  
Select from dropdown list
  - (1) for all of our infrastructure investments
  - (2) for a majority of our infrastructure investments
  - (3) for a minority of our infrastructure investments**
- (D) We provide training on ESG aspects and management best practices relevant to the asset to employees (excl. C-suite executives)**  
Select from dropdown list
  - (1) for all of our infrastructure investments
  - (2) for a majority of our infrastructure investments
  - (3) for a minority of our infrastructure investments**
- (E) We support the asset by finding external ESG expertise, e.g. consultants or auditors**  
Select from dropdown list
  - (1) for all of our infrastructure investments
  - (2) for a majority of our infrastructure investments**
  - (3) for a minority of our infrastructure investments
- (F) We share best practices across assets, e.g. educational sessions and the implementation of environmental and social management systems**  
Select from dropdown list
  - (1) for all of our infrastructure investments**
  - (2) for a majority of our infrastructure investments
  - (3) for a minority of our infrastructure investments
- (G) We apply penalties or incentives to improve ESG performance in management remuneration schemes
- (H) Other
- (I) We do not ensure that adequate ESG-related competence exists at the asset level

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 14.1	PLUS	INF 14	N/A	PUBLIC	Monitoring	1, 2

**Describe up to two initiatives adopted as part of your ESG competence-building efforts at the asset level during the reporting year.**

(A) Initiative one

Data collection across a range of Environmental, Social and Governance factors.

(B) Initiative two

Sustainability reporting for the majority of our underlying assets.

## STAKEHOLDER ENGAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 15	PLUS	OO 21	N/A	PUBLIC	Stakeholder engagement	1, 2

**How do you ensure that appropriate stakeholder engagement is carried out during both due diligence for potential investments and the ongoing monitoring of existing investments?**

Engagement with stakeholders is part of our ESG due diligence scope for potential investments. For existing investments guidance to SPV/Investee Company directors are to include ESG on the agenda for all Board meetings. Contracts include regular meetings with clients and subcontractors.

## EXIT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 16	CORE	OO 21	N/A	PUBLIC	Exit	4, 6

**During the reporting year, what responsible investment information was shared with potential buyers of infrastructure investments?**

- (A) Our firm's high-level commitment to responsible investment, e.g. that we are a PRI signatory**  
Select from dropdown list
  - (1) for all of our infrastructure investments**
  - (2) for a majority of our infrastructure investments
  - (3) for a minority of our infrastructure investments
- (B) A description of what industry and asset class standards our firm aligns with, e.g. TCFD or GRESB**  
Select from dropdown list
  - (1) for all of our infrastructure investments**
  - (2) for a majority of our infrastructure investments
  - (3) for a minority of our infrastructure investments
- (C) Our firm's responsible investment policy (at minimum, a summary of key aspects and firm-specific approach)**  
Select from dropdown list
  - (1) for all of our infrastructure investments
  - (2) for a majority of our infrastructure investments**
  - (3) for a minority of our infrastructure investments

- (D) Our firm's ESG risk assessment methodology (topics covered in-house and/or with external support)
- (E) The outcome of our latest ESG risk assessment on the asset or portfolio company
- (F) Key ESG performance data on the asset or portfolio company being sold**
  - Select from dropdown list
    - (1) for all of our infrastructure investments**
      - (2) for a majority of our infrastructure investments
      - (3) for a minority of our infrastructure investments
- (G) Other
  - (H) No responsible investment information was shared with potential buyers of infrastructure investments during the reporting year
  - (I) Not applicable; we had no sales process (or control over the sales process) during the reporting year

## DISCLOSURE OF ESG PORTFOLIO INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 17	CORE	OO 21	N/A	PUBLIC	Disclosure of ESG portfolio information	6

During the reporting year, how did you report your targets on material ESG factors and related data to your investors?

- (A) We reported through a publicly-disclosed sustainability report
- (B) We reported in aggregate through formal reporting to investors**
- (C) We reported at the asset level through formal reporting to investors**
- (D) We reported through a limited partners advisory committee (or equivalent)**
- (E) We reported at digital or physical events or meetings with investors**
- (F) We had a process in place to ensure that reporting on serious ESG incidents occurred**
- (G) Other
  - (H) We did not report our targets on material ESG factors and related data to our investors during the reporting year

# 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 AUDIT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 4	CORE	OO 21, CBM 1	N/A	PUBLIC	Internal audit	6

#### What responsible investment processes and/or data were audited through your internal audit function?

- (A) Policy, governance and strategy
  - Select from dropdown list:
    - (1) Data internally audited
    - (2) Processes internally audited
    - (3) Processes and data internally audited
- (B) Manager selection, appointment and monitoring
- (C) Listed equity
  - Select from dropdown list:
    - (1) Data internally audited
    - (2) Processes internally audited
    - (3) Processes and data internally audited
- (D) Fixed income
  - Select from dropdown list:

- (1) Data internally audited
- (2) Processes internally audited
- (3) Processes and data internally audited
- (F) Real estate
- (G) Infrastructure

## 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
- (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