




| Gateway | | Discretionary | Reason for interaction |
|--------------------|--|------------------------------|--|
| Type of engagement | Individual/ internal staff engagements | Collaborative engagements | <input checked="" type="checkbox"/> To support investment decisionmaking in & company related ESG issues <input checked="" type="checkbox"/> To enhance corporate practice or identify the need to enhance corporate practice <input checked="" type="checkbox"/> To engage internal ESG decision <input type="checkbox"/> Other: specify |
| Type of engagement | Individual/ internal staff engagements | Service provider engagements | <input checked="" type="checkbox"/> To support investment decisionmaking in & company related ESG issues <input checked="" type="checkbox"/> To enhance corporate practice or identify the need to enhance corporate practice <input type="checkbox"/> Other: specify |

RI TRANSPARENCY REPORT

2020

Northern Ireland Local Government Officers' Superannuation Committee

About this report

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

This report is an export of the individual Signatory organisation's response to the PRI during the reporting period specified above. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information.

PRI disclaimer

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

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| | | | |
|-------|-----------|-----------------|---------|
| OO 01 | Mandatory | Gateway/Peering | General |
|-------|-----------|-----------------|---------|

OO 01.1 Select the type that best describes your organisation or the services you provide.

- Non-corporate pension or superannuation or retirement or provident fund or plan
- Corporate pension or superannuation or retirement or provident fund or plan
- Insurance company
- Foundation
- Endowment
- Development finance institution
- Reserve - sovereign or government controlled fund
- Family office
- Other, specify

OO 01.3 Additional information. [Optional]

The Northern Ireland Local Government Officers' Superannuation Committee (NILGOSC) was established by the Government in April 1950 to operate a pension scheme for the local councils and other similar bodies in Northern Ireland. The pension scheme is a defined benefit pension scheme. NILGOSC is the corporate body responsible for the administration of the Scheme and is a non-departmental public body, sponsored by the Department for Communities (Northern Ireland Executive).

| | | | |
|-------|-----------|---------|---------|
| OO 02 | Mandatory | Peering | General |
|-------|-----------|---------|---------|

OO 02.1 Select the location of your organisation's headquarters.

United Kingdom

OO 02.2 Indicate the number of countries in which you have offices (including your headquarters).

- 1
- 2-5
- 6-10
- >10

OO 02.3 Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).

77

| | | | |
|-------|-----------|-------------|---------|
| OO 03 | Mandatory | Descriptive | General |
|-------|-----------|-------------|---------|

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

- Yes
- No

| | | | |
|-------|-----------|-----------------|---------|
| OO 04 | Mandatory | Gateway/Peering | General |
|-------|-----------|-----------------|---------|

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

31/03/2019

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

Total AUM
8,039,948,000 GBP
10385945083 USD

| | | | |
|-------|--|---------|---------|
| OO 05 | Mandatory to Report, Voluntary to Disclose | Gateway | General |
|-------|--|---------|---------|

OO 05.1 Provide an approximate percentage breakdown of your AUM at the end of your reporting year using the following asset classes and investment strategies:

| | Internally managed (%) | Externally managed (%) |
|----------------|------------------------|------------------------|
| Listed equity | 0 | 41 |
| Fixed income | 0 | 38 |
| Private equity | 0 | 0 |
| Property | 0 | 11 |
| Infrastructure | 0 | 3 |
| Commodities | 0 | 0 |
| Hedge funds | 0 | 0 |

| | | |
|--------------------------|---|---|
| Fund of hedge funds | 0 | 0 |
| Forestry | 0 | 0 |
| Farmland | 0 | 0 |
| Inclusive finance | 0 | 0 |
| Cash | 1 | 6 |
| Money market instruments | 0 | 0 |
| Other (1), specify | 0 | 0 |
| Other (2), specify | 0 | 0 |

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|-------|-----------|-------------|---------|
| OO 06 | Mandatory | Descriptive | General |
|-------|-----------|-------------|---------|

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

- as percentage breakdown
- as broad ranges

| | |
|---------|---|
| OO 06.3 | Indicate whether your organisation has any off-balance sheet assets [Optional]. |
|---------|---|

- Yes
- No

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

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

| | |
|---------|--|
| OO 06.6 | Provide contextual information on your AUM asset class split. [Optional] |
|---------|--|

Uncalled commitments to primary funds (e.g Infrastructure) are not held separately to other assets until drawn down and will therefore be reflected in the breakdown of the other asset classes.

| | | | |
|-------|--|---------|---------|
| OO 07 | Mandatory to Report, Voluntary to Disclose | Gateway | General |
|-------|--|---------|---------|

Private

| | | | |
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| OO 08 | Mandatory to Report, Voluntary to Disclose | Peering | General |
|-------|--|---------|---------|

Private

| | | | |
|-------|-----------|---------|---------|
| OO 09 | Mandatory | Peering | General |
|-------|-----------|---------|---------|

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|---------|--|
| OO 09.1 | Indicate the breakdown of your organisation's AUM by market. |
|---------|--|

87.9

Developed Markets

10.2

Emerging Markets

0.5

Frontier Markets

1.4

Other Markets

| | | | |
|-------|-----------|---------|---------|
| OO 10 | Mandatory | Gateway | General |
|-------|-----------|---------|---------|

| | |
|---------|---|
| OO 10.1 | Select the active ownership activities your organisation implemented in the reporting year. |
|---------|---|

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|----------------------------|
| Listed equity – engagement |
|----------------------------|

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

| |
|------------------------|
| Listed equity – voting |
|------------------------|

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

| |
|-------------------------------|
| Fixed income SSA – engagement |
|-------------------------------|

- We engage with SSA bond issuers on ESG factors via our staff, collaborations or service providers.

- We require our external managers to engage with SSA bond issuers on ESG factors on our behalf.
- We do not engage directly and do not require external managers to engage with SSA bond issuers on ESG factors. Please explain why you do not.

Fixed income Corporate (financial) – engagement

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

Fixed income Corporate (non-financial) – engagement

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

Fixed income Corporate (securitised) – engagement

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

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| OO 11 | Mandatory | Gateway | General |
|-------|-----------|---------|---------|

OO 11.1 Select the internally managed asset classes in which you addressed ESG incorporation into your investment decisions and/or your active ownership practices (during the reporting year).

Cash

- We address ESG incorporation.
- We do not do ESG incorporation.

OO 11.2 Select the externally managed assets classes in which you and/or your investment consultants address ESG incorporation in your external manager selection, appointment and/or monitoring processes.

| Asset class | ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes |
|--|--|
| Listed equity | <p style="background-color: #0070C0; color: white; padding: 2px;">Listed equity - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation |
| Fixed income - SSA | <p style="background-color: #0070C0; color: white; padding: 2px;">Fixed income - SSA - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation |
| Fixed income - corporate (financial) | <p style="background-color: #0070C0; color: white; padding: 2px;">Fixed income - corporate (financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation |
| Fixed income - corporate (non-financial) | <p style="background-color: #0070C0; color: white; padding: 2px;">Fixed income - corporate (non-financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation |

| | |
|----------------------------|---|
| Fixed income - securitised | <p>Fixed income - securitised - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation |
| Property | <p>Property - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation |
| Infrastructure | <p>Infrastructure - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation |
| Cash | <p>Cash - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation |

OO 11.3a If your organisation does not integrate ESG factors into investment decisions on your internally managed assets, explain why not.

ESG is not specifically considered for internally managed cash.

OO 11.4 Provide a brief description of how your organisation includes responsible investment considerations in your investment manager selection, appointment and monitoring processes.

Investment Manager appointments are made following an open and transparent procurement process. Responsible investment is one of the criteria in which managers need to demonstrate their capabilities. The details they provide are assessed and 5% of the total marks is awarded to this criteria. Only those managers who demonstrate satisfactory ESG Practices will be considered for appointment.

NILGOSC monitors and evaluates the performance of its investment managers on a quarterly basis. The evaluation process incorporates qualitative as well as quantitative factors and each individual manager is assessed against a range of pre-determined criteria. One of these criteria is the manager's ability to integrate ESG issues into the investment process.

OO 12 **Mandatory** Gateway General

OO 12.1 Below are all applicable modules or sections you may report on. Those which are mandatory to report (asset classes representing 10% or more of your AUM) are already ticked and read-only. Those which are voluntary to report on can be opted into by ticking the box.

| |
|---|
| Core modules |
| <input checked="" type="checkbox"/> Organisational Overview <input checked="" type="checkbox"/> Strategy and Governance |
| RI implementation directly or via service providers |
| Direct - Listed Equity active ownership |
| <input checked="" type="checkbox"/> Engagements <input checked="" type="checkbox"/> (Proxy) voting |
| RI implementation via external managers |
| Indirect - Selection, Appointment and Monitoring of External Managers |
| <input checked="" type="checkbox"/> Listed Equities <input checked="" type="checkbox"/> Fixed income - SSA <input checked="" type="checkbox"/> Fixed income - Corporate (financial) <input checked="" type="checkbox"/> Fixed income - Corporate (non-financial) <input checked="" type="checkbox"/> Fixed income - Securitised <input checked="" type="checkbox"/> Property <input checked="" type="checkbox"/> Infrastructure |
| Closing module |

Closing module

| | | | |
|-----------|--|---------|---------|
| OO SAM 01 | Mandatory to Report, Voluntary to Disclose | Gateway | General |
|-----------|--|---------|---------|

Private

| | | | |
|-----------|--|--|--------|
| OO Checks | | | Checks |
|-----------|--|--|--------|

If there are any messages below, please review them before continuing. If there are no messages below, please save this page and continue.

