




Principle	Objective	Priority
LEA 02	Mandatory	High
<b>Type of engagement</b>		
Individual/ internal staff engagements	<ul style="list-style-type: none"> <li>☐ To highlight important issues/ concerns to the company's leadership</li> <li>☐ To encourage improved ESG practices</li> <li>☐ Other: specify</li> </ul>	
Collaborative engagements	<ul style="list-style-type: none"> <li>☐ To highlight important issues/ concerns to the company's leadership</li> <li>☐ To encourage improved ESG practices</li> <li>☐ Other: specify</li> </ul>	
Service provider engagements	<ul style="list-style-type: none"> <li>☐ To highlight important issues/ concerns to the company's leadership</li> <li>☐ To encourage improved ESG practices</li> <li>☐ Other: specify</li> </ul>	
<b>Reason for interaction</b>		
<ul style="list-style-type: none"> <li>☐ To highlight important issues/ concerns to the company's leadership</li> <li>☐ To encourage improved ESG practices</li> <li>☐ Other: specify</li> </ul>		

# RI TRANSPARENCY REPORT 2017

## Elo Mutual Pension Insurance Company

OO 01	Mandatory	Gateway/Peering	General
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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 02	Mandatory	Peering	General
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OO 02.1 Select the location of your organisation's headquarters.

Finland

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).

85

OO 03	Mandatory	Descriptive	General
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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
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OO 04.1 Indicate the year end date for your reporting year.

31/12/2016

OO 04.2 Indicate your total AUM at the end of your reporting year, excluding subsidiaries you have chosen not to report on.

Total AUM  
21,500,000,000 EUR

OO 05	Mandatory to Report, Voluntary to Disclose	Gateway	General
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OO 05.1 Provide an approximate percentage breakdown of your AUM at the end of your reporting year using the following asset classes:

	Internally managed (%)	Externally managed (%)
Listed equity	10-50%	10-50%
Fixed income	10-50%	10-50%
Private equity	<10%	<10%
Property	<10%	<10%
Infrastructure	<10%	<10%
Commodities	0	0
Hedge funds	0	10-50%
Forestry	0	<10%
Farmland	0	0
Inclusive finance	<10%	0
Cash	<10%	0

Other (1), specify	0	0
Other (2), specify	0	0

OO 06	Mandatory	Descriptive	General
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OO 06.1	How you would like to disclose your asset class mix.		
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- as percentage breakdown
- as broad ranges

OO 07	Mandatory to Report, Voluntary to Disclose	Gateway	General
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OO 07.1	Provide to the nearest 5% the percentage breakdown of your Fixed Income AUM at the end of your reporting year, using the following categories.		
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Private

OO 08	Mandatory to Report, Voluntary to Disclose	Peering	General
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OO 08.1	Provide a breakdown of your organisation's externally managed assets between segregated mandates and pooled funds.		
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Private

OO 08.2	Additional information. [Optional]		
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Private

OO 09	Mandatory to Report, Voluntary to Disclose	Peering	General
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OO 09.1	Indicate the breakdown of your organisation's AUM by market.		
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Private

OO 09.2	Additional information. [Optional]		
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Private

OO 10	Mandatory	Gateway	General
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OO 10.1	Select the direct or indirect ESG incorporation activities your organisation implemented for listed equities in the reporting year.		
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- We incorporate ESG in our investment decisions on our internally managed assets
- We address ESG incorporation in our external manager selection, appointment and/or monitoring processes
- We do not incorporate ESG in our directly managed listed equity and/or we do not address ESG incorporation in our external manager selection, appointment and/or monitoring processes.

OO 10.2	Select the direct or indirect engagement activities your organisation implemented for listed equity in the reporting year.		
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- 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 issues on our behalf
- We do not engage directly and do not require external managers to engage with companies on ESG factors.

OO 10.3	Select the direct or indirect voting activities your organisation implemented for listed equity in the reporting year		
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- 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

OO 11	Mandatory	Gateway	General
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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).		
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- Fixed income - SSA
- Fixed income - corporate (financial)
- Fixed income - corporate (non-financial)
- Private equity
- Property
- Infrastructure
- Inclusive finance
- Cash
- None of the above

OO 11.2	Select the externally managed assets classes where you addressed ESG incorporation and/or active ownership in your external manager selection, appointment and/or monitoring processes (during the reporting year)		
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- Fixed income - SSA
- Fixed income - corporate (financial)

- Fixed income - corporate (non-financial)
- Private equity
- Property
- Infrastructure
- Hedge funds
- Forestry
- None of the above

OO 12	Mandatory	Gateway	General
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**OO 12.1** Select from below any additional applicable modules or sections you would like to report on voluntarily. You are only required to report on asset classes that represent 10% or more of your AUM.

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 incorporation
<input checked="" type="checkbox"/> Listed Equity incorporation
Direct - Listed Equity active ownership
<input checked="" type="checkbox"/> Engagements <input checked="" type="checkbox"/> (Proxy) voting
Direct - Fixed Income
<input checked="" type="checkbox"/> Fixed income - SSA <input checked="" type="checkbox"/> Fixed income - Corporate (financial) <input checked="" type="checkbox"/> Fixed income - Corporate (non-financial)
Direct - Other asset classes with dedicated modules
<input checked="" type="checkbox"/> Infrastructure
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"/> Infrastructure
Closing module
<input checked="" type="checkbox"/> Closing module

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

✔ Yes

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

Policy components/types	Coverage by AUM
<input checked="" type="checkbox"/> Policy setting out your overall approach	<input checked="" type="radio"/> Applicable policies cover all AUM <input type="radio"/> Applicable policies cover a majority of AUM <input type="radio"/> Applicable policies cover a minority of AUM
<input checked="" type="checkbox"/> Formalised guidelines on environmental factors	
<input type="checkbox"/> Formalised guidelines on social factors	
<input type="checkbox"/> Formalised guidelines on corporate governance factors	
<input checked="" type="checkbox"/> Asset class-specific RI guidelines	
<input type="checkbox"/> Sector specific RI guidelines	
<input type="checkbox"/> Screening / exclusions policy	
<input checked="" type="checkbox"/> Engagement policy	
<input checked="" type="checkbox"/> (Proxy) voting policy	
<input type="checkbox"/> Other, specify (1)	
<input type="checkbox"/> Other, specify(2)	

SG 01.3 Indicate if the investment policy covers any of the following

- Your organisation's definition of ESG and/or responsible investment and it's relation to investments
- Your investment objectives that take ESG factors/real economy influence into account
- Processes / approaches to incorporating ESG
- Time horizon of your investment
- Governance structure of organisational ESG responsibilities
- ESG incorporation approaches
- Active ownership approaches
- Reporting
- Other RI considerations, specify (1)
- Other RI considerations, specify (2)

SG 01.4 Indicate what norms you have used to develop your investment policy that covers your responsible investment approach.

- UN Global Compact Principles
- UN Guiding Principles on Business and Human Rights
- Universal Declaration of Human Rights
- International Bill of Human Rights
- International Labour Organization Conventions
- United Nations Convention Against Corruption
- OECD Guidelines for Multinational Enterprises
- Other, specify (1)

other (1) description
Our RI processes take into account 110 different international norms and conventions, UN Global Compact being the most relevant one.
<input type="checkbox"/> Other, specify (2)
<input type="checkbox"/> Other, specify (3)
<input type="checkbox"/> None of the above

SG 01.5 Describe your organisation's investment principles, and overall investment strategy, and how they consider ESG factors and real economy impact.

The objective of Elo's investment operations is to ensure profitable and sustainable investment of employee pension assets. The investment process is independent and is focused on the long term. Employee pension assets are invested in accordance with the company's investment strategy and policy. The goal is to operate in the investment markets in a way that generates the best possible return for the pension assets in all market conditions at the defined risk level.

The most important aspects:

- Allocation process forms the framework for long-term investment.
- Different asset classes have tested and well defined investment processes and they are rooted into the company's investment strategy.
- In-depth analysis and independent valuation of investment instruments.
- Allocation process is well defined.
- Direct investments are the primary form of investment across different asset classes.
- Investment process is cost-effective and risk management is comprehensive.
- Aim is not to seek quick profits, but rather to focus on long-term investment results.

Responsibility is an integral part of Elo's investment operations and investment risk management. Responsibility includes compliance with legislation and good market practices, commitment to compliance with international agreements concerning human rights, working life and the environment, and responsibility with regard to the society around us.

No

**SG 01.6** Provide a brief description of the key elements, any variations or exceptions to your investment policy that covers your responsible investment approach. [Optional]

Elo's principles for responsible investment are based on corporate social responsibility, accountability to policyholders and the insured. Elo aims for a good, sustainable return on its pension assets over the long term.

Elo's responsibility with regard to investment operations is made up of four areas:

Responsible operating methods, International norms, Responsible investments, Ownership steering and other means of influence.

**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.

Policy setting out your overall approach

URL/Attachment
<input checked="" type="checkbox"/> URL <a href="http://www.elo.fi/about-elo/investments/responsibility-in-elos-investment-operations?sc_lang=en">http://www.elo.fi/about-elo/investments/responsibility-in-elos-investment-operations?sc_lang=en</a>
<input type="checkbox"/> Attachment (will be made public)

Formalised guidelines on environmental factors

Asset class-specific RI guidelines

URL/Attachment
<input checked="" type="checkbox"/> URL <a href="http://www.elo.fi/~media/files/yhtioasiat/___elo_vastuullinen_sijoittaminen_060317.ashx">http://www.elo.fi/~media/files/yhtioasiat/___elo_vastuullinen_sijoittaminen_060317.ashx</a>
<input type="checkbox"/> Attachment (will be made public)

Engagement policy

URL/Attachment
<input checked="" type="checkbox"/> URL <a href="http://www.elo.fi/about-elo/investments/elos-ownership-policy">http://www.elo.fi/about-elo/investments/elos-ownership-policy</a>
<input type="checkbox"/> Attachment (will be made public)

(Proxy) voting policy

URL/Attachment
<input checked="" type="checkbox"/> URL <a href="http://www.elo.fi/about-elo/investments/elos-ownership-policy">http://www.elo.fi/about-elo/investments/elos-ownership-policy</a>
<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 <a href="http://www.elo.fi/about-elo/investments/responsibility-in-elos-investment-operations">http://www.elo.fi/about-elo/investments/responsibility-in-elos-investment-operations</a>
<input type="checkbox"/> Attachment

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

URL/Attachment
<input checked="" type="checkbox"/> URL <a href="http://www.elo.fi/~media/files/yhtioasiat/___elo_sijoitustoiminnan_ilmastrategia_060317.ashx">http://www.elo.fi/~media/files/yhtioasiat/___elo_sijoitustoiminnan_ilmastrategia_060317.ashx</a>
<input type="checkbox"/> Attachment

Processes / approaches to incorporating ESG

URL/Attachment
<input checked="" type="checkbox"/> URL <a href="http://www.elo.fi/~media/files/yhtioasiat/___elo_vastuullinen_sijoittaminen_060317.ashx">http://www.elo.fi/~media/files/yhtioasiat/___elo_vastuullinen_sijoittaminen_060317.ashx</a>
<input type="checkbox"/> Attachment

Governance structure of organisational ESG responsibilities

URL/Attachment	
<input checked="" type="checkbox"/> URL	<a href="http://www.elo.fi/~media/files/yhtioasiat/___elo_vastuullinen_sijoittaminen_060317.ashx">http://www.elo.fi/~media/files/yhtioasiat/___elo_vastuullinen_sijoittaminen_060317.ashx</a>
<input type="checkbox"/> Attachment	

ESG incorporation approaches

URL/Attachment	
<input checked="" type="checkbox"/> URL	<a href="http://www.elo.fi/~media/files/yhtioasiat/___elo_vastuullinen_sijoittaminen_060317.ashx">http://www.elo.fi/~media/files/yhtioasiat/___elo_vastuullinen_sijoittaminen_060317.ashx</a>
<input type="checkbox"/> Attachment	

Active ownership approaches

URL/Attachment	
<input checked="" type="checkbox"/> URL	<a href="http://www.elo.fi/about-elo/investments/elos-ownership-policy">http://www.elo.fi/about-elo/investments/elos-ownership-policy</a>
<input type="checkbox"/> Attachment	

Reporting

URL/Attachment	
<input checked="" type="checkbox"/> URL	<a href="http://www.elo.fi/~media/files/yhtioasiat/___elo_vastuullinen_sijoittaminen_060317.ashx">http://www.elo.fi/~media/files/yhtioasiat/___elo_vastuullinen_sijoittaminen_060317.ashx</a>
<input type="checkbox"/> Attachment	

We do not publicly disclose any investment policy components

**SG 02.3** Indicate if your organisation's investment principles, and overall investment strategy is publicly available

Yes  
<http://www.elo.fi/about-elo/investments>  
 No

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

Some of the documents are not yet translated into english but will be translated in the near future.

**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.

Elo has policies in place regarding transactions with related parties (as defined in relevant laws and regulations as well as Elo's internal rules), conflicts of interest, board participation, insider trading and gifts and entertaining.

No

**SG 04** Voluntary Descriptive General

**SG 04.1** Indicate if your organisation has a process for identifying and managing incidents that occur within portfolio companies.

