




Principle	Objective	Priority
LEA 02	Mandatory	High
Type of engagement		
Individual/ internal staff engagements	<ul style="list-style-type: none"> To support investment decision-making by company leaders To encourage improved ESG practices Other: specify 	
Collaborative engagements	<ul style="list-style-type: none"> To support investment decision-making by company leaders To encourage improved ESG practices Other: specify 	
Service provider engagements	<ul style="list-style-type: none"> To support investment decision-making by company leaders To encourage improved ESG practices Other: specify 	
Reason for interaction		
	<ul style="list-style-type: none"> To support investment decision-making by company leaders To encourage improved ESG practices Other: specify 	

RI TRANSPARENCY REPORT 2018

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.

31/12/2017

OO 04.2 Indicate your total AUM at the end of your reporting year, Exclude subsidiaries you have chosen not to report on and any advisory/execution only assets.

Total AUM
23,053,000,000 EUR
27,352,309,951 USD

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	0	<10%
Property	<10%	<10%
Infrastructure	<10%	<10%
Commodities	0	0
Hedge funds	0	<10%
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	Select how you would like to disclose your asset class mix.
<input type="radio"/> as percentage breakdown <input checked="" type="radio"/> 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.
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.
Private	
OO 08.2	Additional information. [Optional]
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.
Private	
OO 09.2	Additional information. [Optional]
Private	

OO 10	Mandatory	Gateway	General
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OO 10.1	Select the active ownership activities your organisation implemented in the reporting year.
Listed equity – engagement	
<input checked="" type="checkbox"/> We engage with companies on ESG factors via our staff, collaborations or service providers. <input type="checkbox"/> We require our external managers to engage with companies on ESG factors on our behalf. <input type="checkbox"/> We do not engage directly and do not require external managers to engage with companies on ESG factors.	
Listed equity – voting	
<input checked="" type="checkbox"/> We cast our (proxy) votes directly or via dedicated voting providers <input type="checkbox"/> We require our external managers to vote on our behalf. <input type="checkbox"/> We do not cast our (proxy) votes directly and do not require external managers to vote on our behalf	
Fixed income SSA – engagement	
<input checked="" type="checkbox"/> We engage with companies on ESG factors via our staff, collaborations or service providers. <input type="checkbox"/> We require our external managers to engage with companies on ESG factors on our behalf. <input type="checkbox"/> We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.	
Fixed income Corporate (financial) – engagement	
<input checked="" type="checkbox"/> We engage with companies on ESG factors via our staff, collaborations or service providers. <input type="checkbox"/> We require our external managers to engage with companies on ESG factors on our behalf. <input type="checkbox"/> We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.	
Fixed income Corporate (non-financial) – engagement	
<input checked="" type="checkbox"/> We engage with companies on ESG factors via our staff, collaborations or service providers. <input type="checkbox"/> We require our external managers to engage with companies on ESG factors on our behalf. <input type="checkbox"/> We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.	

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).
Listed equity	
<input checked="" type="checkbox"/> We address ESG incorporation.	

We do not do ESG incorporation.

Fixed income - SSA

We address ESG incorporation.

We do not do ESG incorporation.

Fixed income - corporate (financial)

We address ESG incorporation.

We do not do ESG incorporation.

Fixed income - corporate (non-financial)

We address ESG incorporation.

We do not do ESG incorporation.

Property

We address ESG incorporation.

We do not do ESG incorporation.

Infrastructure

We address ESG incorporation.

We do not do ESG incorporation.

Inclusive finance

We address ESG incorporation.

We do not do ESG incorporation.

Cash

We address ESG incorporation.

We do not do ESG incorporation.

00 11.2 Select the externally managed assets classes in which you and/or your investment consultants address ESG incorporation in your external manager selection, appointment and/or monitoring processes.

Asset class	ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes
Listed equity	<p>Listed equity - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p><input type="checkbox"/> We do not do ESG incorporation</p>
Fixed income - SSA	<p>Fixed income - SSA - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p><input type="checkbox"/> We do not do ESG incorporation</p>
Fixed income - corporate (financial)	<p>Fixed income - corporate (financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p><input type="checkbox"/> We do not do ESG incorporation</p>
Fixed income - corporate (non-financial)	<p>Fixed income - corporate (non-financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p><input type="checkbox"/> We do not do ESG incorporation</p>

Private equity	<input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation	Private equity - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes
Property	<input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation	Property - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes
Infrastructure	<input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation	Infrastructure - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes
Hedge funds	<input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation	Hedge funds - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes
Forestry	<input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation	Forestry - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes

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

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, do they have a published climate strategy and so on.