| SG 01 | Mandatory | Core Assessed | General | | | | |
|---|---|-------------------------|-----------------|---|---|--|--|
| SG 01.1 | Indicate if you have an investment policy that covers your responsible investment approach. | | | | | | |
| <input checked="" type="checkbox"/> Yes | | | | | | | |
| SG 01.2 | Indicate the components/types and coverage of your policy. | | | | | | |
| <table border="1"> <thead> <tr> <th>Policy components/types</th> <th>Coverage by AUM</th> </tr> </thead> <tbody> <tr> <td> <input checked="" type="checkbox"/> Policy setting out your overall approach <input checked="" type="checkbox"/> Formalised guidelines on environmental factors <input checked="" type="checkbox"/> Formalised guidelines on social factors <input checked="" type="checkbox"/> Formalised guidelines on corporate governance factors <input checked="" type="checkbox"/> Fiduciary (or equivalent) duties <input checked="" type="checkbox"/> Asset class-specific RI guidelines <input type="checkbox"/> Sector specific RI guidelines <input type="checkbox"/> Screening / exclusions policy <input type="checkbox"/> Other, specify (1) <input type="checkbox"/> Other, specify(2) </td> <td> <input checked="" type="checkbox"/> Applicable policies cover all AUM <input type="checkbox"/> Applicable policies cover a majority of AUM <input type="checkbox"/> Applicable policies cover a minority of AUM </td> </tr> </tbody> </table> | | Policy components/types | Coverage by AUM | <input checked="" type="checkbox"/> Policy setting out your overall approach <input checked="" type="checkbox"/> Formalised guidelines on environmental factors <input checked="" type="checkbox"/> Formalised guidelines on social factors <input checked="" type="checkbox"/> Formalised guidelines on corporate governance factors <input checked="" type="checkbox"/> Fiduciary (or equivalent) duties <input checked="" type="checkbox"/> Asset class-specific RI guidelines <input type="checkbox"/> Sector specific RI guidelines <input type="checkbox"/> Screening / exclusions policy <input type="checkbox"/> Other, specify (1) <input type="checkbox"/> Other, specify(2) | <input checked="" type="checkbox"/> Applicable policies cover all AUM <input type="checkbox"/> Applicable policies cover a majority of AUM <input type="checkbox"/> Applicable policies cover a minority of AUM | | |
| Policy components/types | Coverage by AUM | | | | | | |
| <input checked="" type="checkbox"/> Policy setting out your overall approach <input checked="" type="checkbox"/> Formalised guidelines on environmental factors <input checked="" type="checkbox"/> Formalised guidelines on social factors <input checked="" type="checkbox"/> Formalised guidelines on corporate governance factors <input checked="" type="checkbox"/> Fiduciary (or equivalent) duties <input checked="" type="checkbox"/> Asset class-specific RI guidelines <input type="checkbox"/> Sector specific RI guidelines <input type="checkbox"/> Screening / exclusions policy <input type="checkbox"/> Other, specify (1) <input type="checkbox"/> Other, specify(2) | <input checked="" type="checkbox"/> Applicable policies cover all AUM <input type="checkbox"/> Applicable policies cover a majority of AUM <input type="checkbox"/> Applicable policies cover a minority of AUM | | | | | | |
| SG 01.3 | Indicate if the investment policy covers any of the following | | | | | | |
| <input checked="" type="checkbox"/> Your organisation's definition of ESG and/or responsible investment and it's relation to investments <input type="checkbox"/> Your investment objectives that take ESG factors/real economy influence into account <input type="checkbox"/> Time horizon of your investment <input type="checkbox"/> Governance structure of organisational ESG responsibilities <input checked="" type="checkbox"/> ESG incorporation approaches <input checked="" type="checkbox"/> Active ownership approaches <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Climate change <input type="checkbox"/> Understanding and incorporating client / beneficiary sustainability preferences <input type="checkbox"/> Other RI considerations, specify (1) <input type="checkbox"/> Other RI considerations, specify (2) | | | | | | | |
| SG 01.4 | Describe your organisation's investment principles and overall investment strategy, interpretation of fiduciary (or equivalent) duties, and how they consider ESG factors and real economy impact. | | | | | | |
| <p>NILGOSC's Statement of investment principles is available on the NILGOSC website at: https://www.nilgosc.org.uk/DataEditorUploads/Investment/NILGOSC%20SIP%20Feb%202018.pdf</p> <p>NILGOSC delegates the selection of investments held to its fund managers and does not impose any investment restrictions in regard of social, ethical and environmental issues. NILGOSC does not make any investments specifically for social, ethical and environmental reasons.</p> <p>NILGOSC has instructed its active fund managers to take account of ESG considerations provided the primary financial obligation is not compromised. Managers are instructed to give due regard to ESG considerations by integrating social environmental and ethical consideration into their assessment of risks, investment opportunities and reporting.</p> | | | | | | | |
| SG 01.5 | Provide a brief description of the key elements, any variations or exceptions to your investment policy that covers your responsible investment approach. [Optional] | | | | | | |
| <p>NILGOSC's overriding obligation is to act in the best interests of the Fund beneficiaries. In this fiduciary role NILGOSC believes that environmental, social and corporate governance (ESG) issues can affect the financial performance of investments. Accordingly, NILGOSC believes that these factors should be taken into account when managing the Fund's assets, subject to the overriding fiduciary duty to maximise the financial return on investments.</p> | | | | | | | |
| <input type="checkbox"/> No | | | | | | | |

| | | | |
|----------|--|-------------|---------|
| SG 01 CC | Mandatory to Report, Voluntary to Disclose | Descriptive | General |
| Private | | | |

| | | | |
|--|--|---|-------|
| SG 02 | Mandatory | Core Assessed | PRI 6 |
| SG 02.1 | Indicate which of your investment policy documents (if any) are publicly available. Provide a URL and an attachment of the document. | | |
| <input checked="" type="checkbox"/> Policy setting out your overall approach | | | |
| | | URL/Attachment | |
| <input checked="" type="checkbox"/> URL https://www.nilgosc.org.uk/DataEditorUploads/Investment/NILGOSC%20SIP%20Feb%202018.pdf | | <input type="checkbox"/> Attachment (will be made public) | |
| <input checked="" type="checkbox"/> Formalised guidelines on environmental factors | | | |
| | | URL/Attachment | |
| <input checked="" type="checkbox"/> URL https://www.nilgosc.org.uk/DataEditorUploads/Climate%20Risk%20Statement-Final%20221119.pdf | | | |

- Attachment (will be made public)
- Formalised guidelines on social factors

| | URL/Attachment |
|---|---|
| <input checked="" type="checkbox"/> URL | http://www.nilgosc.org.uk/DataEditorUploads/Committee/Handbook/Statement%20of%20Responsible%20Investment%20Apr%2017%20final.pdf |
| <input type="checkbox"/> Attachment (will be made public) | |
- Formalised guidelines on corporate governance factors

| | URL/Attachment |
|---|---|
| <input checked="" type="checkbox"/> URL | http://www.nilgosc.org.uk/DataEditorUploads/Committee/Handbook/Statement%20of%20Responsible%20Investment%20Apr%2017%20final.pdf |
| <input type="checkbox"/> Attachment (will be made public) | |
- Fiduciary (or equivalent) duties

| | URL/Attachment |
|---|---|
| <input checked="" type="checkbox"/> URL | http://www.nilgosc.org.uk/DataEditorUploads/Committee/Handbook/Statement%20of%20Responsible%20Investment%20Apr%2017%20final.pdf |
| <input type="checkbox"/> Attachment (will be made public) | |
- Asset class-specific RI guidelines

| | URL/Attachment |
|---|---|
| <input checked="" type="checkbox"/> URL | http://www.nilgosc.org.uk/DataEditorUploads/Committee/Handbook/Statement%20of%20Responsible%20Investment%20Apr%2017%20final.pdf |
| <input type="checkbox"/> Attachment (will be made public) | |
- Engagement policy

| | URL/Attachment |
|---|---|
| <input checked="" type="checkbox"/> URL | https://www.nilgosc.org.uk/DataEditorUploads/Pension%20Fund/Stewardship%20Code%20Statement%20July%202017.pdf |
| <input type="checkbox"/> Attachment (will be made public) | |
- (Proxy) voting policy

| | URL/Attachment |
|---|---|
| <input checked="" type="checkbox"/> URL | https://www.nilgosc.org.uk/voting-policies-and-activity |
| <input type="checkbox"/> Attachment (will be made public) | |
- We do not publicly disclose our investment policy documents

| SG 02.2 | Indicate if any of your investment policy components are publicly available. Provide URL and an attachment of the document. |
|---------|---|
|---------|---|

- Your organisation's definition of ESG and/or responsible investment and it's relation to investments

| | URL/Attachment |
|---|---|
| <input checked="" type="checkbox"/> URL | http://www.nilgosc.org.uk/responsible-investment-and-esg |
| <input type="checkbox"/> Attachment | |
- ESG incorporation approaches

| | URL/Attachment |
|---|---|
| <input checked="" type="checkbox"/> URL | http://www.nilgosc.org.uk/DataEditorUploads/Committee/Handbook/Statement%20of%20Responsible%20Investment%20Apr%2017%20final.pdf |
| <input type="checkbox"/> Attachment | |
- Active ownership approaches

| | URL/Attachment |
|---|---|
| <input checked="" type="checkbox"/> URL | http://www.nilgosc.org.uk/DataEditorUploads/Pension%20Fund/Stewardship%20Code%20Statement%20July%202017.pdf |
| <input type="checkbox"/> Attachment | |
- Reporting

| | |
|---|---|
| URL/Attachment | |
| <input checked="" type="checkbox"/> URL | http://www.nilgosc.org.uk/DataEditorUploads/Pension%20Fund/Stewardship%20Code%20Statement%20July%202017.pdf |
| <input type="checkbox"/> Attachment | |
| <input checked="" type="checkbox"/> Climate change | |
| URL/Attachment | |
| <input checked="" type="checkbox"/> URL | https://www.nilgosc.org.uk/climate-risk |
| <input type="checkbox"/> Attachment | |
| <input type="checkbox"/> We do not publicly disclose any investment policy components | |

| | | | |
|-------|-----------|---------------|---------|
| SG 03 | Mandatory | Core Assessed | General |
|-------|-----------|---------------|---------|

SG 03.1 Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.