Private

**SG 04.2** Describe your process on managing incidents

Private

**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 reviewed

**SG 05.2** Additional information. [Optional]

Reviewing the ESG-characteristics of our investments is an ongoing process. We review our processes relating responsible investment annually.

SG 06	Voluntary	Descriptive	General
SG 06.1	List the main responsible investment objectives that your organisation set for the reporting year.		
Private			
SG 06.2	Additional information.		
Private			
SG 07	Mandatory	Core Assessed	General
SG 07.1	Indicate the roles present in your organisation and for each, indicate whether they have oversight and/or implementation responsibilities for responsible investment.		
Roles present in your organisation			
<input checked="" type="checkbox"/> Board members or trustees <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Oversight/accountability for responsible investment</li> <li><input type="checkbox"/> Implementation of responsible investment</li> <li><input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment</li> </ul> <input checked="" type="checkbox"/> Chief Executive Officer (CEO), Chief Investment Officer (CIO), Investment Committee <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Oversight/accountability for responsible investment</li> <li><input type="checkbox"/> Implementation of responsible investment</li> <li><input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment</li> </ul> <input checked="" type="checkbox"/> Other Chief-level staff or head of department, specify <ul style="list-style-type: none"> <li>Every head of asset class</li> <li><input checked="" type="checkbox"/> Oversight/accountability for responsible investment</li> <li><input checked="" type="checkbox"/> Implementation of responsible investment</li> <li><input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment</li> </ul> <input checked="" type="checkbox"/> Portfolio managers <ul style="list-style-type: none"> <li><input type="checkbox"/> Oversight/accountability for responsible investment</li> <li><input checked="" type="checkbox"/> Implementation of responsible investment</li> <li><input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment</li> </ul> <input checked="" type="checkbox"/> Investment analysts <ul style="list-style-type: none"> <li><input type="checkbox"/> Oversight/accountability for responsible investment</li> <li><input checked="" type="checkbox"/> Implementation of responsible investment</li> <li><input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment</li> </ul> <input checked="" type="checkbox"/> Dedicated responsible investment staff <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Oversight/accountability for responsible investment</li> <li><input checked="" type="checkbox"/> Implementation of responsible investment</li> <li><input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment</li> </ul> <input checked="" type="checkbox"/> External managers or service providers <ul style="list-style-type: none"> <li><input type="checkbox"/> Oversight/accountability for responsible investment</li> <li><input checked="" type="checkbox"/> Implementation of responsible investment</li> <li><input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment</li> </ul> <input type="checkbox"/> Investor relations <input type="checkbox"/> Other role, specify (1) <input type="checkbox"/> Other role, specify (2)			
SG 07.2	For the roles for which you have RI oversight/accountability or implementation responsibilities, indicate how you execute these responsibilities.		
All portfolio managers are responsible for taking ESG- issues into account when making investment decisions. A dedicated ESG- person is to help them in a practice. Board members, CEO, CIO and Director of Securities and Director of Unlisted investments have an oversight responsibility for responsible investment and they control via reporting etc. that investment organization is implementing Elo's RI- policy in right manner.			
SG 07.3	Indicate the number of dedicated responsible investment staff your organisation has.		
1			
SG 07.4	Additional information. [Optional]		
One of the portfolio managers is specially focused on developing and coordinating RI issues (a dedicated RI staff).			
SG 08	Voluntary	Additional Assessed	General

SG 08.1	Indicate if your organisation's performance management, reward and/or personal development processes have a responsible investment element.
Private	
SG 08.3	Provide any additional information on your organisation's performance management, reward and/or personal development processes in relation to responsible investment.
Private	
SG 08.4	Describe the level of experience board members/trustees/chief-level staff have with incorporating ESG factors into investment decision-making processes.
Private	

SG 09	Mandatory	Core Assessed	PRI 4,5
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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.
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Principles for Responsible Investment

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

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

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

CDP Forests

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

CDP Water

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

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

Finland's Sustainable Investment Forum, FINSIF

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

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
Board member and member of the Nomination Committee

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

Securities Markets Association of Finland

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

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
Elo's CIO is a member of Market Practice Board of Securities Markets Association

- Other collaborative organisation/initiative, specify

The Finnish Pension Alliance TELA

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]
We co-operate with our head organisation for industry (The Finnish Pension Alliance TELA, www.tela.fi) for unified standards.

- Other collaborative organisation/initiative, specify

Directors' Institute Finland

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

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
Elo is a member of Directors' Institute Finland, DIF

- Other collaborative organisation/initiative, specify

SG 10	Mandatory	Core Assessed	PRI 4
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SG 10.1	Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.
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- Yes

SG 10.2	Indicate which of the following actions your organisation has taken to promote responsible investment, independently of collaborative initiatives.
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- Provided or supported education or training programmes for clients, investment managers, broker/dealers, investment consultants, legal advisers or other investment organisations
- Provided financial support for academic or industry research on responsible investment
- Encouraged better transparency and disclosure of responsible investment practices across the investment industry
- 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
- Wrote articles on responsible investment in the media.
- Other, specify

- No

SG 11	Voluntary	Additional Assessed	PRI 4,5,6
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SG 11.1	Indicate if your organisation - individually or in collaboration with others - conducted dialogue with public policy makers or regulators in support of responsible investment in the reporting year.
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Private

SG 11.4	Provide a brief description of the main topics your organisation has engaged with public policy-makers or regulators on.
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Private

SG 12	Mandatory	Descriptive	PRI 1
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SG 12.1	Indicate if your organisation executes scenario analysis and/or modelling in which the risk profile of future ESG trends at portfolio level is calculated.
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- We execute scenario analysis which includes factors representing the investment impacts of future environmental trends
- We execute scenario analysis which includes factors representing the investment impacts of future social trends
- We execute scenario analysis which includes factors representing the investment impacts of future governance trends
- We execute other scenario analysis, specify
- We do not execute such scenario analysis and/or modelling

SG 12.2	Indicate if your organisation considers ESG issues in strategic asset allocation and/or allocation of assets between sectors or geographic markets.
	<input type="radio"/> We do the following <input checked="" type="radio"/> We do not consider ESG issues in strategic asset allocation

SG 12.3	Additional information. [OPTIONAL]
We conducted a scenario analysis on carbon price increase for European companies.	

SG 13	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1
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SG 13.1	Some investment risks and opportunities arise as a result of long term trends. Indicate which of the following you act on.
Private	

SG 13.5	Additional information [Optional]
Private	

SG 14	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1
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SG 14.1	Indicate if your organisation allocates assets to, or manages, funds based on specific environmental and social themed areas.
Private	

SG 14.3	Additional Information [Optional]
Private	

SG 15	Mandatory	Descriptive	General
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SG 15.1	Describe how you address ESG issues for internally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.
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Asset Class	Describe what processes are in place and the outputs or outcomes achieved
Private equity	Responsible investment principles are applied throughout the whole investment process. Own independent analysis of the company is always conducted at the pre-investment stage to make sure that the company meets our investment quality standards. Responsibility is emphasized in our criterias and processes. Companies' responsibility, environmental aspects, independence and experience of the Board and that the company is managed according to corporate governance principles are analysed among other things. Companies are followed up and monitored continuously.
Inclusive finance	ESG can best be addressed at an early stage of the project when we evaluate the financial project and do a comprehensive analysis of the company. Responsibility is emphasized in credit granting and processes. In addition, Elo's policyholders have the right to get a loan. Portfolio companies' responsibility including environmental aspects, Governments' experience, professionalism and independence as well as the treatment and safety of workers are factors, which are explained as part of the credit approval. The company's environmental risk analysis is included as part of the analysis, as well as collateral management.

SG 16	Mandatory	Descriptive	General
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SG 16.1	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.
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Asset Class	Describe what processes are in place and the outputs or outcomes achieved
Hedge funds	ESG issues are integrated into all our investment processes including hedge funds. We put lot of emphasis on Operational Due Diligence when conducting manager selection. ESG issues supplement our overall analysis of an individual manager. We feel that Governance issues are the most prevalent. Environmental and Social aspects are equally important but far more difficult to analyze with the same degree of confidence. This is because vast majority of hedge funds in our portfolio utilize high turnover of underlying securities and they use derivative instruments extensively. Our strict hedge fund investment strategy deviates significantly from traditional market indices. Activist and Equity long/short investment strategies have relatively small weight in our portfolio. These strategies have traditionally exhibited the majority of ESG issues in investors' hedge fund portfolios. We take our fiduciary duty very seriously. We extend Governance also to the way how we invest in hedge funds and conduct business with our counterparties. We analyze each and every hedge fund managers business model. Specifically compensation schemes, risk management, board of directors' independence, insider trading rules etc.
Forestry	Investments in infrastructure are often associated with the exploitation of people's basic needs (such as clean water and heat) or natural resources. Infrastructure, forest and agricultural land are direct or indirect investments. Our aim is that >50% of infra and real asset investments have a positive impact to environment or society by 2025 and thus they would be aligned with the UN's Sustainable Development Goals. We calculate our forest investments carbon sink which is the positive impact to environment.

SG 17	Voluntary	Descriptive	General
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SG 17.1	Indicate whether any specific features of your approach to responsible investment are particularly innovative.
Private	

SG 17.3	Additional information.
Private	

SAM 01	Mandatory	Core Assessed	PRI 4
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SAM 01.1	Indicate whether your organisation uses investment consultants and/or fiduciary managers.
<input type="checkbox"/> Yes, we use investment consultants <input type="checkbox"/> Yes, we use a fiduciary manager that delegates management of some or all of our assets to third-party managers. <input checked="" type="checkbox"/> No, we do not use investment consultants or fiduciary managers.	

SAM 02	Mandatory	Gateway	PRI 1
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SAM 02.1	Indicate for which of the following externally managed asset classes your organisation, and/or your investment consultants, consider responsible investment factors in investment manager: (a) Selection, (b) Appointment (investment management agreements/contracts), and (c) Monitoring
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Asset classes	(a) Selection	(b) Appointment	(c) Monitoring
Listed equity	<input checked="" type="checkbox"/> Selection	<input type="checkbox"/> Appointment	<input checked="" type="checkbox"/> Monitoring
Fixed income - SSA	<input checked="" type="checkbox"/> Selection	<input type="checkbox"/> Appointment	<input checked="" type="checkbox"/> Monitoring
Fixed income - Corporate (financial)	<input checked="" type="checkbox"/> Selection	<input type="checkbox"/> Appointment	<input checked="" type="checkbox"/> Monitoring
Fixed income - Corporate (non-financial)	<input checked="" type="checkbox"/> Selection	<input type="checkbox"/> Appointment	<input checked="" type="checkbox"/> Monitoring
Private equity	<input checked="" type="checkbox"/> Selection	<input type="checkbox"/> Appointment	<input checked="" type="checkbox"/> Monitoring
Property	<input checked="" type="checkbox"/> Selection	<input type="checkbox"/> Appointment	<input checked="" type="checkbox"/> Monitoring
Infrastructure	<input checked="" type="checkbox"/> Selection	<input type="checkbox"/> Appointment	<input checked="" type="checkbox"/> Monitoring

SAM 02.2	Provide a brief description of how your organisation includes responsible investment considerations in your investment manager selection, appointment and monitoring processes.
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Fixed income credit, equity and PE: Our DD questionnaire includes a section devoted to ESG issues. We ask the fund manager to provide wide range of information on their stance towards ESG issues, ie. do they have a written policy on responsible investing or ESG- issues, is it integrated to their processes, whether they have an engagement policy, are they reporting ESG related risks / opportunities to their investors and so on. Also, we interview fund managers on ESG- practices and integration. In addition we analyze underlying holdings of each fund, and if we find controversies related to specific companies, we will discuss them with the manager.

We don't have any segregated mandates for external funds and therefore only rational phases for RI- considerations are selection and monitoring and not appointment. RI- considerations in appointment would only be possible for segregated mandates where an investor has a right to include additional requirements e.g. for ESG.

SAM 03	Mandatory to Report, Voluntary to Disclose	Gateway	General
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SAM 03.1	Provide a breakdown of your externally managed listed equities and fixed income by passive, active quant and, active fundamental and other active strategies.
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Private

SAM 03.2	Additional information [Optional].
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Private

SAM 04	Mandatory	Gateway	PRI 1,2
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SAM 04.1	Indicate which of the following ESG incorporation strategies you require your external manager(s) to implement on your behalf:
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Active investment strategies
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Active investment strategies	Listed Equity	FI - SSA	FI - Corporate (financial)?	FI - Corporate (non-financial)?
Screening	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Thematic	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Integration	<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"/>

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

**SAM 04.2** Explain how you integrate ESG factors in the selection, appointment and monitoring of your passive funds

In passive funds we monitor specific ESG- issues.

**SAM 04.3** Additional information. [Optional]

Fixed income credit investments: We have one specifically ESG- oriented fund. Generally speaking we encourage fund managers to consider ESG- issues as a part of company analysis to capture risks and opportunities of companies also outside of financial statement. The rationale of ESG- integration is that responsible behaving companies have better opportunities to perform better in a long run.