We monitor broadly managers' practices regarding ESG. We analyze underlying holdings of each fund, and if we find controversies related to specific companies, we will discuss them with the manager. When possible we monitor also portfolios underlying holdings. Also, we interview fund managers on ESG-practices and integration.

OO 12 **Mandatory** **Gateway** **General**

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

Core modules	<input checked="" type="checkbox"/> Organisational Overview <input checked="" type="checkbox"/> Strategy and Governance
RI implementation directly or via service providers	<input type="checkbox"/>

	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"/>	Property
<input checked="" type="checkbox"/>	Infrastructure
<input checked="" type="checkbox"/>	Inclusive Finance
	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"/>	Private Equity
<input checked="" type="checkbox"/>	Property
<input checked="" type="checkbox"/>	Infrastructure
	Closing module
<input checked="" type="checkbox"/>	Closing module

OO LE 01	Mandatory to Report, Voluntary to Disclose	Gateway	General
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OO LE 01.1	Provide a breakdown of your internally managed listed equities by passive, active - quantitative (quant), active - fundamental and active - other strategies.
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Private

OO LE 01.2	Additional information. [Optional]
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Private

OO FI 01	Mandatory to Report, Voluntary to Disclose	Gateway	General
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OO FI 01.1	Provide a breakdown of your internally managed fixed income securities by active and passive strategies
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Private

OO FI 01.2	Additional information. [Optional]
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Private

OO FI 03	Mandatory to Report, Voluntary to Disclose	Descriptive	General
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OO FI 03.1	Indicate the approximate (+/- 5%) breakdown of your SSA investments, by developed markets and emerging markets.
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Private

OO FI 03.3	Additional information. [Optional]
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Private

OO SAM 01	Mandatory to Report, Voluntary to Disclose	Gateway	General
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OO SAM 01.1	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

OO SAM 01.2	Additional information [Optional].
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Private

OO PR 01	Mandatory to Report, Voluntary to Disclose	Descriptive	General
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Private

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

OO PR 01.3 Additional information. [Optional]

Private

OO PR 02 Mandatory to Report, Voluntary to Disclose Gateway General

OO 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%
Total	100%

OO 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.

OO PR 03 Voluntary Descriptive General

OO PR 03.1 Indicate up to three of your largest property types by AUM.

Private

OO PR 03.2 Additional information.

Private

OO INF 01 Mandatory to Report, Voluntary to Disclose Descriptive General

OO INF 01.1 Indicate the level of ownership you typically hold in your infrastructure investments.

Private

OO INF 01.2 Additional information. [Optional]

Private

OO INF 02 Mandatory to Report, Voluntary to Disclose Gateway/Peering General

OO INF 02.1 Provide a breakdown of your organisation's infrastructure assets based on who manages the assets.

Private

OO INF 02.2 Additional information. [Optional]

Private

OO INF 03 Mandatory to Report, Voluntary to Disclose Descriptive General

OO INF 03.1 Indicate up to three of your largest infrastructure sectors by AUM.

Private

OO INF 03.2 Additional information.

Private

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 type="radio"/> Applicable policies cover all AUM <input checked="" 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 type="checkbox"/> Asset class-specific RI guidelines	
<input type="checkbox"/> Sector specific RI guidelines	
<input checked="" type="checkbox"/> Screening / exclusions policy	
<input type="checkbox"/> Engagement policy	
<input 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
- Time horizon of your investment
- Governance structure of organisational ESG responsibilities
- ESG incorporation approaches
- Active ownership approaches
- Reporting
- Climate change and related issues

SG 01.3a CC Describe how your products or investment strategy might be affected by the transition to a lower-carbon economy.

Private

SG 01.3b CC Describe how climate-related risks and opportunities are factored into your investment strategies or products.

Private

- Other RI considerations, specify (1)
- Other RI considerations, specify (2)

SG 01.4 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.