Yes

SG 03.2 Describe your policy on managing potential conflicts of interest in the investment process.

NILGOSC requires its fund managers to have and maintain an effective conflict of interest policy which addresses real or potential conflicts of interest. The processes for identifying, managing and recording conflicts of interest are incorporated into the Investment Management Agreement for each manager. In addition, NILGOSC's equities fund managers have policies on managing conflicts of interest which are set out in each manager's Statement of Adherence to the UK Stewardship Code.

In respect of conflicts of interest within NILGOSC, Committee members adhere to a code of conduct which includes express provisions on the disclosure and handling of actual and potential conflicts of interest. In addition, in order to achieve the maximum degree of openness and impartiality, NILGOSC maintains a Register of Members and Officer's Interests. The Register is available for inspection by appointment at the Committee's offices and is published on the NILGOSC website in compliance with Freedom of Information legislation. Members and senior officers are required to register their interests on appointment and, thereafter, at the beginning of each financial year. The Committee Code of Conduct can be found on NILGOSC's website at <http://www.nilgosc.org.uk/DataEditorUploads/FOI/Code%20of%20Conduct%20April%202015.pdf>

No

| | | | |
|-------|-----------|-------------|---------|
| SG 04 | Voluntary | Descriptive | General |
|-------|-----------|-------------|---------|

Private

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|-------|-----------|-----------------------|---------|
| SG 05 | Mandatory | Gateway/Core Assessed | General |
|-------|-----------|-----------------------|---------|

SG 05.1 Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.

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

SG 05.2 Additional information. [Optional]

There are specific objectives and key performance indicators included in NILGOSC's Corporate Plan in relation to responsible investment activities. Progress against these is monitored and reviewed on a quarterly basis and reported through NILGOSC's Annual Report and Accounts each year. NILGOSC also reviews its investment strategy on an annual basis, which includes consideration of its responsible investment activities.

| | | | |
|-------|-----------|-------------|---------|
| SG 06 | Voluntary | Descriptive | General |
|-------|-----------|-------------|---------|

Private

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|-------|-----------|---------------|---------|
| SG 07 | Mandatory | Core Assessed | General |
|-------|-----------|---------------|---------|

SG 07.1 Indicate the internal and/or external roles used by your organisation, and indicate for each whether they have oversight and/or implementation responsibilities for responsible investment.

Roles

- Board members or trustees
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Internal Roles (triggers other options)

Select from the below internal roles

- Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment

- No oversight/accountability or implementation responsibility for responsible investment
- Other Chief-level staff or head of department, specify
 - Deputy Secretary, Investment Services Manager
- Oversight/accountability for responsible investment
- Implementation of responsible investment
- No oversight/accountability or implementation responsibility for responsible investment
- Portfolio managers
- Investment analysts
- Dedicated responsible investment staff
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Investor relations
- Other role, specify (1)
- Other role, specify (2)
- External managers or service providers
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment

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

Voting at as many company meetings as possible, and engaging with companies both directly and through collaborative engagements. Monitoring external managers' ability to integrate ESG issues into the investment process.

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

0.5

| | | | |
|-----------------|---|--------------------|----------------|
| SG 07 CC | Mandatory to Report, Voluntary to Disclose | Descriptive | General |
|-----------------|---|--------------------|----------------|

Private

| | | | |
|--------------|------------------|----------------------------|----------------|
| SG 08 | Voluntary | Additional Assessed | General |
|--------------|------------------|----------------------------|----------------|

Private

| | | | |
|--------------|------------------|----------------------|----------------|
| SG 09 | Mandatory | Core Assessed | PRI 4,5 |
|--------------|------------------|----------------------|----------------|

SG 09.1 Select the collaborative organisation and/or initiatives of which your organisation is a member or in which it participated during the reporting year, and the role you played.

- Principles for Responsible Investment

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

Basic

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

We are a signatory and were also a supporting investor in a PRI facilitated collaborative engagement: Water Risks in Agricultural Supply Chains

- Asian Corporate Governance Association
- Australian Council of Superannuation Investors
- AVCA: Sustainability Committee
- France Invest – La Commission ESG
- BVCA – Responsible Investment Advisory Board
- CDP Climate Change

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

Basic

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

We are a signatory and participated in the 2018 Non-discloser campaign. We also signed up to the CDP 2019 Non-discloser campaign during the year to 31 March 2019.

- CDP Forests

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

Basic

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

We are a signatory and participated in the 2018 Non-discloser campaign. We also signed up to the CDP 2019 Non-discloser campaign during the year to 31 March 2019.

CDP Water

| |
|--|
| Your organisation's role in the initiative during the reporting period (see definitions) |
| Basic |
| Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional] |
| We are a signatory and participated in the 2018 Non-discloser campaign. We also signed up to the CDP 2019 Non-discloser campaign during the year to 31 March 2019. |

CFA Institute Centre for Financial Market Integrity

Climate Action 100+

| |
|--|
| Your organisation's role in the initiative during the reporting period (see definitions) |
| Basic |
| Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional] |
| Supporting signatory. |

- Code for Responsible Investment in SA (CRISA)
- Council of Institutional Investors (CII)
- Eumedion
- Extractive Industries Transparency Initiative (EITI)
- ESG Research Australia
- Invest Europe Responsible Investment Roundtable
- Global Investors Governance Network (GIGN)
- Global Impact Investing Network (GIIN)
- Global Real Estate Sustainability Benchmark (GRESB)
- Green Bond Principles
- HKVCA: ESG Committee
- Institutional Investors Group on Climate Change (IIGCC)
- Interfaith Center on Corporate Responsibility (ICCR)
- International Corporate Governance Network (ICGN)
- Investor Group on Climate Change, Australia/New Zealand (IGCC)
- International Integrated Reporting Council (IIRC)
- Investor Network on Climate Risk (INCR)/CERES
- Local Authority Pension Fund Forum
- Principles for Financial Action in the 21st Century
- Principles for Sustainable Insurance
- Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify
- Responsible Finance Principles in Inclusive Finance
- Shareholder Association for Research and Education (Share)
- United Nations Environmental Program Finance Initiative (UNEP FI)
- United Nations Global Compact
- Other collaborative organisation/initiative, specify

2018 Global Investor Statement to Governments on Climate Change

| |
|--|
| Your organisation's role in the initiative during the reporting year (see definitions) |
| Basic |
| Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional] |
| Signatory to the letter. |

Other collaborative organisation/initiative, specify

UK Pension Scheme Responsible Investment Roundtable

| |
|--|
| Your organisation's role in the initiative during the reporting year (see definitions) |
| Basic |
| Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional] |
| NILGOSC Officers attend meetings. |

Other collaborative organisation/initiative, specify

Other collaborative organisation/initiative, specify

| | | | |
|---------|--|---------------|-------|
| SG 09.2 | Mandatory to Report, Voluntary to Disclose | Descriptive | PRI 1 |
| Private | | | |
| SG 10 | Mandatory | Core Assessed | PRI 4 |

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

Yes

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

- Provided or supported education or training programmes (this includes peer to peer RI support) Your education or training may be for clients, investment managers, actuaries, broker/dealers, investment consultants, legal advisers etc.)
- Provided financial support for academic or industry research on responsible investment
- Provided input and/or collaborated with academia on RI related work
- Encouraged better transparency and disclosure of responsible investment practices across the investment industry

| Description |
|--|
| Worked with NILGOSC's Investment Managers to encourage better client reporting on their RI practices and activities. |

Frequency of contribution

- Quarterly or more frequently
 - Biannually
 - Annually
 - Less frequently than annually
 - Ad hoc
 - Other
- Spoke publicly at events and conferences to promote responsible investment
 - Wrote and published in-house research papers on responsible investment
 - Encouraged the adoption of the PRI
 - Responded to RI related consultations by non-governmental organisations (OECD, FSB etc.)
 - Wrote and published articles on responsible investment in the media
 - A member of PRI advisory committees/ working groups, specify
 - On the Board of, or officially advising, other RI organisations (e.g. local SIFs)
 - Other, specify

No

| | | | |
|--------------|-----------|---------------------|-----------|
| SG 11 | Voluntary | Additional Assessed | PRI 4,5,6 |
| Private | | | |

| | | | |
|--------------|-----------|---------------|-------|
| SG 12 | Mandatory | Core Assessed | PRI 4 |
|--------------|-----------|---------------|-------|

SG 12.1 Indicate whether your organisation uses investment consultants.

Yes, we use investment consultants

SG 12.2 Indicate how your organisation uses investment consultants in the selection, appointment and/or monitoring of external managers.

We use investment consultants in our selection and appointment of external managers

Asset class

- Listed Equity (LE)
- Fixed income - SSA
- Fixed income - Corporate (financial)
- Fixed income - Corporate (non-financial)
- Fixed income - Securitised
- Infrastructure (INF)
- Property (PR)
- Other asset classes

We use investment consultants in our monitoring of external managers

Asset class

- Listed Equity (LE)
- Fixed income - SSA
- Fixed income - Corporate (financial)
- Fixed income - Corporate (non-financial)
- Fixed income - Securitised
- Infrastructure (INF)
- Property (PR)
- Other asset classes

We do not use investment consultants for selection, appointment and monitoring of external managers.