**SAM 05** Mandatory Core Assessed PRI 1

**SAM 05.1** 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)?	Private equity	Property	Infrastructure
Investment strategy and how ESG objectives relate to it	<input checked="" type="checkbox"/>						
ESG incorporation requirements	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ESG reporting requirements	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other	<input type="checkbox"/>						
No RI information covered in the RFPs	<input type="checkbox"/>						

**SAM 05.2** 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)?	Private equity	Property	Infrastructure
Assess the time horizon of the investment manager's investment strategy	<input checked="" type="checkbox"/>						
Assess the quality of investment policy and its reference to ESG	<input checked="" type="checkbox"/>						
Assess the investment approach and how ESG objectives are implemented in the investment process (asset class specific)	<input checked="" type="checkbox"/>						
Assess the ESG definitions to be used	<input type="checkbox"/>						
Other	<input type="checkbox"/>						
None of the above	<input type="checkbox"/>						

**ESG people/oversight**

	LE	FI - SSA	FI - Corporate (financial)?	FI - Corporate (non-financial)?	Private equity	Property	Infrastructure
Assess ESG expertise of investment teams	<input checked="" type="checkbox"/>						
Review the ownership of the ESG implementation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Review how is ESG implementation enforced /ensured	<input checked="" type="checkbox"/>						
Other	<input type="checkbox"/>						
None of the above	<input type="checkbox"/>						

**Process/portfolio construction/investment valuation**

	LE	FI - SSA	FI - Corporate (financial)?	FI - Corporate (non-financial)?	Private equity	Property	Infrastructure
Review the process ensuring the quality of the ESG data used	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Review and agree the investment decision making process (and ESG data use in it)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Review and agree the ESG incorporation strategy impact of ESG analysis on investment decisions	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Review and agree how the manager is targeting returns and ESG objectives	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Review and agree how the manager identifies, measures and manages ESG risk	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Review and agree return and risk in combination at a portfolio level (portfolio construction) and ESG objectives	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Review how ESG materiality is evaluated by the manager in the monitored period	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other, specify	<input type="checkbox"/>						
None of the above	<input type="checkbox"/>						

**SAM 05.3** Describe the selection process

- Review responses to RfP, RfI, DDQ etc.
- Review Limited Partners' Responsible Investment Due Diligence Questionnaire (PE DDQ)
- Review publicly available information
- Review assurance process
- Review PRI Transparency Reports
- Request and discuss PRI Assessment Reports
- Meetings with the potential shortlisted managers
- Site visits to potential managers offices
- Other, specify

**SAM 05.4** When selecting external managers does your organisation set any of the following:

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

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

When selecting external managers we assess the manager's overall approach towards RI. We prefer managers that are UNPRI signatories and have a integrated ESG strategy.

**SAM 06** Mandatory Additional Assessed PRI 2

**SAM 06.1** Indicate how your organisation typically evaluates the manager's active ownership practices in the majority of the manager.

Engagement			
	FI - SSA	FI - Corporate (financial)?	FI - Corporate (non-financial)?
Review the manager's engagement policy	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Review the manager's engagement process (with examples and outcomes)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ensure that engagement outcomes feed back into the investment decision-making process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other engagement issues in your selection process specify	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**SAM 06.2** Describe how you assess if the manager's engagement approach is effective.

- Impact on investment decisions
- Impact on company / asset level
- Impact on ESG profile or the portfolio
- Evidence of changes in corporate practices
- Other, specify
- None of the above

**SAM 08** Mandatory Core Assessed PRI 1

**SAM 08.1** When monitoring managers, indicate which of the following types of responsible investment information your organisation typically reviews and evaluates from the investment manager in meetings/calls

	LE	FI - SSA	FI - Corporate (financial)?	FI - Corporate (non-financial)?	Private equity	Property	Infrastructure
ESG objectives linked to investment strategy	<input checked="" type="checkbox"/>						
Investment restrictions and any controversial investment decisions	<input checked="" type="checkbox"/>						
ESG incorporation objectives (with examples)	<input type="checkbox"/>						
ESG portfolio characteristics	<input type="checkbox"/>						
How ESG materiality has been evaluated by the manager in the monitored period	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Information on any ESG incidents	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Metrics on the real economy influence of the investments	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PRI Transparency Reports	<input type="checkbox"/>						
PRI Assessment Reports	<input type="checkbox"/>						
Other general RI considerations in investment management agreements; specify	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
None of the above	<input type="checkbox"/>						

If you select any 'Other' option(s), specify  
 PE & Infra: fund manager's own RI-reports and case studies

**SAM 08.2** 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)?	Private equity	Property	Infrastructure
ESG score	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
ESG weight	<input type="checkbox"/>						
Real world economy targets	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other RI considerations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
None of the above	<input type="checkbox"/>	<input checked="" type="checkbox"/>					

If you select any 'Other' option(s), specify  
 LE and FI: We monitor broadly managers' practices regarding ESG. When possible we monitor also portfolios underlying holdings.  
 Infra: The followup varies case by case.

**SAM 09** Mandatory Additional Assessed PRI 1

**SAM 09.1** 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			
	FI - SSA	FI - Corporate (financial)?	FI - Corporate (non-financial)?
Report on engagements undertaken (outcomes and examples)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Account on engagement ESG impacts	<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"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you select any 'Other' option(s), specify  
 In DD questionnaires we ask managers' processes regarding engagement and ownership practices.

**SAM 11** Mandatory to Report, Voluntary to Disclose Descriptive PRI 1

SAM 11.1	Indicate approximately what percentage (+/- 5%) of your externally managed assets are managed by PRI signatories.
Private	
SAM 11.2	Describe how you ensure that best RI practice is applied to managing your assets
Private	
SAM 11.3	Additional information. [Optional]
Private	

SAM 12	Mandatory	Additional Assessed	PRI 1,6
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SAM 12.1	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.
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Add Example 1

Topic or issue	Fund manager ESG- meeting in Asia
Conducted by	Internal staff
Asset class	Listed Equity
Scope and process	Our internal staff met the portfolio management team of one of our active equity funds in Asia to discuss deeply about ESG- processes and the scale they integrate ESG- issues in to their investment processes. We asked lot of questions around specific ESG- matters and asked them to give us some examples on those matters.
Outcomes	We got a good overall picture how they integrate ESG in Asian companies and had a good discussion. By having this specific ESG- meeting helped us to understand the fund managers' perspectives regarding ESG and how they weight specific ESG- matters in their company analysis and company meetings.

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

SAM 13	Mandatory	Core Assessed	PRI 6
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SAM 13.1	Indicate if your organisation proactively discloses any information about responsible investment considerations in your indirect investments.
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Yes, we disclose information publicly

[http://www.elo.fi/~media/files/yhtioasiat/\\_\\_\\_elo\\_vastuullinen\\_sijoittaminen\\_060317.ashx](http://www.elo.fi/~media/files/yhtioasiat/___elo_vastuullinen_sijoittaminen_060317.ashx)

SAM 13.2	Indicate if the level of information you disclose to the public is the same as that disclosed to clients and/or beneficiaries.
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Yes

SAM 13.3	Indicate what type of information your organisation proactively discloses to the public and clients and/or beneficiaries about your indirect investments.
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- 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 active ownership
- Other, specify

How many of our indirect investment managers have signed PRI. We calculate and disclose the carbon footprint of indirect equities as well.

No

- Yes, we disclose information to clients/beneficiaries only
- We do not proactively disclose information to the public and/or clients/beneficiaries

LEI 01	Mandatory to Report, Voluntary to Disclose	Gateway	General
LEI 01.1	Provide a breakdown of your internally managed listed equities by passive, active - quantitative (quant), active - fundamental and active - other strategies.		
Private			
LEI 01.2	Additional information. [Optional]		
Private			
LEI 03	Mandatory	Gateway	PRI 1
LEI 03.1	Indicate (1) which ESG incorporation strategy and/or combination of strategies you apply to your actively managed listed equities and (2) the breakdown of your actively managed listed equities by strategy or combination of strategies (+/- 5%)		
<input type="checkbox"/> Screening alone (i.e. not combined with any other strategies) <input type="checkbox"/> Thematic alone (i.e. not combined with any other strategies) <input type="checkbox"/> Integration alone (i.e. not combined with any other strategies) <input type="checkbox"/> Screening and Integration strategies <input type="checkbox"/> Thematic and integration strategies <input type="checkbox"/> Screening and thematic strategies <input checked="" type="checkbox"/> All three strategies combined			
		Percentage of active listed equity to which the strategy is applied	100%
<input type="checkbox"/> We do not apply incorporation strategies			
LEI 03.2	Describe your organisation's approach to incorporation and the reasons for choosing the particular ESG incorporation strategy/strategies.		
Integration is our core strategy for ESG but we also do screening (e.g. norms based screening, positive and negative screening based on various ESG-criteria) and thematic research on direct equities. By combining these different types of ESG- incorporation strategies we want to make sure we have an overall picture of the companies' ESG- risks and opportunities.			
LEI 03.3	Where assets are managed using a combination of ESG incorporation strategies, briefly describe how these combinations are used. [Optional]		
We use an international service provider to provide us information about any violations of international norms. On yearly basis we select a theme where we'll do our own intensive analysis. ESG- integration is done taking ESG- issues into consideration in every investment decision by portfolio managers.			
LEI 04	Voluntary	Additional Assessed	PRI 1
LEI 04.1	Indicate what ESG information you use in your ESG incorporation strategies and who provides this information.		
Private			
LEI 04.2	Provide a brief description of the ESG information used, highlighting any differences of sources of information across your ESG incorporation strategies.		
Private			
LEI 04.3	Indicate if you incentivise brokers to provide ESG research.		
Private			
LEI 04.5	Additional information.[Optional]		
Private			
LEI 05	Voluntary	Additional Assessed	PRI 1
LEI 05.1	Indicate if your organisation has a process through which information derived from ESG engagement and/or (proxy) voting activities is made available for use in investment decision-making.		
Private			
LEI 05.2	Additional information. [Optional]		
Private			
LEI 06	Mandatory	Descriptive	PRI 1
LEI 06.1	Indicate and describe the type of screening you apply to your internally managed active listed equities.		
<input checked="" type="checkbox"/> Negative/exclusionary screening <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Product</li> <li><input type="checkbox"/> Activity</li> <li><input type="checkbox"/> Sector</li> <li><input type="checkbox"/> Country/geographic region</li> <li><input checked="" type="checkbox"/> Environmental and social practices and performance</li> <li><input checked="" type="checkbox"/> Corporate governance</li> </ul>			
		Description	

Controversial weapons, Climate change related e.g. CO2- emissions, international norms and conventions e.g. Global Compact

- Positive/best-in-class screening
  - Product
  - Activity
  - Sector
  - Country/geographic region
  - Environmental and social practices and performance
  - Corporate governance

Description
Positive environmental and social impact, Climate change related e.g. CO2- emissions

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

Our norms- based screening covers about 120 different international norms and conventions.

Description
Norms- based screening of International norms and conventions include issues both in social, environmental and governance topics.

LEI 06.2	Describe how the screening criteria are established, how often the criteria are reviewed and how you notify clients and/or beneficiaries when changes are made.
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Our approach addresses both ESG- risks and opportunities. Criteria review is an ongoing process and we publish our main ESG- criteria to public (incl.clients) on our Responsible Investment- document.

LEI 07	Mandatory	Core Assessed	PRI 1
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LEI 07.1	Indicate which processes your organisation uses to ensure screening is based on robust analysis.
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- Comprehensive ESG research is undertaken or sourced to determine companies' activities and products.
- Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- External research and data used to identify companies to be excluded/included is subject to internal audit by ESG/RI staff, the internal audit function or similar
- Company ESG information/ratings are updated regularly to ensure that portfolio holdings comply with fund policies
- A committee or body with representatives independent of the individuals who conduct company research reviews some or all screening decisions
- A periodic review of the quality of the research undertaken or provided is carried out
- Other, specify
- None of the above

LEI 08	Voluntary	Additional Assessed	PRI 1
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LEI 08.1	Indicate which processes your organisation uses to ensure fund criteria are not breached
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Private

LEI 08.2	If breaches of fund screening criteria are identified - describe the process followed to correct those breaches.
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Private

LEI 08.3	Additional information.[Optional]
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Private

LEI 09	Mandatory	Descriptive	PRI 1
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LEI 09.1	Indicate the type of sustainability thematic funds or mandates your organisation manages.
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- Environmentally themed funds
- Socially themed funds
- Combination of themes

LEI 09.2	Describe your organisation's processes for sustainability themed funds. [Optional]
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We don't have a specific fund for sustainable theme. Instead we have a proader sustainability theme for our investments. Our objective is that by 2025, more than half of our invesments (direct equity and credit invesments and all infrastructure invesments) will have a measurable positive impact on the environment or society.