SG 01.5 Provide a brief description of the key elements, any variations or exceptions to your investment policy that covers your responsible investment approach. [Optional]

Responsibility is an integral part of Elo's investment operations. The objective of Elo's investment operations is to ensure the profitable and secure investment of employment pension assets. Elo's principles for responsible investing are based on corporate social responsibility: our accountability to policyholders and the insured. Responsibility is manifest in the selection and monitoring of investments, and it is also subject to constant development. The ESG aspects – environmental responsibility, social responsibility and corporate governance – are incorporated in all our investment operations.

Elo's principles of responsible investing and responsibility with regard to investment operations consist of the following areas:

- Responsible operating methods;
- Compliance with international norms;
- The assessment of responsibility as part of the analysis, decision-making and monitoring related to investments;
- Ownership steering and other means of influence.

No

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

Formalised guidelines on environmental factors

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

Screening / exclusions policy

URL/Attachment
<input checked="" type="checkbox"/> URL https://www.elo.fi/about-elo/investments/responsibility-in-elos-investment-operations?sc_lang=en
<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 https://www.elo.fi/about-elo/investments/responsibility-in-elos-investment-operations?sc_lang=en
<input type="checkbox"/> Attachment

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

URL/Attachment
<input checked="" type="checkbox"/> URL https://www.elo.fi/about-elo/investments/responsibility-in-elos-investment-operations?sc_lang=en
<input type="checkbox"/> Attachment

Governance structure of organisational ESG responsibilities

URL/Attachment
<input checked="" type="checkbox"/> URL https://www.elo.fi/about-elo/investments/responsibility-in-elos-investment-operations?sc_lang=en
<input type="checkbox"/> Attachment

ESG incorporation approaches

URL/Attachment
<input checked="" type="checkbox"/> URL https://www.elo.fi/about-elo/investments/responsibility-in-elos-investment-operations?sc_lang=en
<input type="checkbox"/> Attachment

Active ownership approaches

URL/Attachment
<input checked="" type="checkbox"/> URL https://www.elo.fi/about-elo/investments/responsibility-in-elos-investment-operations?sc_lang=en
<input type="checkbox"/> Attachment

Reporting

URL/Attachment
<input checked="" type="checkbox"/> URL https://www.elo.fi/about-elo/investments/responsibility-in-elos-investment-operations?sc_lang=en
<input type="checkbox"/> Attachment

Climate-related issues

URL/Attachment	
<input checked="" type="checkbox"/> URL	https://www.elo.fi/about-elo/investments/responsibility-in-elos-investment-operations?sc_lang=en
<input type="checkbox"/> Attachment	

Climate change and related issues

Private
 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
<https://www.elo.fi/about-elo/investments>
 No

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 and Bribery and Corruption.

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 set/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

- Board members or trustees
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Chief Executive Officer (CEO), Chief Investment Officer (CIO), Investment Committee
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment

- Other Chief-level staff or head of department, specify
 - Head of each asset class
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Portfolio managers
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- ESG portfolio manager
- Investment analysts
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Dedicated responsible investment staff
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- External managers or service providers
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Investor relations
- Other role, specify (1)
- Other role, specify (2)

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

Elo's Board of Directors approves the company's principles of responsible investing and the related document. The Executive Group of Investments is responsible for drafting and updating the principles. The Executive Group is supported in this task by a responsible investment steering group comprised of a diverse team of investment professionals. Head of Responsible Investment is responsible for developing and coordinating ESG-practices at Elo.

All portfolio managers are responsible for taking ESG- issues into account when making investment decisions. 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]

Head of Responsible Investment

SG 07 CC	Voluntary	Descriptive	General
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Private

SG 07.1 CC Indicate the roles in your organisation, and indicate for each whether they have oversight and/or implementation responsibilities for climate-related issues.

Private

SG 07.1a CC For the board level roles or for which you have climate-related issues oversight/accountability or implementation responsibilities, indicate how you execute these responsibilities.

Private

SG 07.1b CC For the management-level roles which assess and manage climate-related issues, provide further information on the structure and process involved.

Private

SG 08	Voluntary	Additional Assessed	General
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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 09.1

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

Principles for Responsible Investment

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

Moderate

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

Member of PRI's Private Equity working group

Asian Corporate Governance Association

Australian Council of Superannuation Investors

AFIC – La Commission ESG

BVCA – Responsible Investment Advisory Board

CDP Climate Change

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

Moderate

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

Contributed to the organisation or content of events organised by the initiative: Elo attended as a speaker at CDP's seminar in Finland.