SG 12.3 Indicate if your organisation considers responsible investment in the selection, appointment and/or review processes for investment consultants.

- Responsible investment is considered when evaluating investment consultants' investment beliefs, strategies and policies in the selection process.
- Responsible investment is considered when evaluating investment consultants' public commitment to, and promotion of, responsible investment in the selection process.
- Responsible investment is considered when reviewing investment consultants' approach to investment manager ratings, research and recommendations in the monitoring process.
- Consultants' responsibilities in terms of responsible investment in manager selection, appointment and monitoring processes are included in our contractual agreements with the investment consultants.
- We do not consider responsible investment in the selection, appointment and/or review processes for investment consultants.

SG 12.4 Indicate whether you use investment consultants for any the following services. Describe the responsible investment components of these services.

- Custodial services
- Investment policy development

Describe how responsible investment is incorporated

The Investment Consultant is required to provide NILGOSC with advice on the impact of ESG issues on the investment strategy

- Strategic asset allocation

Describe how responsible investment is incorporated

The Investment Consultant is required to identify and provide advice on suitable opportunities for responsible investments, particularly in relation to low carbon and climate resilient investments.

- Investment research
- Other, specify (1)

Describe how responsible investment is incorporated

The Investment consultant is also required to assist NILGOSC in fulfilling its obligations as a signatory to the UN Principles of Responsible Investment and to provide advice to NILGOSC in relation to measuring the carbon footprint of its investment portfolio, if required.

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

No, we do not use investment consultants.

SG 12.7 Additional information [Optional].

Investment Consultants are asked to provide details of their in-house expertise in ESG issues, including the number of personnel and the nature and length of their experience in the responsible investment arena. The details provided are assessed and 5% of the total marks available are awarded to ESG capabilities.

| | | | |
|-------|-----------|-------------|-------|
| SG 13 | Mandatory | Descriptive | PRI 1 |
|-------|-----------|-------------|-------|

SG 13.1 Indicate whether the organisation carries out scenario analysis and/or modelling, and if it does, provide a description of the scenario analysis (by asset class, sector, strategic asset allocation, etc.).

- Yes, in order to assess future ESG factors
- Yes, in order to assess future climate-related risks and opportunities
- No, our organisation does not currently carry out scenario analysis and/or modelling

| | | | |
|-------|--|---------------------|-------|
| SG 14 | Mandatory to Report, Voluntary to Disclose | Additional Assessed | PRI 1 |
|-------|--|---------------------|-------|

Private

| | | | |
|----------|-----------|--|---------|
| SG 14 CC | Voluntary | | General |
|----------|-----------|--|---------|

Private

| | | | |
|-------|--|-------------|-------|
| SG 15 | Mandatory to Report, Voluntary to Disclose | Descriptive | PRI 1 |
|-------|--|-------------|-------|

Private

| | | | |
|-------|-----------|-------------|---------|
| SG 17 | Mandatory | Descriptive | General |
|-------|-----------|-------------|---------|

SG 17.1 Describe how you address ESG issues for externally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.

| Asset Class | Describe what processes are in place and the outputs or outcomes achieved |
|-------------|--|
| Cash | While ESG is incorporated into the selection, appointment and monitoring process for all NILGOSC's external managers, cash is not specifically considered. |

| | | | |
|-------|-----------|-------------|---------|
| SG 18 | Voluntary | Descriptive | General |
|-------|-----------|-------------|---------|

Private

| | | | |
|-------|-----------|---------------|----------|
| SG 19 | Mandatory | Core Assessed | PRI 2, 6 |
|-------|-----------|---------------|----------|

Selection, Appointment and Monitoring

Do you disclose?

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

The information disclosed to clients/beneficiaries is the same

- Yes
- No

Disclosure to public and URL

Disclosure to public and URL

- How responsible investment considerations are included in manager selection, appointment and monitoring processes
- Details of the responsible investment activities carried out by managers on your behalf
- E, S and/or G impacts and outcomes that have resulted from your managers' investments and/or active ownership
- Other

Less frequently than annually

<http://www.nilgosc.org.uk/DataEditorUploads/Pension%20Fund/Stewardship%20Code%20Statement%20July%202017.pdf>
<http://www.nilgosc.org.uk/DataEditorUploads/Committee/Handbook/Statement%20of%20Responsible%20Investment%20Apr%202017%20final.pdf>

Listed equity - Engagement

Do you disclose?

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

The information disclosed to clients/beneficiaries is the same

- Yes
- No

Disclosure to public and URL

Disclosure to public and URL

- Details on the overall engagement strategy
- Details on the selection of engagement cases and definition of objectives of the selections, priorities and specific goals
- Number of engagements undertaken
- Breakdown of engagements by type/topic
- Breakdown of engagements by region
- An assessment of the current status of the progress achieved and outcomes against defined objectives
- Examples of engagement cases
- Details on eventual escalation strategy taken after the initial dialogue has been unsuccessful (i.e. filing resolutions, issuing a statement, voting against management, divestment etc.)
- Details on whether the provided information has been externally assured
- Outcomes that have been achieved from the engagement
- Other information

Quarterly or more frequently

<http://www.nilgosc.org.uk/engagement-and-initiatives1>

Listed equity – (Proxy) Voting

Do you disclose?

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

The information disclosed to clients/beneficiaries is the same

Yes

No

Disclosure to public and URL

Disclosure to public and URL

- Disclose all voting decisions
- Disclose some voting decisions
- Only disclose abstentions and votes against management

Quarterly or more frequently

<http://www.nilgosc.org.uk/quarterly-voting-reports>
<http://www.nilgosc.org.uk/review-of-proxy-voting-annual-reports>

SG 19.2

Additional information [Optional]

An overview of NILGOSC's responsible investment activities during the year, including voting figures and details of direct and collaborative engagement, is set out in the Annual Report & Accounts, which is available on the NILGOSC website at <http://www.nilgosc.org.uk/annual-reports-and-corporate-plan>. Monthly Voting reports detailing NILGOSC's voting decisions on actively managed equities are published on the NILGOSC website on a quarterly basis and are available at <https://www.nilgosc.org.uk/quarterly-voting-reports>. An annual "Review of Proxy Voting" activity is also available at <https://www.nilgosc.org.uk/voting-policies-and-activity>.

SG Checks

Checks

If there are any messages below, please review them before continuing. If there are no messages below, please save this page and continue.

SAM 01.1 Indicate which of the following ESG incorporation strategies you require your external manager(s) to implement on your behalf for all your listed equity and/or fixed income assets:

Active investment strategies

| Active investment strategies | Listed Equity | FI - SSA | FI - Corporate (financial) | FI - Corporate (non-financial) | FI - Securitised |
|------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| Screening | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Thematic | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Integration | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| None of the above | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Passive investment strategies

| Passive investment strategies | Listed Equity | FI - SSA |
|-------------------------------|-------------------------------------|-------------------------------------|
| Screening | <input type="checkbox"/> | <input type="checkbox"/> |
| Thematic | <input type="checkbox"/> | <input type="checkbox"/> |
| Integration | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| None of the above | <input type="checkbox"/> | <input type="checkbox"/> |

SAM 02.1 Indicate what RI-related information your organisation typically covers in the majority of selection documentation for your external managers

| | LE | FI - SSA | FI - Corporate (financial) | FI - Corporate (non-financial) | FI - Securitised | Property | Infrastructure |
|---|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| Your organisation's investment strategy and how ESG objectives relate to it | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| ESG incorporation requirements | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| ESG reporting requirements | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Other | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| No RI information covered in the selection documentation | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

SAM 02.2 Explain how your organisation evaluates the investment manager's ability to align between your investment strategy and their investment approach

Strategy

| | LE | FI - SSA | FI - Corporate (financial) | FI - Corporate (non-financial) | FI - Securitised | Property | Infrastructure |
|---|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| Assess the time horizon of the investment manager's offering vs. your/beneficiaries' requirements | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Assess the quality of investment policy and its reference to ESG | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Assess the investment approach and how ESG objectives are implemented in the investment process | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Review the manager's firm-level vs. product-level approach to RI | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Assess the ESG definitions to be used | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Other | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| None of the above | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

ESG people/oversight

| | LE | FI - SSA | FI - Corporate (financial) | FI - Corporate (non-financial) | FI - Securitised | Property | Infrastructure |
|---|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| Assess ESG expertise of investment teams | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Review the oversight and responsibilities of ESG implementation | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Review how is ESG implementation enforced /ensured | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |

| | | | | | | | |
|--|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| Review the manager's RI-promotion efforts and engagement with the industry | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Other | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| None of the above | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Process/portfolio construction/investment valuation

| | LE | FI - SSA | FI - Corporate (financial) | FI - Corporate (non-financial) | FI - Securitised | Property | Infrastructure |
|---|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| Review the process for ensuring the quality of the ESG data used | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Review and agree the use of ESG data in the investment decision making process | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Review and agree the impact of ESG analysis on investment decisions | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Review and agree ESG objectives (e.g. risk reduction, return seeking, real-world impact) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Review and agree manager's ESG risk framework | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Review and agree ESG risk limits at the portfolio level (portfolio construction) and other ESG objectives | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Review how ESG materiality is evaluated by the manager | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Review process for defining and communicating on ESG incidents | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Review and agree ESG reporting frequency and detail | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Other, specify | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| None of the above | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

SAM 02.3 Indicate the selection process and its ESG/RI components

- Review ESG/RI responses to RfP, RfI, DDQ etc.
- Review responses to PRI's Limited Partners' Responsible Investment Due Diligence Questionnaire (LP DDQ)
- Review publicly available information on ESG/RI
- Review assurance process on ESG/RI data and processes
- Review PRI Transparency Reports
- Request and discuss PRI Assessment Reports
- Meetings with the potential shortlisted managers covering ESG/RI themes
- Site visits to potential managers offices
- Other, specify

SAM 02.4 When selecting external managers does your organisation set any of the following:

| | LE | FI - SSA | FI - Corporate (financial) | FI - Corporate (non-financial) | FI - Securitised | Property | Infrastructure |
|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| ESG performance development targets | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ESG score | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| ESG weight | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Real world economy targets | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Other RI considerations | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| None of the above | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

SAM 02.5 Describe how the ESG information reviewed and discussed affects the selection decision making process.[OPTIONAL]

Investment Manager appointments are made following an open and transparent procurement process. Responsible investment is one of the criteria in which managers need to demonstrate their capabilities. The details they provide are assessed and 5% of the total marks are awarded to this criteria. Only those managers who demonstrate satisfactory ESG Practices will be considered for appointment.