LEI 10	Mandatory	Core Assessed	PRI 1
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LEI 10.1	Indicate if E, S and G issues are reviewed while researching companies and/or sectors in active strategies.
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ESG issues	Coverage/extent of review on these issues
Environmental	<p><b>Environmental</b></p> <p><input checked="" type="checkbox"/> We systematically review the potential significance of environmental issues and investigate them accordingly</p> <p><input type="checkbox"/> We occasionally review the potential significance of environmental issues and investigate them accordingly</p> <p><input type="checkbox"/> We do not review environmental issues</p>
Social	<p><b>Social</b></p> <p><input checked="" type="checkbox"/> We systematically review the potential significance of social issues and investigate them accordingly</p> <p><input type="checkbox"/> We occasionally review the potential significance of social issues and investigate them accordingly</p> <p><input type="checkbox"/> We do not review social issues</p>
Corporate Governance	<p><b>Corporate Governance</b></p> <p><input checked="" type="checkbox"/> We systematically review the potential significance of corporate governance issues and investigate them accordingly</p> <p><input type="checkbox"/> We occasionally review the potential significance of corporate governance issues and investigate them accordingly</p> <p><input type="checkbox"/> We do not review corporate governance issues</p>

**LEI 10.2** Additional information. [Optional]

ESG- issues are taken into a account in every investment decision and analysis.

**LEI 11** Voluntary Additional Assessed PRI 1

**LEI 11.1** Indicate which processes your organisation uses to ensure ESG integration is based on a robust analysis.

Private

**LEI 11.2** Describe how ESG information is held and used by your portfolio managers.

Private

**LEI 11.3** Additional information.[Optional]

Private

**LEI 12** Mandatory to Report, Voluntary to Disclose Core Assessed PRI 1

**LEI 12.1** Indicate which aspects of investment analysis you integrate ESG information into.

Private

**LEI 12.5** Additional information.

Private

**LEI 13** Mandatory to Report, Voluntary to Disclose Descriptive PRI 1

**LEI 13.1** Indicate if you manage passive listed equity funds that incorporate ESG issues in the index construction methodology.

Private

**LEI 14** Voluntary Descriptive PRI 1

**LEI 14.1** Indicate how your ESG incorporation strategies have influenced the composition of your portfolio(s) or investment universe.

Private

**LEI 14.2** Additional information.[Optional]

Private

**LEI 15** Voluntary Additional Assessed PRI 1

**LEI 15.1** Indicate whether your organisation measures how your approach to ESG issues in listed equity investments has affected financial and/or ESG performance.

Private

**LEI 15.2** Describe how you are able to determine these outcomes.

Private

**LEI 17** Mandatory Core Assessed PRI 2,6

**LEI 17.1** Indicate if your organisation proactively discloses information on your approach to ESG incorporation in listed equity.

We disclose it publicly

<http://www.elo.fi/tietoa-elosta/sijoitukset/elon-vastuullisuus-sijoitustoiminnassa>

**LEI 17.2** Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.

Yes

**LEI 17.3** Indicate the information your organisation proactively discloses to clients/ beneficiaries and the public regarding your approach to ESG incorporation.

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

**LEI 17.4** Indicate how frequently you typically report this information.

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

No

- We disclose it to clients and/or beneficiaries only
- We do not proactively disclose it to the public and/or clients/beneficiaries

**LEI 17.7** Additional information. [Optional]

Our responsible investing documents including climate strategy and ownership policy can be found continuously on our web page. They are updated when needed.

LEA 01	Mandatory	Core Assessed	PRI 2
LEA 01.1	Indicate whether your organisation has a formal engagement policy.		
<input checked="" type="radio"/> Yes			
LEA 01.2	Indicate what your engagement policy covers:		
<input checked="" type="checkbox"/> Conflicts of interest <input checked="" type="checkbox"/> Prioritisation of engagements <input checked="" type="checkbox"/> Transparency <input checked="" type="checkbox"/> Environmental factors <input checked="" type="checkbox"/> Social factors <input checked="" type="checkbox"/> Governance factors <input type="checkbox"/> Engagements following on from decisions <input type="checkbox"/> Other, describe <input type="checkbox"/> None of the above			
LEA 01.3	Attach or provide a URL to your engagement policy. [Optional]		
LEA 01.4	Provide a brief overview of your organization's approach to engagement		
<p>Elo considers annual general meetings and the preparatory work for these meetings, along with regular meetings with company managements, to be the most important mean to influence. Elo attends the general meetings in Finland directly by itself and outside Finland through a service provider which is provided with clear instructions regarding Elo's objective before the meeting. Insights of Elo's engagement activities can be found from Elo's responsible investment document and ownership policy (on Elo's web page).</p>			
<input type="radio"/> No			

LEA 02	Mandatory	Gateway	PRI 1,2,3								
LEA 02.1	Indicate the method of engagement, giving reasons for the interaction.										
<table border="1"> <thead> <tr> <th>Type of engagement</th> <th>Reason for interaction</th> </tr> </thead> <tbody> <tr> <td>Individual/Internal staff engagements</td> <td> <input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues  <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure  <input type="checkbox"/> Other, specify  <input type="checkbox"/> We do not engage via internal staff                 </td> </tr> <tr> <td>Collaborative engagements</td> <td> <input type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues  <input type="checkbox"/> To encourage improved/increased ESG disclosure  <input type="checkbox"/> Other, specify  <input checked="" type="checkbox"/> We do not engage via collaborative engagements                 </td> </tr> <tr> <td>Service provider engagements</td> <td> <input type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues  <input type="checkbox"/> To encourage improved/increased ESG disclosure  <input type="checkbox"/> Other, specify  <input checked="" type="checkbox"/> We do not engage via service providers                 </td> </tr> </tbody> </table>				Type of engagement	Reason for interaction	Individual/Internal staff engagements	<input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> Other, specify <input type="checkbox"/> We do not engage via internal staff	Collaborative engagements	<input type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues <input type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> Other, specify <input checked="" 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) on ESG issues <input type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> Other, specify <input checked="" type="checkbox"/> We do not engage via service providers
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Service provider engagements	<input type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues <input type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> Other, specify <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 engagement activities carried out by internal staff.		
<input checked="" type="radio"/> Yes			
LEA 03.2	Describe the criteria used to identify and prioritise engagement activities carried out by internal staff.		
<input type="checkbox"/> Geography/market of the companies targeted <input checked="" type="checkbox"/> Materiality of ESG factors <input type="checkbox"/> Systemic risks to global portfolios <input checked="" type="checkbox"/> Exposure (holdings) <input checked="" type="checkbox"/> In reaction to ESG impacts which has already taken place <input type="checkbox"/> As a response to divestment pressure <input type="checkbox"/> As a follow-up from a voting decision <input type="checkbox"/> Client request <input type="checkbox"/> Other, describe			
<input type="radio"/> No			

LEA 04	Mandatory	Core Assessed	PRI 2
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**LEA 04.1** Indicate if you define specific objectives for your engagement activities.

- Yes
  - Yes, for all engagement activities
  - Yes, for the majority of engagement activities
  - Yes, for a minority of engagement activities
- We do not define specific objectives for engagement activities carried out by internal staff.

**LEA 04.2** Indicate if you monitor the actions that companies take following your engagements.

- Yes
  - Yes, in all cases
  - Yes, in the majority of cases
  - Yes, in the minority of cases
- We do not monitor the actions that companies take following engagement activities carried out by internal staff.

**LEA 04.3** Indicate whether your organisation defines milestones and goals for engagement activities carried out by internal staff.

Yes

**LEA 04.4** Indicate if you do any of the following to monitor and evaluate the progress of your engagement activities carried out by internal staff.

- Define timelines for milestones and goals
  - Tracking, monitoring progress against defined milestones and goals
  - Establish a process for when the goals are not met
  - Revisit and, if necessary revise goals on continuous basis
  - Other, please specify
- No

**LEA 04.5** Additional information. [Optional]

The goals and objectives for engagements are defined depending on the current situation. It can be discussion of material ESG- issues or information gathering in company meetings. In a case of ESG- violation we proceed in line with our internal guidelines and start communicating with the company to gather information from the situation. We keep track of any activities and companys responses, objectives and actions made. The insights from engagements are always known by the portfolio managers in order to incorporate the information into investment decision- making at that time and also in the future.

LEA 09	Voluntary	Additional Assessed	PRI 1,2
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**LEA 09.1** Indicate if insights gained from your engagements are shared with your internal or external investment managers.

Private

**LEA 09.2** Additional information. [Optional]

Private

LEA 10	Mandatory	Gateway	PRI 2
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**LEA 10.1** Indicate if you track the number of engagements your organisation participates in.

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

LEA 11	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 2
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**LEA 11.1** Indicate the amount of your listed equities portfolio with which your organisation engaged during the reporting year.

Private

**LEA 11.2** Indicate the proportion of engagements that involved multiple, substantive and detailed discussions or interactions with a company during the reporting year relating to ESG issue.

Private

**LEA 11.5** Additional information. [Optional]

Private

LEA 12	Voluntary	Additional Assessed	PRI 2
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LEA 12.1	Indicate which of the following your engagement involved.		
Private			
LEA 12.2	Additional information. [Optional]		
Private			
LEA 13	Voluntary	Additional Assessed	PRI 2
LEA 13.1	Indicate if your engagements in the reporting year covered E, S and/or G issues, providing an estimation of the breakdown.		
Private			
LEA 13.2	Additional information. [optional]		
Private			
LEA 14	Voluntary	Descriptive	PRI 2
LEA 14.1	Indicate whether you track the number of cases during the reporting year where a company changed its practices, or made a formal commitment to do so, following your organisation's and/or your service provider's engagement activities.		
Private			
LEA 14.3	Additional information [Optional].		
Private			
LEA 16	Mandatory	Core Assessed	PRI 2,6
LEA 16.1	Indicate whether your organisation proactively discloses information on its engagements.		
<input type="radio"/> We disclose it publicly <input type="radio"/> We disclose it to clients and/or beneficiaries only <input checked="" type="radio"/> We do not proactively disclose it to the public and/or clients/beneficiaries.			
LEA 16.8	Additional information. [Optional]		
We keep book of the information on our engagements but we do not disclose those publicly or to clients.			
LEA 17	Mandatory	Gateway	PRI 1,2,3
LEA 17.1	Indicate whether your organisation has a formal voting policy.		
<input checked="" type="checkbox"/> Yes			
LEA 17.2	Indicate what your voting policy covers:		
<input type="checkbox"/> Conflicts of interest <input type="checkbox"/> Prioritisation of voting activities <input checked="" type="checkbox"/> Transparency <input checked="" type="checkbox"/> Decision making processes <input type="checkbox"/> Environmental factors <input type="checkbox"/> Social factors <input checked="" type="checkbox"/> Governance factors <input type="checkbox"/> Filing/co-filing resolutions <input type="checkbox"/> Extraordinary meetings <input type="checkbox"/> Share blocking <input type="checkbox"/> Regional voting practices <input type="checkbox"/> Record keeping <input type="checkbox"/> Company dialogue pre/post vote <input type="checkbox"/> Securities lending process <input type="checkbox"/> Other, describe <input type="checkbox"/> None of the above			
LEA 17.3	Attach or provide a URL to your voting policy. [Optional]		
<a href="http://www.elo.fi/about-elo/investments/elos-ownership-policy">http://www.elo.fi/about-elo/investments/elos-ownership-policy</a>			
LEA 17.4	Provide a brief overview of your organization's approach to (proxy) voting.		
Elo primarily exercises its ownership policy in three ways: by participating in the general meetings of the companies in which it holds an interest, engaging in dialogue with company management and participating companies' nomination committees. Elo attends the general meetings of companies listed in Finland in person and by proxy outside of Finland through a partner that is provided with clear instructions regarding Elo's objectives before the meeting.			
LEA 17.5	Provide an overview of how you ensure your voting policy is adhered to, giving details of your approach when exceptions to the policy are made (if applicable).		
We always do the voting decisions by our selves and thus we make sure that our voting policy is applied. Elo's ownership policy steering group provides guidance on AGM practices.			

No

LEA 18	Mandatory	Descriptive	PRI 2
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**LEA 18.1** 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 provider(s) that make voting recommendations or provide research that we use to inform our voting decisions.

**Based on**

- the service provider voting policy signed off by us
- our own voting policy
- our clients' requests or policy
- other, explain

- We hire service provider(s) that make voting decisions on our behalf, except for some pre-defined scenarios for which we review and make voting decisions.
- We hire service provider(s) that make voting decisions on our behalf.

**LEA 18.2** Additional information.[Optional]

In Finland we use our own research and make voting decisions without the use of service providers. Outside of Finland we use our service provider to provide us broadly information about the company history of each ballot item and information regarding e.g. specific sector or country. We use this information combined with our own experience and knowledge to form our decision for voting activity which complies with our voting policy.

LEA 21	Voluntary	Additional Assessed	PRI 2
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**LEA 21.1** Indicate if your organisation has a securities lending programme.

Private

LEA 22	Mandatory	Core Assessed	PRI 2
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**LEA 22.1** Indicate whether you or the service providers acting on your behalf raise any concerns with companies ahead of voting

- Yes, in most cases
- Sometimes, in the following cases:
  - Votes for selected markets
  - Votes relating to certain ESG issues
  - Votes for significant shareholdings
  - Votes for companies we are engaging with
  - On request by clients
  - Other
- Neither we nor our service provider raise concerns with companies ahead of voting

**LEA 22.2** Indicate whether you and/or the service provider(s) acting on your behalf, communicate the rationale to companies, when , you abstain or vote against management recommendations.