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)

Eumedion

Extractive Industries Transparency Initiative (EITI)

ESG Research Australia

EVCA – Responsible Investment Roundtable

Global Investors Governance Network (GIGN)

Global Impact Investing Network (GIIN)

Global Real Estate Sustainability Benchmark (GRESB)

Green Bond Principles

Institutional Investors Group on Climate Change (IIGCC)

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

Basic

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 FFI Climate reporting working group

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

Finance Finland (FFI) represents banks, insurers, employee pension companies, finance houses, fund management companies and securities dealers. FFI Board made a policy decision stating that the financial sector supports the internationally agreed target of limiting global warming below 2 °C. To follow up this decision, FFI prepares indicators for its member companies that they can use to illustrate the practices they have in place to mitigate climate change. Companies choose independently how they apply these indicators. Elo has been active member of this working group.

- 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).

- 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

SBai (Standards Board for Alternative Investments)

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

SG 09.2	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1
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Indicate approximately what percentage (+/- 5%) of your externally managed assets are managed by PRI signatories.
Private

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 the actions your organisation has taken to promote responsible investment independently of collaborative initiatives. Provide a description of your role in contributing to the objectives of the selected action and the typical frequency of your participation/contribution.
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- Provided or supported education or training programmes (this includes peer to peer RI support) Your education or training may be for clients, investment managers, actuaries, broker/dealers, investment consultants, legal advisers etc.)

Description
Peer to peer discussions

Frequency of contribution
<input checked="" type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input type="radio"/> Ad hoc <input type="radio"/> Other

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

Description
Took part in master thesis' interviews regarding RI.
Frequency of contribution
<input checked="" type="checkbox"/> Quarterly or more frequently <input type="checkbox"/> Biannually <input type="checkbox"/> Annually <input type="checkbox"/> Less frequently than annually <input type="checkbox"/> Ad hoc <input type="checkbox"/> Other
<input checked="" type="checkbox"/> Encouraged better transparency and disclosure of responsible investment practices across the investment industry
Description
DD-questionnaire for asset managers
Frequency of contribution
<input type="checkbox"/> Quarterly or more frequently <input type="checkbox"/> Biannually <input checked="" type="checkbox"/> Annually <input type="checkbox"/> Less frequently than annually <input type="checkbox"/> Ad hoc <input type="checkbox"/> Other
<input checked="" type="checkbox"/> Spoke publicly at events and conferences to promote responsible investment
Description
Spoke at different events and seminars about responsible investment and Elo's approach.
Frequency of contribution
<input checked="" type="checkbox"/> Quarterly or more frequently <input type="checkbox"/> Biannually <input type="checkbox"/> Annually <input type="checkbox"/> Less frequently than annually <input type="checkbox"/> Ad hoc <input type="checkbox"/> Other
<input type="checkbox"/> Wrote and published in-house research papers on responsible investment
<input checked="" type="checkbox"/> Encouraged the adoption of the PRI
Description
DD-questionnaire for asset managers
Frequency of contribution
<input type="checkbox"/> Quarterly or more frequently <input type="checkbox"/> Biannually <input checked="" type="checkbox"/> Annually <input type="checkbox"/> Less frequently than annually <input type="checkbox"/> Ad hoc <input type="checkbox"/> Other
<input checked="" type="checkbox"/> Responded to RI related consultations by non-governmental organisations (OECD, FSB etc.)
Description
Contributed to EU's High Level Expert Groups' consultation regarding sustainable finance
Frequency of contribution
<input type="checkbox"/> Quarterly or more frequently <input type="checkbox"/> Biannually <input type="checkbox"/> Annually <input type="checkbox"/> Less frequently than annually <input checked="" type="checkbox"/> Ad hoc <input type="checkbox"/> Other
<input checked="" type="checkbox"/> Wrote and published articles on responsible investment in the media
Description
Contributed to articles regarding RI and Elo's RI-approach in national and international media. Published blog-writings etc.

Frequency of contribution	
<input type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input checked="" type="radio"/> Ad hoc <input type="radio"/> Other	
<input checked="" type="checkbox"/> A member of PRI advisory committees/ working groups, specify	
Description	
Member of PE-working group	
Frequency of contribution	
<input checked="" type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input type="radio"/> Ad hoc <input type="radio"/> Other	
<input checked="" type="checkbox"/> On the Board of, or officially advising, other RI organisations (e.g. local SIFs)	
Description	
Board member of Finsif	
Frequency of contribution	
<input checked="" type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input type="radio"/> Ad hoc <input type="radio"/> Other	
<input type="checkbox"/> Other, specify	
<input type="radio"/> 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.