SAM 03 Mandatory Additional Assessed PRI 2

SAM 03.1 Indicate how your organisation typically evaluates the manager's active ownership practices in the majority of the manager selection process.

Engagement

| | LE | FI - SSA | FI - Corporate (financial) | FI - Corporate (non-financial) | FI - Securitised |
|--|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| Review the manager's engagement policy | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Review the manager's engagement process (with examples and outcomes) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Ensure whether engagement outcomes feed back into the investment decision-making process | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Other engagement issues in your selection process specify | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

(Proxy) voting

| | LE |
|---|---|
| Review the manager's voting policy | <input checked="" type="checkbox"/> Review the manager's voting policy - LE |
| Review the manager's ability to align voting activities with clients' specific voting policies | <input type="checkbox"/> Review the manager's ability to align voting activities with clients' specific voting policies - LE |
| Review the manager's process for informing clients about voting decisions | <input checked="" type="checkbox"/> Review the manager's process for informing clients about voting decisions - LE |
| Ensure whether voting outcomes feed back into the investment decision-making process | <input type="checkbox"/> Ensure that voting outcomes feed back into the investment decision-making process - LE |
| Review the number of votes cast as a percentage of ballots/AGMs or holdings and available rationale | <input type="checkbox"/> Review the number of votes cast as a percentage of ballots/AGMs or holdings and available rationale - LE |
| Other active ownership voting issues in your selection process; specify | <input type="checkbox"/> Other active ownership voting issues in your selection process; specify - LE |

SAM 03.2 Describe how you assess if the manager's engagement approach is effective.

- Impact on investment decisions
- Financial impact on target company or asset class
- Impact on ESG profile of company or the portfolio
- Evidence of changes in corporate practices(i.e. ESG policies and implementation activities)
- Other, specify
- None of the above

SAM 03.3 Describe how you assess if the manager's voting approach is effective/appropriate

- Impact on investment decisions
- Impact on ESG profile of company or the portfolio
- Evidence of changes in corporate practices(i.e. ESG policies and implementation activities)
- Other, specify
- None of the above

SAM 04 Mandatory Core Assessed PRI 1

SAM 04.1 Indicate if in the majority of cases and where the structure of the product allows, your organisation does any of the following as part of the manager appointment and/or commitment process

- Sets standard benchmarks or ESG benchmarks
- Defines ESG objectives and/ or ESG related exclusions/restrictions
- Sets incentives and controls linked to the ESG objectives
- Requires reporting on ESG objectives
- Requires the investment manager to adhere to ESG guidelines, regulations, principles or standards
- Other, specify (1)
- Other, specify (2)
- None of the above

SAM 04.2 Provide an example per asset class of your benchmarks, objectives, incentives/controls and reporting requirements that would typically be included in your managers' appointment.

| Asset class | | | |
|---|----------------|--|---|
| <input checked="" type="checkbox"/> Listed equity (LE) | | | |
| <table border="1"> <thead> <tr> <th>Benchmark</th> </tr> </thead> <tbody> <tr> <td><input checked="" type="checkbox"/> We do not set benchmarks</td> </tr> </tbody> </table> | Benchmark | <input checked="" type="checkbox"/> We do not set benchmarks | |
| Benchmark | | | |
| <input checked="" type="checkbox"/> We do not set benchmarks | | | |
| <table border="1"> <thead> <tr> <th>ESG Objectives</th> </tr> </thead> <tbody> <tr> <td><input type="checkbox"/> ESG related strategy, specify</td> </tr> <tr> <td><input type="checkbox"/> ESG related investment restrictions, specify</td> </tr> </tbody> </table> | ESG Objectives | <input type="checkbox"/> ESG related strategy, specify | <input type="checkbox"/> ESG related investment restrictions, specify |
| ESG Objectives | | | |
| <input type="checkbox"/> ESG related strategy, specify | | | |
| <input type="checkbox"/> ESG related investment restrictions, specify | | | |

- ESG integration, specify

Managers are required to take into consideration ESG (Environmental, Social and Governance) issues, including climate risk as part of the investment process, provided the primary financial obligation is not compromised.

- Engagement, specify

All active fund managers are encouraged to engage, on NILGOSC's behalf, with those companies where ESG policies fall short of acceptable standards and where this is likely to have a detrimental effect on the long-term value of the company.

- Voting, specify
- Promoting responsible investment
- ESG specific improvements
- Other, specify

Incentives and controls

- We do not set incentives and controls

Reporting requirements

- Monthly
- Quarterly
- Bi-annually
- Annually
- Ad-hoc/when requested

- Fixed income - SSA (SSA)

Benchmark

- We do not set benchmarks

ESG Objectives

- ESG related strategy, specify
- ESG related investment restrictions, specify
- ESG integration, specify

Managers are required to take into consideration ESG (Environmental, Social and Governance) issues, including climate risk as part of the investment process, provided the primary financial obligation is not compromised.

- Engagement, specify

All active fund managers are encouraged to engage, on NILGOSC's behalf, with those issuers where ESG policies fall short of acceptable standards and where this is likely to have a detrimental effect on the long-term value of the company.

- Voting, specify
- Promoting responsible investment
- ESG specific improvements
- Other, specify

Incentives and controls

- We do not set incentives and controls

Reporting requirements

- Ad-hoc/when requested
- Annually
- Bi-annually
- Quarterly
- Monthly

- Fixed income - Corporate (financial)

Benchmark

- We do not set benchmarks

ESG Objectives

- Other, specify
- ESG related strategy, specify
- ESG related investment restrictions, specify
- ESG integration, specify

Managers are required to take into consideration ESG (Environmental, Social and Governance) issues, including climate risk as part of the investment process, provided the primary financial obligation is not compromised.

- Engagement, specify

All active fund managers are encouraged to engage, on NILGOSC's behalf, with those companies where ESG policies fall short of acceptable standards and where this is likely to have a detrimental effect on the long-term value of the company.

- Voting, specify
- Promoting responsible investment
- ESG specific improvements
- Other, specify

Incentives and controls

- We do not set incentives and controls

Reporting requirements

- Ad-hoc/when requested
- Annually
- Bi-annually
- Quarterly
- Monthly

- Fixed income - Corporate (non-financial)

Benchmark

- We do not set benchmarks

ESG Objectives

- Other, specify
- ESG related strategy, specify
- ESG related investment restrictions, specify
- ESG integration, specify

Managers are required to take into consideration ESG (Environmental, Social and Governance) issues, including climate risk as part of the investment process, provided the primary financial obligation is not compromised.

- Engagement, specify

All active fund managers are encouraged to engage, on NILGOSC's behalf, with those companies where ESG policies fall short of acceptable standards and where this is likely to have a detrimental effect on the long-term value of the company.

- Voting, specify
- Promoting responsible investment
- ESG specific improvements
- Other, specify

Incentives and controls

- We do not set incentives and controls

Reporting requirements

- Ad-hoc/when requested
- Annually
- Bi-annually
- Quarterly
- Monthly

- Fixed income - Securitised

Benchmark

- We do not set benchmarks

ESG Objectives

- ESG related strategy, specify
- ESG related investment restrictions, specify
- ESG integration, specify

Managers are required to take into consideration ESG (Environmental, Social and Governance) issues, including climate risk as part of the investment process, provided the primary financial obligation is not compromised.

- Engagement, specify

All active fund managers are encouraged to engage, on NILGOSC's behalf, with those companies where ESG policies fall short of acceptable standards and where this is likely to have a detrimental effect on the long-term value of the company.

- Voting, specify
- Promoting responsible investment
- ESG specific improvements
- Other, specify

Incentives and controls

- We do not set incentives and controls

Reporting requirements

- Ad-hoc/when requested
- Annually
- Bi-annually
- Quarterly
- Monthly

- Property

Benchmark

- We do not set benchmarks

ESG Objectives

- ESG related strategy, specify
- ESG related investment restrictions, specify
- ESG integration, specify

Managers are required to take into consideration ESG (Environmental, Social and Governance) issues, including climate risk as part of the investment process, provided the primary financial obligation is not compromised.

- Engagement, specify
- Voting, specify
- Promoting responsible investment
- ESG specific improvements
- Other, specify

Incentives and controls

- We do not set incentives and controls

Reporting requirements

- Monthly
- Quarterly
- Bi-annually
- Annually
- Ad-hoc/when requested

- Infrastructure

Benchmark

- We do not set benchmarks

ESG Objectives

- ESG related strategy, specify
- ESG related investment restrictions, specify
- ESG integration, specify

Managers are required to take into consideration ESG (Environmental, Social and Governance) issues, including climate risk as part of the investment process, provided the primary financial obligation is not compromised.