- Yes, in most cases
- Sometimes, in the following cases.
- We do not communicate the rationale to companies
- Not applicable because we and/or our service providers do not abstain or vote against management recommendations

**LEA 22.3** Additional information. [Optional]

In such a case we usually pursue to interact with the company before the AGM regarding our ownership policy. With this practice we aim to change the proposal to be in line with our policy. We have published our ownership policy on our website and it is available easily also to company management and board members.

LEA 23	Mandatory	Core Assessed	PRI 2
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**LEA 23.1** For listed equities where you and/or your service provider have the mandate to issue (proxy) voting instructions, indicate the percentage of votes cast during the reporting year.

- We do track or collect this information

<b>Votes cast (to the nearest 1%)</b>
98%

**Specify the basis on which this percentage is calculated**

- of the total number of ballot items on which you could have issued instructions

- of the total number of company meetings at which you could have voted
- of the total value of your listed equity holdings on which you could have voted

**LEA 23.2** Explain your reason(s) for not voting certain holdings

- Shares were blocked
- Notice, ballots or materials not received in time
- Missed deadline
- Geographical restrictions (non-home market)
- Cost
- Conflicts of interest
- Holdings deemed too small
- Administrative impediments (e.g., power of attorney requirements, ineligibility due to participation in share placement)
- We do not vote on environmental resolutions
- We do not vote on social resolutions
- On request by clients
- Other

We do not track or collect this information

**LEA 23.3** Additional information. [Optional]

In Finland we attended almost 100% in AGM's. We vote in actively managed equities.

**LEA 24** Mandatory Additional Assessed PRI 2

**LEA 24.1** Indicate if you track the voting instructions that you and/or your service provider on your behalf have issued.

Yes, we track this information

**LEA 24.2** Of the voting instructions that you and/or third parties on your behalf issued, indicate the proportion of ballot items that were:

Voting instructions	Breakdown as percentage of votes cast
For (supporting) management recommendations	99%
Against (opposing) management recommendations	1%
Abstentions	0%

No, we do not track this information

**LEA 25** Voluntary Descriptive PRI 2

**LEA 25.1** Indicate if your organisation directly or via a service provider filed or co-filed any ESG shareholder resolutions during the reporting year.

Private

**LEA 25.6** Additional information. [Optional]

Private

**LEA 27** Mandatory Core Assessed PRI 2,6

**LEA 27.1** Indicate if your organisation proactively discloses information on your voting activities.

- We disclose it publicly
- We disclose it to clients/beneficiaries only
- We do not proactively disclose our voting activities to the public and/or to clients/beneficiaries

**LEA 27.8** Additional information. [Optional]

We will disclose our voting activities to the public from 2017 onwards.

FI 01	Mandatory to Report, Voluntary to Disclose	Gateway	General
FI 01.1	Provide a breakdown of your internally managed fixed income securities by active and passive strategies		
<i>Private</i>			
FI 01.2	Additional information. [Optional]		
<i>Private</i>			
FI 03	Mandatory to Report, Voluntary to Disclose	Descriptive	General
FI 03.1	Indicate the approximate (+/- 5%) breakdown of your SSA investments, by developed markets and emerging markets.		
<i>Private</i>			
FI 03.2	Indicate the approximate (+/- 5%) breakdown of your corporate and securitised investments by investment grade or high-yield securities.		
<i>Private</i>			
FI 03.3	Additional information. [Optional]		
<i>Private</i>			
FI 04	Mandatory	Gateway	PRI 1
FI 04.1	Indicate 1) Which ESG incorporation strategy and/or combination of strategies you apply to your actively managed fixed income investments; and 2) The proportion (+/- 5%) of your total actively managed fixed income investments each strategy applies to.		
SSA	Screening alone	0	
	Thematic alone	0	
	Integration alone	0	
	Screening + integration strategies	100	
	Thematic + integration strategies	0	
	Screening + thematic strategies	0	
	All three strategies combined	0	
	No incorporation strategies applied	0	
	Corporate (financial)	Screening alone	0
Thematic alone		0	
Integration alone		0	
Screening + integration strategies		0	
Thematic + integration strategies		0	
Screening + thematic strategies		0	
All three strategies combined		100	
No incorporation strategies applied		0	

Corporate (non-financial)	0	Screening alone
	0	Thematic alone
	0	Integration alone
	0	Screening + integration strategies
	0	Thematic + integration strategies
	0	Screening + thematic strategies
	100	All three strategies combined
	0	No incorporation strategies applied

**FI 04.2** Describe your reasons for choosing a particular ESG incorporation strategy and how combinations of strategies are used.

Within the corporate investments ESG issues are integrated into the investment process on a portfolio manager level within the overall company analysis. We also use external screening services. Screening strategy is done to understand the risks in the specific investment and on a portfolio level. We screen for certain elements like CO2 emissions, controversial weapons, global compact and positive impact. The thematic approach involves for e.g CO2 intensity and positive impact within the credit portfolio.

**FI 05** Mandatory to Report, Voluntary to Disclose Core Assessed PRI 1

**FI 05.1** Indicate which ESG factors you systematically research as part of your analysis on issuers.

Private

**FI 05.2** Indicate what format your ESG information comes in and where you typically source it

Private

**FI 05.3** Provide a brief description of the ESG information used, highlighting any differences in sources of information across your ESG incorporation strategies.

Private

**FI 05.4** Additional information. [Optional]

Private

**FI 06** Mandatory Additional Assessed PRI 1

**FI 06.1** Indicate how you ensure that your ESG research process is robust:

- Issuers are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- Issuer information and/or ESG ratings are updated regularly to ensure ESG research is accurate
- Internal audits of ESG research are undertaken in a systematic way
- ESG analysis is benchmarked for quality against other providers
- Other, specify
- None of the above

**FI 06.2** Describe how your ESG information or analysis is shared among your investment team.

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

**FI 07** Mandatory Gateway PRI 1

**FI 07.1** Indicate the type of screening you conduct.

	SSA	Corporate (financial)	Corporate (non-financial)
Negative/exclusionary screening	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Positive/best-in-class screening	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Norms-based screening	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
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**FI 07.2** Describe your approach to screening for internally managed active fixed income

Investable SSA universe is divided into four buckets based on Corruption Index score (CPI). Best score category is favoured and issuers in the worst quartile are usually avoided or scrutinized thoroughly.

In corporates we use the MSCI data for screening the portfolio and markets in general. Screening is done to understand the risks in the specific investment and on a portfolio level. We screen for certain elements like CO2 emissions, controversial weapons, global compact and positive impact. The thematic approach involves for e.g CO2 intensity and positive impact within the credit portfolio.

**FI 08** Mandatory Descriptive PRI 1

**FI 08.1** Indicate why you conduct negative screening.

**SSA**

- For legal reasons
- For non-legal reasons

**Corporate (fin)**

- For legal reasons
- For non-legal reasons

**Corporate (non-fin)**

- For legal reasons
- For non-legal reasons

**FI 08.2** Describe your approach to ESG-based negative screening of issuers from your investable universe.

Negative screening for issuers with worst score based on Corruption Perception Index.

Screening is done to understand the risks in the specific investment and on a portfolio level. We do negative screening for certain elements like CO2 emissions, controversial weapons, global compact. We do this to understand the risks and improve our portfolio risk/return profile.

**FI 09** Voluntary Additional Assessed PRI 1

**FI 09.1** Provide examples of how ESG factors are included in your screening criteria.

Private

**FI 09.2** Additional information.

Private

**FI 10** Mandatory Core Assessed PRI 1

**FI 10.1** Indicate which systems your organisation has to ensure that fund screening criteria are not breached in fixed income investments.

Type of screening	Checks
<b>Negative/exclusionary screening?</b>	<input checked="" type="checkbox"/> Checks are performed to ensure that issuers meet screening criteria <input checked="" type="checkbox"/> Data used for the screening criteria is updated at least every 2 years <input type="checkbox"/> Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria <input type="checkbox"/> Audits of fund holdings are undertaken regularly by internal audit or compliance functions <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above
<b>Positive/best-in-class screening</b>	<input checked="" type="checkbox"/> Checks are performed to ensure that issuers meet screening criteria <input checked="" type="checkbox"/> Data used for the screening criteria is updated at least every 2 years <input type="checkbox"/> Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria <input type="checkbox"/> Audits of fund holdings are undertaken regularly by internal audit or compliance functions <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above
<b>Norms-based screening</b>	<input checked="" type="checkbox"/> Checks are performed to ensure that issuers meet screening criteria <input checked="" type="checkbox"/> Data used for the screening criteria is updated at least every 2 years <input type="checkbox"/> Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria <input type="checkbox"/> Audits of fund holdings are undertaken regularly by internal audit or compliance functions <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above

FI 11	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1	
FI 11.1	Indicate the type of sustainability thematic funds or mandates that your organisation manages.			
Private				
FI 11.5	Additional information [OPTIONAL]			
Private				
FI 12	Mandatory	Core Assessed	PRI 1	
FI 12.1	Indicate whether you encourage transparency and disclosure relating to the issuance of themed bonds as per the Green Bonds Principles:			
<input checked="" type="checkbox"/> We require that themed bond proceeds are only allocated to environmentally or socially beneficial projects <input checked="" type="checkbox"/> We require the issuer (or 3rd party assurer) to demonstrate a process which determines the eligibility of projects to which themed bond proceeds are allocated <input checked="" type="checkbox"/> We require issuers to demonstrate a systematic and transparent process of disbursing themed bond proceeds to eligible projects until all funds are allocated <input checked="" type="checkbox"/> We require issuers to report at least once per year on the projects to which proceeds have been allocated including a description of those projects <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above				
FI 12.2	Describe the actions you take when issuers do not disburse bond proceeds as described in the offering documents.			
We would request further information why this has happened and if not satisfied we would sell the bonds. This would not only be due to uneligibility by definition but also a question of trust and governance.				
FI 13	Mandatory	Additional Assessed	PRI 1	
FI 13.1	Indicate how you assess the environmental or social impact of your thematic investments			
<input checked="" type="checkbox"/> We require issuers to report at least once per year on specific environmental or social impacts resulting from our themed investments <input type="checkbox"/> We ensure independent audits are conducted on the environmental or social impact of our investments <input type="checkbox"/> We have a proprietary system to measure environmental and social impact <input checked="" type="checkbox"/> We measure the impact of our themed bond investments on specific ESG factors such as carbon emissions or human rights <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above				
FI 14	Mandatory	Descriptive	PRI 1	
FI 14.1	Describe your approach to integrating ESG into traditional financial analysis.			
Within the credit investments ESG issues are integrated into the investment process on a portfolio manager level. In addition we also use external screening services. An ongoing dialogue and meetings with companies' management teams and in-depth knowledge of the investment targets all reduce the chance of negative surprises and provide an understanding of the kinds of factors that make a good, responsibly operating company, and thus a good investment. Our approach is a mix of quantitative and qualitative. A good scoring improves the overall investment score and a weak ESG rating reduces the attractiveness on the investment.				
FI 14.2	Describe how your ESG integration approach is adapted to each of the different types of fixed income you invest in.			
	SSA			
Corruption Perception Index by Transparency International used for ranking investable universe.				
	Corporate (financial)			
ESG issues are integrated into the investment process on a portfolio manager level. In addition we also use external screening services. An ongoing dialogue and meetings with companies' management teams and in-depth knowledge of the investment targets all reduce the chance of negative surprises and provide an understanding of the kinds of factors that make a good, responsibly operating company, and thus a good investment. Our approach is a mix of quantitative and qualitative. A good scoring improves the overall investment score and a weak ESG rating reduces the attractiveness on the investment. The process is the same for financials and non-financials but governance issues are more in focus.				
	Corporate (non-financial)			
ESG issues are integrated into the investment process on a portfolio manager level. In addition we also use external screening services. An ongoing dialogue and meetings with companies' management teams and in-depth knowledge of the investment targets all reduce the chance of negative surprises and provide an understanding of the kinds of factors that make a good, responsibly operating company, and thus a good investment. Our approach is a mix of quantitative and qualitative. A good scoring improves the overall investment score and a weak ESG rating reduces the attractiveness on the investment.				
FI 15	Mandatory	Core Assessed	PRI 1	
FI 15.1	Indicate how ESG information is typically used as part of your investment process.			
		SSA	Corporate (financial)	Corporate (non-financial)
ESG analysis is integrated into fundamental analysis		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
ESG analysis is integrated into security weighting decisions		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

ESG analysis is integrated into portfolio construction decisions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
ESG analysis is a standard part of internal credit ratings or assessment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
ESG analysis for issuers is a standard agenda item at investment committee meetings	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
ESG analysis is regularly featured in internal research notes or similar	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
ESG analysis is a standard feature of ongoing portfolio monitoring	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
ESG analysis features in all internal issuer summaries or similar documents	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other, specify	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

FI 16	Mandatory	Additional Assessed	PRI 1
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**FI 16.1** Indicate the extent to which ESG issues are reviewed in your integration process.