- Engagement, specify
- Voting, specify
- Promoting responsible investment
- ESG specific improvements
- Other, specify

Incentives and controls

- We do not set incentives and controls

Reporting requirements

- Ad-hoc/when requested
- Annually
- Bi-annually
- Quarterly
- Monthly

SAM 04.3

Indicate which of these actions your organisation might take if any of the requirements are not met

- Discuss requirements not met and set project plan to rectify

- Place investment manager on a "watch list"
- Track and investigate reason for non-compliance
- Re-negotiate fees
- Failing all actions, terminate contract with the manager
- Other, specify
- No actions are taken if any of the ESG requirements are not met

SAM 04.4 Provide additional information relevant to your organisation's appointment processes of external managers. [OPTIONAL]

Once appointed, a manager is required to provide regular performance reports and these will include reporting on its responsible investment activities, including voting and engagement (if applicable) on a quarterly basis, and any other reports that may be requested, including carbon risk.

SAM 05 Mandatory Core Assessed PRI 1

SAM 05.1 When monitoring managers, indicate which of the following types of responsible investment information your organisation typically reviews and evaluates

| | LE | FI - SSA | FI - Corporate (financial) | FI - Corporate (non-financial) | FI - Securitised | Property | Infrastructure |
|---|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| ESG objectives linked to investment strategy (with examples) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Evidence on how the ESG incorporation strategy(ies) affected the investment decisions and financial / ESG performance of the portfolio/fund | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Compliance with investment restrictions and any controversial investment decisions | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ESG portfolio characteristics | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| How ESG materiality has been evaluated by the manager in the monitored period | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Information on any ESG incidents | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Metrics on the real economy influence of the investments | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| PRI Transparency Reports | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| PRI Assessment Reports | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| RI-promotion and engagement with the industry to enhance RI implementation | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Changes to the oversight and responsibilities of ESG implementation | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Other general RI considerations in investment management agreements; specify | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| None of the above | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

If you select any "Other" option(s), specify

IMAs include an acknowledgement by the manager that social, environmental and ethical considerations have the potential to impact investment risks and returns and confirms that the Manager will exercise its discretion when making investment decisions with due regard to these considerations and integrate social, environmental and ethical considerations into its assessment of risks, investment opportunities and reporting on the performance of the Fund. They also include expectations for reporting on responsible investment activities.

SAM 05.2 When monitoring external managers, does your organisation set any of the following to measure compliance/progress

| | LE | FI - SSA | FI - Corporate (financial) | FI - Corporate (non-financial) | FI - Securitised | Property | Infrastructure |
|-----------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| ESG score | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ESG weight | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ESG performance minimum threshold | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Real world economy targets | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Other RI considerations | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| None of the above | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

If you select any "Other" option(s), specify

NILGOSC monitors and evaluates the performance of its investment managers on a quarterly basis. The evaluation process incorporates qualitative as well as quantitative factors and each individual manager is assessed against a range of pre-determined criteria. One of these criteria is the manager's ability to integrate ESG issues into the investment process. All managers are required to report back quarterly on any activity undertaken.

SAM 06 Mandatory Additional Assessed PRI 1

SAM 06.1 When monitoring managers, indicate which of the following active ownership information your organisation typically reviews and evaluates from the investment manager in meetings/calls

| Engagement | | | | | |
|---|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| | LE | FI - SSA | FI - Corporate (financial) | FI - Corporate (non-financial) | FI - Securitised |
| Report on engagements undertaken (summary with metrics, themes, issues, sectors or similar) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Report on engagement ESG impacts (outcomes, progress made against objectives and examples) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Information on any escalation strategy taken after initial unsuccessful dialogue | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Alignment with any eventual engagement programme done internally | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Information on the engagement activities' impact on investment decisions | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Other RI considerations relating to engagement in investment management agreements; specify | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| None of the above | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

If you select any `Other` option(s), specify

NILGOSC encourages its fund managers to adhere to the UK Stewardship Code and monitors this by asking fund managers for confirmation as to whether they are signatories to the Code. If a fund manager is a signatory, NILGOSC asks for a copy of the Statement of Adherence and its independent verification, where appropriate.

| (Proxy) voting | |
|---|---|
| | LE |
| Report on voting undertaken (with outcomes and examples) | <input checked="" type="checkbox"/> Report on voting undertaken (with outcomes and examples) - LE |
| Report on voting decisions taken | <input checked="" type="checkbox"/> Report on voting decisions taken - LE |
| Adherence with the agreed upon voting policy | <input type="checkbox"/> Adherence with the agreed upon voting policy - LE |
| Other RI considerations relating to (proxy) voting in investment management agreements; specify | <input type="checkbox"/> Other RI considerations relating to (proxy) voting in investment management agreements; specify - LE |
| None of the above | <input type="checkbox"/> None of the above - LE |

| | | | |
|--------|-----------|---------------|-------|
| SAM 07 | Mandatory | Core Assessed | PRI 2 |
|--------|-----------|---------------|-------|

SAM 07.1 For the listed equities for which you have given your external managers a (proxy) voting mandate, indicate the approximate percentage (+/- 5%) of votes that were cast during the reporting year.

- Votes cast (to the nearest 5%)
- We do not collect this information.

SAM 07.2 For the listed equities for which you have given your external managers a mandate to engage on your behalf, indicate the approximate percentage (+/- 5%) of companies that were engaged with during the reporting year.

101
20Proportion (to the nearest 5%)

SAM 07.3 Additional information [OPTIONAL]

For passively managed equities, votes are cast by NILGOSC's passive fund manager, according to its own voting policies. The manager reports to NILGOSC on its voting activities on a quarterly basis but does not indicate whether any votes are not cast for any reason. All active listed equity managers are required to report back quarterly on any engagement activity undertaken. However, the format and content of these reports vary and it has been difficult to provide a reliable estimate of the proportion of companies engaged with. The estimate provided is based on the number of engagements reported by those managers that provide a total figure. The proportion is based on the average number of stocks held by active managers during the year ending 31/03/19. There may be overlap.

| | | | |
|--------|--|-------------|-------|
| SAM 08 | Mandatory to Report, Voluntary to Disclose | Descriptive | PRI 1 |
|--------|--|-------------|-------|

Private

| | | | |
|--------|-----------|---------------------|---------|
| SAM 09 | Mandatory | Additional Assessed | PRI 1,6 |
|--------|-----------|---------------------|---------|

SAM 09.1 Provide examples of how ESG issues have been addressed in the manager selection, appointment and/or monitoring process for your organisation during the reporting year.

- Add Example 1

| | |
|----------------|-----------------------------------|
| Topic or issue | Manager Selection and Appointment |
| Conducted by | Investment consultants |
| Asset class | All asset classes |

| | |
|-------------------|---|
| Scope and process | Investment Manager appointments are made following an open and transparent procurement process carried out by internal staff and Investment Consultants. Responsible investment is one of the criteria in which managers needed to demonstrate their capabilities as part of the tender process. Only those managers who demonstrate satisfactory ESG Practices were considered for appointment. Due diligence includes evaluation of ESG integration/reporting capabilities, including reviewing PRI assessment reports. |
| Outcomes | Investment Managers were appointed who are able to take into consideration ESG (Environmental, Social and Governance) issues, including climate risk, as part of the investment process, provided the primary financial obligation is not compromised. |

- Add Example 2
- Add Example 3
- Add Example 4
- Add Example 5
- Add Example 6
- Add Example 7
- We are not able to provide examples

| | | | |
|------------|--|--|--------|
| SAM Checks | | | Checks |
|------------|--|--|--------|

If there are any messages below, please review them before continuing. If there are no messages below, please save this page and continue.

LEA 01.1 Indicate whether your organisation has an active ownership policy (includes engagement and/or voting).

Yes

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

Attachment provided:

URL provided:

<http://www.nilgosc.org.uk/DataEditorUploads/Pension%20Fund/Stewardship%20Code%20Statement%20July%202017.pdf>

LEA 01.3 Indicate what your active engagement policy covers:

General approach to Active Ownership

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

Engagement

- ESG issues
- Prioritisation of engagement
- Methods of engagement
- Transparency of engagement activities
- Due diligence and monitoring process
- Insider information
- Escalation strategies
- Service Provider specific criteria
- Other; (specify)

(Proxy) voting approach

Voting

- ESG issues
- Prioritisation and scope of voting activities
- Methods of voting
- Transparency of voting activities
- Regional voting practice approaches
- Filing or co-filing resolutions
- Company dialogue pre/post-vote
- Decision-making processes
- Securities lending processes
- Other; (specify)

Other

None of the above

No

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

Yes

LEA 01.5 Where active ownership activities are conducted by service providers, indicate whether your active ownership policy covers any of the following:

- Outline of service provider's role in implementing your organisation's active ownership policy
- Description of considerations included in service provider selection and agreements
- Identification of key ESG frameworks which service providers must follow
- Outline of information sharing requirements of service providers
- Description of service provider monitoring processes
- Other; (specify)
- None of the above

No

LEA 01.6 Additional information [optional]

NILGOSC acknowledges that good environmental, social and corporate governance (ESG) practices can have a favourable impact both on financial performance and society in general. Accordingly, NILGOSC requires its active investment managers to monitor best practice in this area and ensure that ESG considerations,

where relevant, are taken into account in the investment management process. All active fund managers are instructed to engage, on NILGOSC's behalf, with those companies where ESG policies fall short of acceptable standards and where this is likely to have a detrimental effect on the long-term value of the company.

In 2010 NILGOSC also commenced direct engagement with the UK companies in which it holds shares. NILGOSC writes to all UK listed companies when it has voted against resolutions at the Annual General Meeting (AGM) to outline the rationale for the decision. NILGOSC aims to write to these companies in advance of the meetings to make the engagement as effective as possible. In January 2015, NILGOSC began issuing engagement letters to other European listed companies, as well.

NILGOSC aims to promote effective stewardship and engagement with companies by participating in collaborative engagements and initiatives, with UNPRI signatories through the UNPRI collaboration platform or with other investor groups

| | | | |
|--------|-----------|---------------|-----------|
| LEA 02 | Mandatory | Core Assessed | PRI 1,2,3 |
|--------|-----------|---------------|-----------|

| | |
|----------|--|
| LEA 02.1 | Indicate the method of engagement, giving reasons for the interaction. |
|----------|--|

| Type of engagement | Reason for interaction |
|---|--|
| Individual / Internal staff engagements | <input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> To gain an understanding of ESG strategy and/or management <input type="checkbox"/> We do not engage via internal staff |
| Collaborative engagements | <input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> To gain an understanding of ESG strategy and/or management <input type="checkbox"/> We do not engage via collaborative engagements |
| Service provider engagements | <input type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues <input type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> To gain an understanding of ESG strategy and/or management <input checked="" type="checkbox"/> We do not engage via service providers |

| | | | |
|--------|-----------|---------------|-------|
| LEA 03 | Mandatory | Core Assessed | PRI 2 |
|--------|-----------|---------------|-------|

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

✓ Yes

| | |
|----------|--|
| LEA 03.2 | Indicate the criteria used to identify and prioritise engagements for each type of engagement. |
|----------|--|

| Type of engagement | Criteria used to identify/prioritise engagements |
|---|---|
| Individual / Internal staff engagements | Individual / Internal staff engagements |
| | <input checked="" type="checkbox"/> Geography/market of the companies <input type="checkbox"/> Materiality of the ESG factors <input type="checkbox"/> Exposure (size of holdings) <input type="checkbox"/> Responses to ESG impacts that have already occurred <input type="checkbox"/> Responses to divestment pressure <input type="checkbox"/> Consultation with clients/beneficiaries <input type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) <input checked="" type="checkbox"/> Follow-up from a voting decision <input type="checkbox"/> Client request <input type="checkbox"/> Breaches of international norms <input type="checkbox"/> Other; (specify) <input type="checkbox"/> We do not outline engagement criteria for our individual engagements |

| | |
|---------------------------|---|
| Collaborative engagements | Collaborative engagements |
| | <input type="checkbox"/> Potential to enhance knowledge of ESG issues through other investors <input checked="" type="checkbox"/> Ability to have greater impact on ESG issues <input type="checkbox"/> Ability to add value to the collaboration <input type="checkbox"/> Geography/market of the companies targeted by the collaboration <input type="checkbox"/> Materiality of the ESG factors addressed by the collaboration <input checked="" type="checkbox"/> Exposure (size of holdings) to companies targeted by the collaboration <input type="checkbox"/> Responses to ESG impacts addressed by the collaboration that have already occurred <input type="checkbox"/> Responses to divestment pressure <input checked="" type="checkbox"/> Follow-up from a voting decision <input checked="" type="checkbox"/> Alleviate the resource burden of engagement <input type="checkbox"/> Consultation with clients/beneficiaries <input type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) <input type="checkbox"/> Other; (specify) <input type="checkbox"/> We do not outline engagement criteria for our collaborative engagement providers |

No

LEA 03.3 Additional information. [Optional]

NILGOSC writes to all UK and other European listed companies when it has voted against resolutions at the Annual General Meeting (AGM) to outline the rationale for the decision. NILGOSC aims to write to these companies in advance of the meetings whenever possible.

Collaborative engagements are identified through the PRI or other organisations such as the CDP or the UK Pension Fund Responsible Investment Roundtable. The decision on whether to participate is based on fund exposure, compatibility with NILGOSC's responsible investment policies and resources required, and is approved by the Investment Services Manager and Deputy Secretary.

LEA 04 Mandatory Core Assessed PRI 2

LEA 04.1 Indicate whether you define specific objectives for your organisation's engagement activities.

| | |
|---|--|
| Individual / Internal staff engagements | <input checked="" type="checkbox"/> All engagement activities <input type="checkbox"/> Majority of engagement activities <input type="checkbox"/> Minority of engagement activities <input type="checkbox"/> We do not define specific objectives for engagement activities carried out by internal staff |
| Collaborative engagements | <input type="checkbox"/> All engagement activities <input checked="" type="checkbox"/> Majority of engagement activities <input type="checkbox"/> Minority of engagement activities <input type="checkbox"/> We do not define specific objectives for engagement activities carried out through collaboration |

LEA 04.2 Additional information. [Optional]

NILGOSC is keen to improve its engagement with companies and, where practical, a letter is sent to UK and other European listed companies when NILGOSC has decided not to vote in accordance with management recommendations at the AGM. The overall objective of the engagements is to improve the flow of information between companies and their shareholders, with each letter outlining the reasons for the decision to vote against management recommendation with the objective of encouraging the company to conform to best practice/NILGOSC's expectations in that area.

NILGOSC believes that collaborative engagement is a key part of any responsible investment strategy and will seek to work collectively with other institutional shareholders in order to maximise the influence on individual companies. NILGOSC participates in collaborative initiatives with other like-minded signatories, which seek to improve company behaviour, policies or systemic conditions. Each collaborative engagement will have its own objectives and the decision on whether to participate considers compatibility with NILGOSC's responsible investment policies and beliefs.

LEA 05 Mandatory Core Assessed PRI 2

LEA 05.1 Indicate whether you monitor and/or review engagement outcomes.

| | |
|---|--|
| Individual / Internal staff engagements | <input checked="" type="checkbox"/> Yes, in all cases <input type="checkbox"/> Yes, in a majority of cases <input type="checkbox"/> Yes, in a minority of cases <input type="checkbox"/> We do not monitor, or review engagement outcomes when the engagement is carried out by our internal staff. |
| Collaborative engagements | <input type="checkbox"/> Yes, in all cases <input checked="" type="checkbox"/> Yes, in a majority of cases <input type="checkbox"/> Yes, in a minority of cases <input type="checkbox"/> We do not monitor, or review engagement outcomes when the engagement is carried out through collaboration. |

LEA 05.2 Indicate whether you do any of the following to monitor and/or review the progress of engagement activities.

| | |
|---|--|
| Individual / Internal staff engagements | <input type="checkbox"/> Define timelines/milestones for your objectives <input type="checkbox"/> Track and/or monitor progress against defined objectives and/or KPIs <input type="checkbox"/> Track and/or monitor the progress of action taken when original objectives are not met <input type="checkbox"/> Revisit and, if necessary, revise objectives on a continuous basis <input checked="" type="checkbox"/> Other, specify Company responses recorded and progress reviewed before future meetings to inform voting decisions and/or continued engagement. |
| Collaborative engagements | <input checked="" type="checkbox"/> Define timelines/milestones for your objectives <input checked="" type="checkbox"/> Track and/or monitor progress against defined objectives and/or KPIs <input type="checkbox"/> Track and/or monitor the progress of action taken when original objectives are not met <input checked="" type="checkbox"/> Revisit and, if necessary, revise objectives on a continuous basis <input type="checkbox"/> Other, specify |

LEA 05.3 Additional information. [Optional]

For all votes against management at UK and other European listed companies' AGMs, NILGOSC writes to outline the rationale for the decision. If a response is received before the meeting, the information may be used to inform voting decisions. If a response is received after the meeting, the response will be noted and reviewed before any future meetings. Where a company has indicated that future improvements will be made, progress will be reviewed and used to inform voting decisions and/or continued engagement.

NILGOSC has participated in several collaborative engagements during the year which have set goals and timelines. Meetings take place regularly and/or progress is tracked through updates from members/lead organisation.

LEA 06 Mandatory Additional Assessed PRI 2,4

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

- Yes
- No

LEA 07 Voluntary Additional Assessed PRI 1,2

Private

LEA 08 Mandatory Gateway PRI 2

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

| Type of engagement | Tracking engagements |
|---------------------------------------|---|
| Individual/Internal staff engagements | <input checked="" type="checkbox"/> Yes, we track the number of our engagements in full <input type="checkbox"/> Yes, we partially track the number of our engagements <input type="checkbox"/> We do not track |
| Collaborative engagements | <input checked="" type="checkbox"/> Yes, we track the number of collaborative engagements in full <input type="checkbox"/> Yes, we partially track the number of our collaborative engagements <input type="checkbox"/> We do not track |

LEA 08.2 Additional information. [Optional]

NILGOSC tracks the number of companies engaged with directly by NILGOSC staff, copies of all correspondence are saved, and this information is reported annually.

Single action collaborative engagements are recorded along with any follow up/ outcome information received. For UNPRI facilitated collaborative engagements, engagements are tracked and reported back to the group by lead investors. Other collaborative engagements are also recorded, with updates on progress provided by the leading organisation.

LEA 09 Mandatory to Report, Voluntary to Disclose Core Assessed PRI 2

Private

LEA 10 Voluntary Additional Assessed PRI 2

Private

LEA 11 Voluntary Descriptive PRI 2

Private

LEA 12 Mandatory Descriptive PRI 2

LEA 12.1 Indicate how you typically make your (proxy) voting decisions.

Approach

- We use our own research or voting team and make voting decisions without the use of service providers.
- We hire service providers who make voting recommendations and/or provide research that we use to guide our voting decisions.

Based on

- The service-provider voting policy we sign off on
 - Our own voting policy
 - Our clients' requests or policies
 - Other (explain)
- We hire service providers who make voting decisions on our behalf, except in some pre-defined scenarios where we review and make voting decisions.
- We hire service providers who make voting decisions on our behalf.

LEA 12.2 Provide an overview of how you ensure that your agreed-upon voting policy is adhered to, giving details of your approach when exceptions to the policy are made.

NILGOSC will vote in accordance with its voting policy while taking into consideration company explanations for deviation from best practice, as well as recommendations provided by the service provider where appropriate. Recommendations and advice from other sources, such as investment managers, may also be considered.