	Environment	Social	Governance
SSA	<input type="radio"/> Systematically <input checked="" type="radio"/> Occasionally <input type="radio"/> Not at all	<input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all	<input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all
Corporate (financial)	<input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all	<input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all	<input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all
Corporate (non-financial)	<input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all	<input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all	<input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all

**FI 16.2** Please provide more detail on how you review E, S and G factors in your integration process.

SSA	Environmental issues are currently under development in SSA investments. Social and Governance issues fully integrated into SSA investment process.
Corporate (financial)	Within financials it is similar to the description on corporates below but there is more focus put on the governance issues.
Corporate (non-financial)	A starting point is whether there are or has there been serious controversies. If yes we raise the question whether they have been resolved. The ESG factors can vary between sectors. Typical elements within environment would be toxic emissions and waste, water stress, carbon emissions, product carbon footprint and opportunities in clean tech. Social aspect includes labour management, health and safety or product safety. Within Governance the general corporate governance, anti competitive practices and Business ethics & fraud. The focus on these issues varies between sectors.

FI 18	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 2
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**FI 18.1** Indicate if you engage on your fixed income assets. Please exclude any engagements carried out solely in your capacity as a shareholder.

Private

**FI 18.3** Additional information.[OPTIONAL]

Private

FI 19	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1,2
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**FI 19.1** Indicate how you typically engage with issuers as a fixed income investor, or as both a fixed income and listed equity investor. (Please do not include engagements where you are both a bondholder and shareholder but engage as a listed equity investor only.)

Private

**FI 19.2** Indicate how your organisation prioritises engagements with issuers

Private

If 'other' has been selected, please give a description

Private

**FI 19.3** Indicate when your organisation conducts engagements with issuers.

Private

	If 'other' has been selected, please give a description		
Private			
FI 19.4	Indicate how your organisation conducts engagements with issuers.		
Private			
	If 'other' has been selected, please give a description		
Private			
FI 19.5	Indicate what your organisation conducts engagements with issuers on.		
Private			
	If 'other' has been selected, please give a description		
Private			
FI 19.6	Indicate how your organisation shares the outcomes of the engagements internally.		
Private			
	If 'other' has been selected, please give a description		
Private			
FI 19.7	Additional information.[OPTIONAL]		
Private			
FI 20	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1,2
FI 20.1	Indicate if your publicly available policy documents explicitly refer to fixed income engagement separately from engagements in relation to other asset classes.		
Private			
FI 20.3	Additional information [OPTIONAL]		
Private			
FI 21	Mandatory to Report, Voluntary to Disclose	Additional Assessed	General
FI 21.1	Indicate whether your organisation measures how your incorporation of ESG analysis in fixed income has affected investment outcomes and/or ESG performance.		
Private			
FI 21.2	Describe how your organisation measures how your incorporation of ESG analysis in fixed income has affected investment outcomes and/or ESG performance. [OPTIONAL]		
Private			
FI 21.3	Additional information.[OPTIONAL]		
Private			
FI 22	Voluntary	Descriptive	PRI 1,2
FI 22.1	Provide examples of how your incorporation of ESG analysis and/or your engagement of issuers has affected your fixed income investment outcomes during the reporting year.		
Private			
FI 22.2	Additional information.		
Private			
FI 23	Mandatory	Core Assessed	PRI 2,6
FI 23.1	Indicate if your organisation proactively discloses information on your approach to RI across all of your fixed income investments.		
	<input checked="" type="checkbox"/> We disclose it publicly <a href="http://www.elo.fi/tietoa-elosta/sijoitukset/elon-vastuullisuus-sijoitustoiminnassa">http://www.elo.fi/tietoa-elosta/sijoitukset/elon-vastuullisuus-sijoitustoiminnassa</a>		
FI 23.2	Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.		
	<input checked="" type="checkbox"/> Yes		
FI 23.3	Indicate the information your organisation proactively discloses to the public regarding your approach to RI incorporation.		
	<input checked="" type="checkbox"/> Broad approach to RI incorporation <input type="checkbox"/> Detailed explanation of RI incorporation strategy used		
FI 23.4	Indicate how frequently you typically report this information.		
	<input type="checkbox"/> Quarterly or more frequently <input type="checkbox"/> Biannually <input checked="" type="checkbox"/> Annually <input type="checkbox"/> Less frequently than annually		

- Ad-hoc/when requested
- No
- We do not proactively disclose it to the public and/or clients/beneficiaries

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

Private

PR 01.2 Provide a breakdown of your organisations allocation to Real Estate Investment Trusts (REITs) or similar

Private

PR 01.3 Additional information. [Optional]

Private

PR 02	Mandatory to Report, Voluntary to Disclose	Gateway	General
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PR 02.1 Provide a breakdown of your organisation's property assets based on who manages the assets.

Property assets managed by	Breakdown of your property assets (by number)
Managed directly by your organisation	<input type="radio"/> >50% <input type="radio"/> 10-50% <input checked="" type="radio"/> <10% <input type="radio"/> 0%
Managed via third-party property managers appointed by you	<input checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%
Managed by other investors or their property managers	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%
Managed by tenant(s) with operational control	<input type="radio"/> > 50% <input type="radio"/> 10-50% <input checked="" type="radio"/> < 10% <input type="radio"/> 0%
<b>Total</b>	<b>100%</b>

PR 02.2 Additional information. [Optional]

Decision-making related to property investments, leasing and new construction etc. is entirely made by Elo. We have several managers and cooperation partners conducting operational property management and leasing activities in compliance with guidelines set by Elo.

PR 03	Voluntary	Descriptive	General
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PR 03.1 Indicate up to three of your largest property types by AUM.

Private

PR 03.2 Additional information.

Private

PR 04	Mandatory	Core Assessed	PRI 1-6
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PR 04.1 Indicate if your organisation has a Responsible Property Investment (RPI) policy.

Yes

PR 04.2 Provide a URL or attach the document

URL

[http://www.elo.fi/~ /media/files/yhtioasiat/\\_\\_\\_elo\\_vastuullinen\\_sijoittaminen\\_060317.ashx](http://www.elo.fi/~ /media/files/yhtioasiat/___elo_vastuullinen_sijoittaminen_060317.ashx)

Attach Document

No

PR 04.3 Provide a brief overview of your organisation's approach to responsible investment in property, and how you link responsible investment in property to your business strategy.

In direct property, responsible investment is considered in both new investments and in the management of existing portfolio. All new investments go through a due diligence process, which includes not only investment figures analysis but ESG issues are considered as well. Every new investment has to meet the requirements set to sustainable land use, planning, design, construction and energy efficiency. We appreciate excellent public transport connections (especially train or metro) due to environmental issues and increasing tenant demand for such locations. In addition, all our partners in new construction projects and their processes have to meet our responsibility requirements.

For the existing portfolio there are several operations in order to continuously monitor and improve the responsibility of our direct property investments. For

example, we monitor buildings' energy, electricity and water consumption, amounts of waste generated as well as set targets in order to improve environmental efficiency in terms of these categories. We have several environmental certified buildings and consider these issues also when making new investments. In addition, we provide consumption figures to our tenants and partners.

We comply with regulation and standards in all portfolio management activities such as construction, property valuation etc. We prevent grey economy by carefully selecting our partners and assuring that they operate in compliance with regulation. We measure tenant satisfaction regularly.

PR 07	Mandatory	Gateway/Core Assessed	PRI 1
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**PR 07.1** Indicate if your organisation typically incorporates ESG issues when selecting property investments.

Yes

**PR 07.2** Provide a description of your organisation's approach to incorporating ESG issues in property investment selection.

In the pre-selection phase of a new property investment all aspects of ESG are covered. In new investments' due diligence process requirements set to, for example, sustainable land use, planning, design, construction, public transport connections and energy efficiency must be met. In addition, all our partners and contractors in construction projects and their processes have to meet our responsibility requirements. We use check lists in order to analyze ESG issues in property investment selection.

Our ESG process covers also viewpoints such as tenant reliability and credit risk, technical condition of the building, indoor air quality, environmental risks and juridical issues such as real estate company information and tax compliance as well as zoning regulation. Weaknesses regarding ESG issues usually lead to rejection of a potential investment. We may use environmental certificates such as LEED or BREEAM for new and existing buildings when we consider it feasible. External experts and advisors may be used when analyzing environmental, technical and juridical issues. The process is the same regardless of property type or location.

No

**PR 07.3** Indicate which E, S and/or G issues are typically considered by your organisation in the property investment selection process, and list up to three examples per issue.

- Environmental
  - Energy efficiency
  - Waste management
  - Indoor environmental quality
- Social
  - Accessibility
  - Health, Safety and wellbeing
  - Occupier Satisfaction
- Governance
  - Supply chain governance
  - Regulatory

PR 08	Voluntary	Additional Assessed	PRI 1,3
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**PR 08.1** Indicate what type of ESG information your organisation typically considers during your property investment selection process.

Private

**PR 08.2** Provide a brief description of how this ESG information was incorporated into your investment selection process.

Private

PR 09	Mandatory	Core Assessed	PRI 1
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**PR 09.1** Indicate if ESG issues impacted your property investment selection process during the reporting year.

- ESG issues helped identify risks and/or opportunities for value creation
- ESG issues led to the abandonment of potential investments
- ESG issues impacted the investment in terms of price offered and/or paid
- ESG issues impacted the terms in the shareholder/purchase agreements and/or lending covenants
- ESG issues were considered but did not have an impact on the investment selection process
- Other, specify
- Not applicable, our organisation did not select any investments in the reporting year
- We do not track this potential impact

**PR 09.2** Indicate how ESG issues impacted your property investment deal structuring processes during the reporting year.

- ESG issues impacted the investment in terms of price offered and/or paid
- ESG issues impacted the terms in the shareholder/purchase agreements and/or lending covenants
- ESG issues were considered but did not have an impact on the deal structuring process
- Other, specify
- Not applicable, our organisation did not select any investments in the reporting year
- We do not track this potential impact

PR 10	Mandatory	Core Assessed	PRI 4
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**PR 10.1** Indicate if your organisation includes ESG issues in your selection, appointment and/or monitoring of third-party property managers.

✓ Yes

<b>PR 10.2</b>	<b>Indicate how your organisation includes ESG issues in your selection, appointment and/or monitoring of third party property managers.</b>
<input checked="" type="checkbox"/> Selection process of property managers incorporated ESG issues	
<b>Types of actions</b>	
<input checked="" type="checkbox"/> Request explanation of how ESG is effectively integrated, including inquiries about governance and processes	
<input type="checkbox"/> Request track records and examples of how the manager implements ESG in their asset and property management	
<input checked="" type="checkbox"/> Discuss property level out-performance opportunities through greater integration of ESG criteria	
<input type="checkbox"/> Request explanation of engaging stakeholders on ESG issues	
<input type="checkbox"/> Other, explain	
<b>Coverage</b>	
<input checked="" type="radio"/> 75-100%	
<input type="radio"/> 50-75%	
<input type="radio"/> 25 - 50%	
<input type="radio"/> 0 - 25%	
<input checked="" type="checkbox"/> Contractual requirements when appointing property managers includes ESG issues	
<b>Types of actions</b>	
<input checked="" type="checkbox"/> Include clear and detailed expectations for incorporating ESG	
<input type="checkbox"/> Require dedicated ESG procedures in all relevant asset and property management phases	
<input type="checkbox"/> Clear ESG reporting requirements	
<input type="checkbox"/> Clear ESG performance targets	
<input type="checkbox"/> Other, explain	
<b>Coverage</b>	
<input type="radio"/> 75-100%	
<input checked="" type="radio"/> 50-75%	
<input type="radio"/> 25 - 50%	
<input type="radio"/> 0 - 25%	
<input checked="" type="checkbox"/> Monitoring of property managers covers ESG responsibilities and implementation	
<b>Types of actions</b>	
<input checked="" type="checkbox"/> Performance against quantitative and material environmental / resource targets over specified timeframe.	
<input checked="" type="checkbox"/> Performance against quantitative and material environmental / resource targets against relevant benchmarks	
<input type="checkbox"/> Performance against quantitative and qualitative targets to address social impacts of the portfolio/investment,	
<input type="checkbox"/> Other, explain	
<b>Coverage</b>	
<input type="radio"/> 75-100%	
<input checked="" type="radio"/> 50-75%	
<input type="radio"/> 25 - 50%	
<input type="radio"/> 0 - 25%	

No

<b>PR 10.3</b>	<b>Provide a brief description of your organisations selection, appointment and monitoring of third party property managers and how they contribute to the management of ESG issues for your property investments.</b>
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Third party manager selection is done through negotiations with potential partners based on our policies, requirements, objectives and legislation guiding our operations as a Finnish mutual pension insurance company.

Manager selection is done on the basis of e.g. manager's expertise in certain property class or market area, identifying environmentally friendly and cost-effective solutions in property maintenance and customer service capability.

In addition, we investigate manager's commitments to quality standards, other initiatives such as "green office", "best place to work" or other employee well-being measurement systems, references etc. and make sure that all manager's operations comply with legislation.

We monitor our third party managers by regular meetings and reporting in accordance with our operating protocols. Decisions and alignments are documented.

<b>PR 11</b>	<b>Mandatory</b>	<b>Gateway</b>	<b>PRI 2</b>
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<b>PR 11.1</b>	<b>Indicate if your organisation, and/or property managers, considers ESG issues in post-investment activities relating to your property assets.</b>
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✓ Yes

**PR 11.2** Indicate whether your organisation, and/or property managers, considers ESG issues in the following post-investment activities relating to your property assets.

- We consider ESG issues in property monitoring and management
- We consider ESG issues in property developments and major renovations.
- We consider ESG issues in property occupier engagements
- We consider ESG issues in community engagements related to our properties
- We consider ESG issues in other post-investment activities, specify

Communication with tenants and other partners e.g. by providing them property-specific ESG information

**PR 11.3** Describe how your organisation, and/or property managers, considers ESG issues in post-investment activities related to your property assets.

We monitor consumption figures on energy, electricity, water and waste and seek for opportunities to improve efficiency. This is mainly conducted by the managers, who monitor the figures their IT-systems and seek opportunities to reduce these impacts as well as provide information for us related to these issues. Specific projects aiming at reducing environmental impacts (e.g. environmental certificates, waste management, air ventilation units, lighting, building automation systems, window sealings etc.) are discussed in cooperation with managers.

We conduct tenant satisfaction surveys with our partners on yearly basis and go through the results as well as tenants' suggestions for improvements with property managers and decide on arrangements based on the results. We require careful selection of service providers on property maintenance and projects in order to assure that all regulations and legislation is met and sites are safe and environmental issues are covered.

No

**PR 12** **Mandatory** **Core Assessed** **PRI 2,3**

**PR 12.1** Indicate the proportion of property assets for which your organisation, and/or property managers, set and monitored ESG targets (KPIs or similar) during the reporting year.

- >90% of property assets
- 51-90% of property assets
- 10-50% of property assets
- <10% of property assets

**PR 12.2** Indicate which ESG targets your organisation and/or property managers typically set and monitor

Environmental

Target/KPI	Progress Achieved
Energy and electricity consumption	Extension of properties monitored, commitment to national energy efficiency agreement
Water consumption	Piloting new technology to decrease water consumption
Waste amounts and recycling	Property specific reviews and plans to improve waste amounts and recycling based by the reviews

Social

Target/KPI	Progress Achieved
Tenant satisfaction	Slightly increased tenant satisfaction after major management restructuring (mainly commercial and office properties)

Governance

Target/KPI	Progress Achieved
Potential deficiencies in grey economy prevention (partner selection, tax compliance etc.)	No major defects or risks identified

We do not set and/or monitor against targets

**PR 12.3** Additional information. [Optional]

During the reporting year, we conducted calculation of carbon dioxide emissions for the majority of our portfolio in property level.

We aim at systematic measurement of accidents and insurance claims in our properties in order to improve prevention of these incidents for taking place.

**PR 13** **Voluntary** **Descriptive** **PRI 2**

**PR 13.1** Indicate whether your property assets are assessed against certification schemes, ratings and/or benchmarks

Private

**PR 13.3** Additional information.

Private

**PR 14** **Mandatory** **Core Assessed** **PRI 2**

**PR 14.1** Indicate the proportion of active property developments and major renovations where ESG issues have been considered.

- >90% of active developments and major renovations
- 51-90% of active developments and major renovations
- 10-50% of active developments and major renovations
- <10% of active developments and major renovations
- N/A, no developments and major renovations of property assets are active

**PR 14.2** Indicate if the following ESG considerations are typically implemented and monitored in your property developments and major renovations.

- Environmental site selection requirements
- Environmental site development requirements
- Sustainable construction materials
- Water efficiency requirements
- Energy efficiency requirements
- Energy generation from on-site renewable sources
- Waste management plans at sites
- Health and safety management systems at sites
- Construction contractors comply with sustainability guidelines
- Resilient building design and orientation
- Other, specify

**PR 15** **Mandatory** **Core Assessed** **PRI 2**

**PR 15.1** Indicate the proportion of property occupiers your organisation, and/or your property managers, engaged with on ESG issues during the reporting year.

- >90% of occupiers
- 51-90% of occupiers
- 10-50% of occupiers
- <10% of occupiers

**PR 15.2** Indicate if the following practises and areas are typically part of your, and/or your property managers', occupier engagements.

- Distribute a sustainability guide to occupiers
- Organise occupier events focused on increasing sustainability awareness
- Deliver training on energy and water efficiency
- Deliver training on waste minimisation
- Provide feedback on energy and water consumption and/or waste generation
- Provide feedback on waste generation
- Carry out occupier satisfaction surveys
- Offer green leases
- Other, specify

**PR 15.3** Additional information. [Optional]

In some of our buildings, modern information screens in common areas provide real-time information on consumption figures (energy, water etc.) of the building as well as advice in order to reduce these environmental impacts.

For residential tenants, we have building specific websites, which offer information on energy efficiency, general instructions, contact information etc.

In our large shopping centers waste management is a significant issue. We aim at minimizing waste amounts and maximizing recycling by increasing awareness and offering practical guidance for improved waste management in cooperation with our tenants.

**PR 16** **Voluntary** **Additional Assessed** **PRI 2**

**PR 16.1** Indicate the proportion of all leases signed during the reporting year that used green leases or the proportion of Memoranda of Understandings (MoUs) with reference to ESG issues.

Private

**PR 16.2** Additional information.

Private

**PR 17** **Voluntary** **Additional Assessed** **PRI 2**

**PR 17.1** Indicate in respect of what proportion of property assets your organisation, and/or your property managers, engaged with the community on ESG issues during the reporting year.

Private

**PR 17.2** Indicate if the following areas and activities are typically part of your, and/or your property managers', community engagement.

Private

**PR 17.3** Additional information.

Private

PR 18	Voluntary	Additional Assessed	PRI 1,2
PR 18.1	Indicate whether your organisation measures how your approach to responsible investment in property investments has affected financial and/or ESG performance.		
Private			
PR 18.3	Describe how you are able to determine these outcomes.		
Private			
PR 19	Voluntary	Descriptive	PRI 1,3
PR 19.1	Provide examples of ESG issues that affected your property investments during the reporting year.		
Private			
PR 19.2	Additional information. [Optional]		
Private			
PR 20	Mandatory	Core Assessed	PRI 6
PR 20.1	Indicate if your organisation proactively discloses ESG information on your property investments.		
<input checked="" type="checkbox"/> Disclose publicly <a href="http://www.elo.fi/tietoa-elosta/uutiset/2017/elon-sijoitukset-parjasivat-hyvin-hillijalanjaljen-tarkastelussa-vuonna-2016">http://www.elo.fi/tietoa-elosta/uutiset/2017/elon-sijoitukset-parjasivat-hyvin-hillijalanjaljen-tarkastelussa-vuonna-2016</a> <a href="http://www.elo.fi/~media/files/yhtioasiat/___elo_vastuullinen_sijoittaminen_060317.ashx">http://www.elo.fi/~media/files/yhtioasiat/___elo_vastuullinen_sijoittaminen_060317.ashx</a>			
PR 20.2	Indicate if your organisation uses property specific reporting standards to disclose information related to your property investments' ESG performance.		
<input type="checkbox"/> Global Reporting Initiative (GRI) Construction & Real Estate Sector Supplement (CRESS) <input type="checkbox"/> Other property reporting standards, specify <input checked="" type="checkbox"/> No property specific reporting standards are used			
PR 20.3	Indicate if the level of ESG information you provide to the public is the same as the level you provide to your clients/beneficiaries.		
<input type="radio"/> Yes <input checked="" type="radio"/> No			
PR 20.4	Indicate the type of ESG information that your organisation proactively discloses to the public.		
<input checked="" type="checkbox"/> ESG information on how you select property investments <input checked="" type="checkbox"/> ESG information on how you monitor and manage property investments <input type="checkbox"/> Information on your property investments' ESG performance <input checked="" type="checkbox"/> Other, specify Carbon footprint of property investments			
PR 20.5	Indicate your organisation's typical frequency of disclosing ESG information to the public.		
<input type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input checked="" type="radio"/> Annually <input type="radio"/> Less frequently than annually <input type="radio"/> Ad-hoc/when requested, specify			
PR 20.6	Indicate the type of ESG information that your organisation proactively discloses to your clients/beneficiaries.		
<input type="checkbox"/> ESG information on how you select property investments <input type="checkbox"/> ESG information on how you monitor and manage property investments <input checked="" type="checkbox"/> Information on your property investments' ESG performance <input checked="" type="checkbox"/> Other, specify Client-specific consumption figures in several properties			
PR 20.7	Indicate your organisation's typical frequency of disclosing ESG information to your clients/beneficiaries.		
<input type="radio"/> Quarterly or more frequently <input type="radio"/> Semi annually <input checked="" type="radio"/> Annually <input type="radio"/> Every two years or less frequently <input type="radio"/> Ad-hoc/when requested, specify			
PR 20.8	Describe the ESG information and how your organisation proactively discloses it to the public and/or clients/beneficiaries. [Optional]		
We provide figures of Elo's investments' carbon footprint and information on how we choose and manage property investments at our websites.			



We use property-specific info screens in several properties that provide real-time consumption figures and guidance on how to improve ESG issues for our tenants.

- Disclose to clients/beneficiaries only
- No proactive disclosure to the public or to clients/beneficiaries

INF 01	Mandatory to Report, Voluntary to Disclose	Descriptive	General
INF 01.1	Indicate the level of ownership you typically hold in your infrastructure investments.		
	<i>Private</i>		
INF 01.2	Additional information. [Optional]		
	<i>Private</i>		
INF 02	Mandatory to Report, Voluntary to Disclose	Gateway/Peering	General
INF 02.1	Provide a breakdown of your organisation's infrastructure assets based on who manages the assets.		
	<i>Private</i>		
INF 02.2	Additional information. [Optional]		
	<i>Private</i>		
INF 03	Voluntary	Descriptive	General
INF 03.1	Indicate up to three of your largest infrastructure sectors by AUM.		
	<i>Private</i>		
INF 03.2	Additional information.		
	<i>Private</i>		
INF 04	Voluntary	Descriptive	PRI 1-6
INF 04.1	Provide a brief overview of your organisation's approach to responsible investment in infrastructure where you have equity stakes.		
	<i>Private</i>		
INF 05	Mandatory	Core Assessed	PRI 1-6
INF 05.1	Indicate if your organisation has a responsible investment policy for infrastructure.		
	<input checked="" type="checkbox"/> Yes		
INF 05.2	Provide a URL if your policy is publicly available.		
	<a href="https://www.unpri.org/organisation/elo-mutual-pension-insurance-company-142427">https://www.unpri.org/organisation/elo-mutual-pension-insurance-company-142427</a>		
	<input type="checkbox"/> No		
INF 08	Mandatory	Gateway	PRI 1
INF 08.1	Indicate if your organisation typically incorporates ESG issues when selecting infrastructure investments.		
	<input checked="" type="checkbox"/> Yes		
INF 08.2	Describe your organisation's approach to incorporating ESG issues in infrastructure investment selection.		
	ESG issues are incorporated in an early stage during the investment selection process.		
	<input type="checkbox"/> No		
INF 09	Voluntary	Descriptive	PRI 1,4
INF 09.1	Indicate whether your organisation typically uses ESG advice and research sourced internally and/or externally when incorporating ESG issues into the infrastructure investment selection process.		
	<i>Private</i>		
INF 09.2	Additional information.		
	<i>Private</i>		
INF 10	Mandatory	Core Assessed	PRI 1,3
INF 10.1	Indicate which E, S and/or G issues are typically considered by your organisation in the investment selection process and list up to three typical examples per issue.		
	<input checked="" type="checkbox"/> Environmental n/a		
	<input checked="" type="checkbox"/> Social n/a		
	<input checked="" type="checkbox"/> Governance n/a		
INF 10.2	Additional information. [Optional]		
	All three are important. Which one is the most important then varies depending on the asset in question.		
INF 11	Voluntary	Additional Assessed	PRI 1,3

INF 11.1	Indicate what type of ESG information your organisation typically considers during your infrastructure investment selection process.		
Private			
INF 11.2	Additional information.		
Private			
INF 12	Voluntary	Additional Assessed	PRI 1
INF 12.1	Indicate if ESG issues impacted your infrastructure investment selection processes during the reporting year.		
Private			
INF 12.2	Indicate how ESG issues impacted your infrastructure investment deal structuring processes during the reporting year.		
Private			
INF 12.3	Additional information.		
Private			
INF 13	Mandatory	Core Assessed	PRI 4
INF 13.1	Indicate if your organisation includes ESG issues in your selection, appointment and/or monitoring of third-party operators.		
<input checked="" type="radio"/> Yes			
INF 13.2	Indicate your organisation includes ESG issues in your selection, appointment and/or monitoring of third-party operators.		
<input checked="" type="checkbox"/> Selection process of third-party operators incorporates ESG issues			
<input checked="" type="radio"/> For all third-party operators <input type="radio"/> For a majority of third-party operators <input type="radio"/> For a minority of third-party operators			
<input type="checkbox"/> Contractual requirements when appointing third-party operators includes ESG issues			
<input checked="" type="checkbox"/> Monitoring of third-party operators covers ESG responsibilities and implementation			
<input checked="" type="radio"/> For all third-party operators <input type="radio"/> For a majority of third-party operators <input type="radio"/> For a minority of third-party operators			
<input type="radio"/> No			
INF 14	Mandatory	Gateway	PRI 2
INF 14.1	Indicate if your organisation, and/or operators, consider ESG issues in post-investment activities relating to your infrastructure assets.		
<input checked="" type="radio"/> Yes			
INF 14.2	Indicate how your organisation, and/or operators, considers ESG issues in the following post-investment activities relating to your infrastructure assets.		
<input checked="" type="checkbox"/> We consider ESG issues in the monitoring and operation of infrastructure			
<input checked="" type="checkbox"/> We consider ESG issues in infrastructure maintenance			
<input checked="" type="checkbox"/> We consider ESG issues in stakeholder engagements related to our infrastructure			
<input type="checkbox"/> We consider ESG issues in other post-investment activities, specify			
INF 14.3	Describe how your organisation, and/or operators, considers ESG issues in post-investment activities related to your infrastructure investments. [Optional]		
ESG issues are part of the decision making processes.			
<input type="radio"/> No			
INF 15	Mandatory	Core Assessed	PRI 2
INF 15.1	Indicate the proportion of infrastructure assets where your organisation, and/or operators, included ESG performance in investment monitoring during the reporting year.		
<input type="radio"/> >90% of infrastructure assets <input type="radio"/> 51-90% of infrastructure assets <input checked="" type="radio"/> 10-50% of infrastructure assets <input type="radio"/> <10% of infrastructure assets			
INF 15.2	Indicate ESG issues for which your organisation, and/or operators, typically sets and monitors targets (KPIs or similar) and provide examples per issue.		
<input checked="" type="checkbox"/> Environmental			
Collecting and proper recycling of hazardous waste.			
Monitoring and cleaning of oil spills.			
Energy savings.			