Where a decision is made to accept a company's explanation for non-compliance, the reason for the decision is noted and will be reviewed again before the Company's next meeting.

LEA 12.3 Additional information. [Optional]

NILGOSC has appointed a specialist corporate governance partner, Minerva Analytics, to coordinate its corporate governance and voting activities. NILGOSC avails of Minerva's corporate governance research service, which provides detailed information and financial analysis for each of its actively managed UK and global equity holdings. This information is used by the Investment Officer at NILGOSC to make informed voting decisions at each investee company based on NILGOSC's own voting policies.

For passively managed equities, votes are cast by NILGOSC's passive fund manager, Legal & General, according to its own voting policies. The manager reports to NILGOSC on its voting activities on a quarterly basis.

| | | | |
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| LEA 14 | Voluntary | Additional Assessed | PRI 2 |
| Private | | | |

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| LEA 15 | Mandatory | Descriptive | PRI 2 |
|--------|-----------|-------------|-------|

LEA 15.1 Indicate the proportion of votes participated in within the reporting year in which where you or the service providers acting on your behalf raised concerns with companies ahead of voting.

- 100%
- 99-75%
- 74-50%
- 49-25%
- 24-1%
- Neither we nor our service provider(s) raise concerns with companies ahead of voting

LEA 15.2 Indicate the reasons for raising your concerns with these companies ahead of voting.

- Vote(s) concerned selected markets
- Vote(s) concerned selected sectors
- Vote(s) concerned certain ESG issues
- Vote(s) concerned companies exposed to controversy on specific ESG issues
- Vote(s) concerned significant shareholdings
- Client request
- Other

LEA 15.3 Additional information. [Optional]

NILGOSC is keen to improve its engagement with companies and, where practical, a letter is sent to those companies where NILGOSC has not voted in accordance with management recommendations, providing a brief explanation for the voting decisions. Where possible, the letter is sent in advance of the meeting being voted on. It is hoped that by providing this explanation, the flow of information between companies and their shareholders can be improved. Currently, this policy applies to UK and European listed company AGMs only in NILGOSC's actively managed equity portfolios. The figures above are based on the number of companies where an engagement letter was sent prior to the AGM date, as a proportion of the total number of meetings voted on during the year ending 31 March 2019. For passively managed equities, votes are cast by NILGOSC's passive fund manager, Legal & General, according to its own voting policies. The manager reports to NILGOSC on its voting activities on a quarterly basis.

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| LEA 16 | Mandatory | Core Assessed | PRI 2 |
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LEA 16.1 Indicate the proportion of votes where you, and/or the service provider(s) acting on your behalf, communicated the rationale to companies for abstaining or voting against management recommendations. Indicate this as a percentage out of all eligible votes.

- 100%
- 99-75%
- 74-50%
- 49-25%
- 24-1%
- We do not communicate the rationale to companies
- Not applicable because we and/or our service providers did not abstain or vote against management recommendations

| | |
|--|---|
| LEA 16.2 | Indicate the reasons why your organisation would communicate to companies, the rationale for abstaining or voting against management recommendations. |
| <input checked="" type="checkbox"/> Vote(s) concern selected markets <input type="checkbox"/> Vote(s) concern selected sectors <input checked="" type="checkbox"/> Vote(s) concern certain ESG issues <input type="checkbox"/> Vote(s) concern companies exposed to controversy on specific ESG issues <input type="checkbox"/> Vote(s) concern significant shareholdings <input type="checkbox"/> Client request <input type="checkbox"/> Other | |

| | |
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| LEA 16.3 | In cases where your organisation does communicate the rationale for abstaining or voting against management recommendations, indicate whether this rationale is made public. |
| <input type="radio"/> Yes <input checked="" type="radio"/> No | |

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| LEA 16.4 | Additional information. [Optional] |
| <p>NILGOSC is keen to improve its engagement with companies and, where practical, a letter is sent to those companies where NILGOSC has not voted in accordance with management recommendations, providing a brief explanation for the voting decisions. It is hoped that by providing this explanation, the flow of information between companies and their shareholders can be improved. Currently, this policy applies to UK and European listed company AGMs only in NILGOSC's actively managed equity portfolios. The figures above are based on the number of companies where an engagement letter was sent, as a proportion of the total number of meetings voted on during the year ending 31 March 2019. For passively managed equities, votes are cast by NILGOSC's passive fund manager, Legal & General, according to its own voting policies. The manager reports to NILGOSC on its voting activities on a quarterly basis.</p> | |

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| LEA 17 | Mandatory | Core Assessed | PRI 2 |
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| LEA 17.1 | For listed equities in which you or your service provider have the mandate to issue (proxy) voting instructions, indicate the percentage of votes cast during the reporting year. | | | | |
| <input checked="" type="radio"/> We do track or collect this information | | | | | |
| | <table border="1"> <tr> <td></td> <td>Votes cast (to the nearest 1%)</td> </tr> <tr> <td>100%</td> <td></td> </tr> </table> | | Votes cast (to the nearest 1%) | 100% | |
| | Votes cast (to the nearest 1%) | | | | |
| 100% | | | | | |
| | <table border="1"> <tr> <td></td> <td>Specify the basis on which this percentage is calculated</td> </tr> <tr> <td colspan="2"> <input type="radio"/> Of the total number of ballot items on which you could have issued instructions <input checked="" type="radio"/> Of the total number of company meetings at which you could have voted <input type="radio"/> Of the total value of your listed equity holdings on which you could have voted </td> </tr> </table> | | Specify the basis on which this percentage is calculated | <input type="radio"/> Of the total number of ballot items on which you could have issued instructions <input checked="" type="radio"/> Of the total number of company meetings at which you could have voted <input type="radio"/> Of the total value of your listed equity holdings on which you could have voted | |
| | Specify the basis on which this percentage is calculated | | | | |
| <input type="radio"/> Of the total number of ballot items on which you could have issued instructions <input checked="" type="radio"/> Of the total number of company meetings at which you could have voted <input type="radio"/> Of the total value of your listed equity holdings on which you could have voted | | | | | |
| <input type="radio"/> We do not track or collect this information | | | | | |

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| LEA 18 | Voluntary | Additional Assessed | PRI 2 |
| Private | | | |

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| LEA 19 | Mandatory | Core Assessed | PRI 2 |
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| LEA 19.1 | Indicate whether your organisation has a formal escalation strategy following unsuccessful voting. |
| <input type="radio"/> Yes <input checked="" type="radio"/> No | |

| | | | |
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| LEA 20 | Voluntary | Descriptive | PRI 2 |
| Private | | | |

| | | | |
|---------|-----------|-------------|-------|
| LEA 21 | Voluntary | Descriptive | PRI 2 |
| Private | | | |

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| LEA Checks | | | Checks |
|------------|--|--|--------|

If there are any messages below, please review them before continuing. If there are no messages below, please save this page and continue.

| | | | | | |
|---|--|---------------------|---------|---------|------------------|
| CM1 01 | Mandatory | Additional Assessed | General | | |
| CM1 01.1 | Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone: | | | | |
| <input type="checkbox"/> Third party assurance over selected responses from this year's PRI Transparency Report <input type="checkbox"/> Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year <input type="checkbox"/> Third party assurance or audit of the correct implementation of RI processes (that have been reported to the PRI this year) <input type="checkbox"/> Internal audit of the correct implementation of RI processes and/or accuracy of RI data (that have been reported to the PRI this year) <input checked="" type="checkbox"/> Internal verification of responses before submission to the PRI (e.g. by the CEO or the board) <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Whole PRI Transparency Report has been internally verified <input type="checkbox"/> Selected data has been internally verified <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above | | | | | |
| CM1 02 | Mandatory | Descriptive | General | | |
| CM1 02.1 | We undertook third party assurance on last year's PRI Transparency Report | | | | |
| <input type="checkbox"/> Whole PRI Transparency Report was assured last year <input type="checkbox"/> Selected data was assured in last year's PRI Transparency Report <input checked="" type="checkbox"/> We did not assure last year's PRI Transparency report <input type="checkbox"/> None of the above, we were in our preparation year and did not report last year. | | | | | |
| CM1 03 | Mandatory | Descriptive | General | | |
| CM1 03.1 | We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report: | | | | |
| <input type="checkbox"/> We adhere to an RI certification or labelling scheme <input type="checkbox"/> We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report <input type="checkbox"/> ESG audit of holdings <input type="checkbox"/> Other, specify <input checked="" type="checkbox"/> None of the above | | | | | |
| CM1 04 | Mandatory | Descriptive | General | | |
| CM1 04.1 | Do you plan to conduct third party assurance of this year's PRI Transparency report? | | | | |
| <input type="checkbox"/> Whole PRI Transparency Report will be assured <input type="checkbox"/> Selected data will be assured <input checked="" type="checkbox"/> We do not plan to assure this year's PRI Transparency report | | | | | |
| CM1 07 | Mandatory | Descriptive | General | | |
| CM1 07.1 | Indicate who has reviewed/verified internally the whole - or selected data of the - PRI Transparency Report . and if this applies to selected data please specify what data was reviewed | | | | |
| <input type="checkbox"/> CEO or other Chief-Level staff <input type="checkbox"/> The Board <input type="checkbox"/> Investment Committee <input type="checkbox"/> Compliance Function <input type="checkbox"/> RI/ESG Team <input type="checkbox"/> Investment Teams <input type="checkbox"/> Legal Department <input checked="" type="checkbox"/> Other (specify) <table border="1" style="width: 100%; margin-top: 5px;"> <tr> <td style="width: 150px;">specify</td> </tr> <tr> <td>Deputy Secretary</td> </tr> </table> | | | | specify | Deputy Secretary |
| specify | | | | | |
| Deputy Secretary | | | | | |