- Social
  - Health and safety reporting.
  - Follow up on employees well being.
- Governance
  - Monitoring of the management and reporting practices.
- We do not set and/or monitor against targets

INF 16	Mandatory	Additional Assessed	PRI 2
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INF 16.1	Indicate if you track the proportion of your infrastructure investees that have an ESG/sustainability-related policy (or similar guidelines).
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Yes

INF 16.2	Indicate the proportion of your infrastructure investees that have an ESG/sustainability-related policy (or similar guidelines).
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- >90% of infrastructure investees
  - 51-90% of infrastructure investees
  - 10-50% of infrastructure investees
  - <10% of infrastructure investees
  - 0% of infrastructure investees
- No

INF 17	Voluntary	Descriptive	PRI 2,3
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INF 17.1	Indicate the type and frequency of reports you request and/or receive from infrastructure investees covering ESG issues.
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*Private*

INF 17.2	Additional information.
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*Private*

INF 18	Mandatory	Core Assessed	PRI 2
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INF 18.1	Indicate the proportion of active infrastructure maintenance projects where ESG issues have been considered.
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- >90% of active maintenance projects
- 51-90% of active maintenance projects
- 10-50% of active maintenance projects
- <10% of active maintenance projects
- N/A, no maintenance projects of infrastructure assets are active

INF 19	Voluntary	Additional Assessed	PRI 2
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INF 19.1	Indicate which stakeholders your organisation, and/or operators, engaged with on ESG issues in relation to your infrastructure assets during the reporting year and what proportion of your investments they apply to.
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*Private*

INF 19.2	Describe your approach to stakeholder engagements in relation to your infrastructure assets.
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*Private*

INF 20	Voluntary	Additional Assessed	PRI 1,2
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INF 20.1	Indicate whether your organisation measures how your approach to responsible investment in Infrastructure investments has affected financial and/or ESG performance.
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*Private*

INF 20.2	Describe how you are able to determine these outcomes.
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*Private*

INF 21	Voluntary	Descriptive	PRI 1,3
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INF 21.1	Provide examples of ESG issues that affected your infrastructure investments during the reporting year.
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*Private*

INF 21.2	Additional information.
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*Private*

INF 22	Mandatory	Core Assessed	PRI 6
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INF 22.1	Indicate if your organisation proactively discloses ESG information on your infrastructure investments.
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- Disclose publicly
- Disclose to clients/beneficiaries only
- No proactive disclosure to the public or to clients/beneficiaries

IFD 01	Voluntary	Descriptive	PIIF General
IFD 01.1	Indicate if you have a distinct mission and investment objective for your investment in inclusive finance.		
Private			
IFD 01.3	Additional information.		
Private			
IFD 02	Voluntary	Descriptive	PIIF General
IFD 02.1	Provide a brief description of the governance and management structures and processes you have in place for your responsible investment activities and implementation of the PIIF.		
Private			
IFD 03	Voluntary	Descriptive	PIIF General
IFD 03.1	Indicate if you set social targets for your organisation, specific to inclusive finance.		
Private			
IFD 03.2	Additional information.		
Private			
IFD 04	Mandatory to Report, Voluntary to Disclose	Gateway	PIIF General
IFD 04.1	Of your total assets invested directly in inclusive finance, indicate what percentage is invested in the following:		
Private			
IFD 04.2	Additional information. [Optional]		
Private			
IFD 05	Mandatory to Report, Voluntary to Disclose	Gateway	PIIF General
IFD 05.1	Of your total assets invested directly in inclusive finance, indicate what percentage is invested in the following:		
Private			
IFD 05.2	Additional information. [Optional]		
Private			
IFD 09	Voluntary	Additional Assessed	PIIF 1
IFD 09.1	Indicate if you support the introduction of services tailored to the following client groups.		
Private			
IFD 09.2	Indicate if you collect data regarding the percentage or number of total active clients that are:		
Private			
IFD 09.3	Additional information.		
Private			
IFD 10	Voluntary	Descriptive	PIIF 1
IFD 10.1	Indicate if you provide technical assistance to your investees.		
Private			
IFD 10.2	Additional information.		
Private			
IFD 14	Mandatory	Core Assessed	PIIF 3
IFD 14.1	In relation to your direct portfolio in debt, indicate if you provide investment in local currency.		
<input checked="" type="checkbox"/> Yes			
IFD 14.2	Indicate what percentage of your direct portfolio in debt is invested in the investee's local currency.		
<input type="checkbox"/> No			
<input type="checkbox"/> >80%			
IFD 15	Mandatory	Descriptive	PIIF 3
IFD 15.1	In relation to your direct portfolio in debt, indicate what percentage have a maturity (from the point of investment) of the specified duration:		
<input checked="" type="checkbox"/> 12 months or fewer			

- <20
- 13 to 24 months
- 25 to 60 months
- Over 60 months

IFD 17

Mandatory

Core Assessed

PIIF 3

IFD 17.1

Indicate if you adopt the following practices:

For fixed income investments: Use the Lenders' Guidelines for Setting Covenants in Support of Responsible Microfinance as an example or reference document.

Ensure that the investee understands the terms, covenants and their implications prior to signing loan / shareholder documentation.

Describe your process.

Discussions with the investee prior signing

Indicate if these practices are formalised in written policies and procedures.

- Yes
- No

Foster trust and proactive dialogue with investees through straightforward discussions on issues such as a covenant breach.

Describe your process.

Regular discussions and follow-up of investees' financial performance

Indicate if these practices are formalised in written policies and procedures.

- Yes
- No

In the case of material covenant breach, create/participate in a voluntary workout group where applicable, with the goal to help the investee remain a going concern whenever possible.

Indicate if these practices are formalised in written policies and procedures.

- Yes
- No

For fixed income investments: Train your staff on effective monitoring and covenant waiver negotiations to manage deteriorating conditions, and transition a non-performing loan from loan origination staff to specialised workout staff.

Indicate if these practices are formalised in written policies and procedures.

- Yes
- No

Encourage investee skills-building on financial projections, scenario planning and stress-testing for management, and on financial expertise and governance for Directors.

Other (explain)

None of the above

IFD 18

Mandatory

Gateway

PIIF 4

During due diligence.

- Yes
- No
- We don't track social performance

For monitoring and reporting purposes.

- Yes
- No
- We don't track social performance

During due diligence.

- Yes
- No
- We don't track social performance

For monitoring and reporting purposes.

- Yes
- No

We don't track social performance

During due diligence.

- Yes
- No
- We don't track social performance

For monitoring and reporting purposes.

- Yes
- No
- We don't track social performance

IFD 19

Mandatory

Descriptive

PIIF 4

IFD 19.1 Indicate if you require the retail institutions in which you invest to have an independent financial rating.

- Always
- In a majority of cases
- In a minority of cases
- No

IFD 19.2 Indicate if you require the retail institutions in which you invest to have an independent social rating.

- Always
- In a majority of cases
- In a minority of cases
- No

IFD 19.3 Indicate if you require the retail institutions in which you invest to have an independent social audit.

- Yes
- No

IFD 20

Mandatory

Core Assessed

PIIF 4

Pre-investment

- Yes
- No
- Not for all of our investments in inclusive finance

Post-investment

- Yes
- No
- Not for all of our investments in inclusive finance

Pre-investment

- Yes
- No
- Not for all of our investments in inclusive finance

Post-investment

- Yes
- No
- Not for all of our investments in inclusive finance

Describe what you look at and, if post-investment, the frequency of assessment. [Optional]

Background check of the Board at the pre-investment stage

Pre-investment

- Yes
- No
- Not for all of our investments in inclusive finance

Post-investment

- Yes
- No

✓ Not for all of our investments in inclusive finance

IFD 21	Voluntary	Descriptive	PIIF 4
IFD 21.1	Indicate if you provide training or assistance for your investees on corporate governance.		
Private			
IFD 21.2	Additional information.		
Private			
IFD 23	Mandatory	Descriptive	PIIF 4
IFD 23.1	Indicate if you have a procedure to integrate the consideration of environmental issues in your investment decision processes.		
<input checked="" type="checkbox"/> Yes <ul style="list-style-type: none"> <li><input type="checkbox"/> For all inclusive finance investments</li> <li><input checked="" type="checkbox"/> For a majority of inclusive finance investments</li> <li><input type="checkbox"/> For a minority of inclusive finance investments</li> </ul>			
IFD 23.2	Describe how your procedure to integrate the consideration of environmental issues in your investment decisions processes affect decisions pre-investment. [Optional]		
Assessment of the environmental risk as a part of industry related and/or company specific risks on potentially higher risk cases			
<input type="checkbox"/> No			
IFD 23.4	Indicate if you request your investees to comply with an environmental exclusion list.		
<input type="checkbox"/> Yes, for all investees <input type="checkbox"/> Yes, for a majority of investees <input type="checkbox"/> Yes, for a minority of investees <input checked="" type="checkbox"/> No			
IFD 24	Voluntary	Additional Assessed	PIIF 4
IFD 24.1	Indicate if you have anti-corruption policies.		
Private			
IFD 24.2	Indicate if you have internal whistle-blowing policies.		
Private			
IFD 24.3	Indicate if you review whether your investees have anti-corruption policies as part of your due diligence process.		
Private			
IFD 24.4	Indicate if you review whether your investees have internal whistle-blowing policies as part of your due diligence process.		
Private			
IFD 24.5	Additional information.		
Private			
IFD 25	Voluntary	Additional Assessed	PIIF 5
IFD 25.1	Indicate how your mission and investment objectives communicated to stakeholders (e.g. investees, investors).		
Private			
IFD 25.2	Additional information.		
Private			
IFD 26	Mandatory	Core Assessed	PIIF 5
IFD 26.1	Other than the PRI/PIIF, indicate if you provide your investors and/or the public with information aligned with industry standards.		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
IFD 27	Mandatory	Core Assessed	PIIF 5
Pricing			
<input checked="" type="checkbox"/> Yes			
IFD 27.2	Indicate how you ensure this for pricing and provide examples.		
Pricing conditions are provided to customers before signing the contract.			
<input type="checkbox"/> No			
Other terms and conditions			
<input checked="" type="checkbox"/> Yes			

IFD 27.3	Indicate how you ensure this for other terms/conditions and provide examples.
Terms are provided to customers before signing the contract.	
<input type="radio"/> No	

IFD 32	Mandatory	Core Assessed	PIIF 7
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IFD 32.1	Select which of the following collaborative initiatives your organisation has supported or participated in, and the role you played.
	The Principles for Investors in Inclusive Finance
	<input type="radio"/> Yes <input checked="" type="radio"/> No
	The Smart Campaign
	<input type="radio"/> Yes <input checked="" type="radio"/> No
	Social Performance Task Force
	<input type="radio"/> Yes <input checked="" type="radio"/> No
	Financial Inclusion Equity Council (formerly CMEF)
	<input type="radio"/> Yes <input checked="" type="radio"/> No
	European Microfinance Platform (eMFP)
	<input type="radio"/> Yes <input checked="" type="radio"/> No
	Global Impact Investors Network (GIIN)
	<input type="radio"/> Yes <input checked="" type="radio"/> No

IFD 33	Voluntary	Additional Assessed	PIIF 7
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IFD 33.1	Indicate if you encourage your investees to be a member of/endorse the following:
<i>Private</i>	
IFD 33.2	Additional information.
<i>Private</i>	

IFD 34	Voluntary	Additional Assessed	PIIF 7
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IFD 34.1	Indicate if you encourage your investees to participate in initiatives which contribute to the development of industry benchmarks.
<i>Private</i>	
IFD 34.2	Additional information.
<i>Private</i>	