Private

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

Private

SG 12	Mandatory	Core Assessed	PRI 4
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SG 12.1 Indicate whether your organisation uses investment consultants.

- Yes, we use investment consultants
- No, we do not use investment consultants.

SG 13	Mandatory	Descriptive	PRI 1
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SG 13.1 Indicate if your organisation executes scenario analysis and/or modelling in which the risk profile of future ESG trends at portfolio level is calculated.

- 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 consider scenario analysis that includes factors representing the investment impacts of future climate-related risks and opportunities

Is this scenario analysis based on a 2°C or lower scenario?

- Yes
- No

- We execute other scenario analysis, specify
- We do not execute such scenario analysis and/or modelling

SG SG 13.1a CC	Pleased describe the resilience of your organisation's strategy, considering different future climate scenarios.
Private	
SG 13.2	Indicate if your organisation considers ESG issues in strategic asset allocation and/or allocation of assets between sectors or geographic markets.
	We do the following
	<input type="checkbox"/> Allocation between asset classes <input checked="" type="checkbox"/> Determining fixed income duration <input checked="" type="checkbox"/> Allocation of assets between geographic markets <input checked="" type="checkbox"/> Sector weightings <input type="checkbox"/> Other, specify <input type="checkbox"/> We do not consider ESG issues in strategic asset allocation

SG 14	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1
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SG 14.1	Describe the process used to identify short, medium and long-term risks and opportunities that could have a material impact on your organisation and its activities.
Private	
SG 14.1 CC	Describe the processes used to determine which climate-related short, medium and long-term risks and opportunities could have a material impact on your organisation and its activities.
Private	
SG 14.2	Some investment risks and opportunities arise as a result of long term trends. Indicate which of the following you act on.
Private	
SG 14.4a CC	Please provide further details on these key metric(s) used to assess climate related risks and opportunities.
Private	
SG 14.4b CC	Please describe in further detail your key targets.
Private	
SG 14.5	If you selected disclosure on emissions risks, list any specific climate related disclosure tools or frameworks that you used.
Private	
SG 14.6	Additional information [Optional]
Private	
SG 14.7 CC	Describe your risk management processes for identifying, assessing, and managing climate-related risks.
Private	
SG 14.8 CC	Describe your processes for prioritising climate-related risks.
Private	
SG 14.9 CC	Do you conduct engagement activity with investee companies to encourage better disclosure and practices around climate-related risks?
Private	
SG 14.10 CC	Describe how you use data from climate-related disclosures.
Private	

SG 15	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1
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SG 15.1	Indicate if your organisation allocates assets to, or manages, funds based on specific environmental and social themed areas.
Private	

SG 16	Mandatory	Descriptive	General
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SG 16.1	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.
Asset Class	Describe what processes are in place and the outputs or outcomes achieved
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 17	Mandatory	Descriptive	General
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SG 17.1	Describe how you address ESG issues for externally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.
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Asset Class	Describe what processes are in place and the outputs or outcomes achieved	
Hedge funds - DDQ	Select whether you use the PRI Hedge Fund DDQ <input type="radio"/> Yes <input checked="" type="radio"/> No	
Hedge funds	<p>Elo Pension has internal principles for responsible investment. Pursuant to these internal principles, environmental, social and governance ("ESG") issues are integrated into investment process (incl. analysis, decision-making and risk management) alongside with traditional economic considerations.</p> <p>Elo's own proprietary Hedge Fund Manager DDQ addresses among others the following points:</p> <p>Please advise does the Fund (or the Sub-Fund) or the Manager thereof have a documented policy outlining its approach to responsible investment / ESG issues, or another formalised and consistent approach for integrating ESG factors into the Fund's investment research and analysis, decision-making and risk management? If yes, what it entails and what is the status of its implementation? Also, please send us a copy of such policy or other document.</p> <p>Please describe your engagement policy? Please send us a copy of such policy or other document. Do you disclose engagement activities publicly in your web-site or directly to your investors? If not, why?</p> <p>Are you reporting on ESG-related risks / opportunities to investors in the Fund? If not, why?</p> <p>Is the manager / investment manager signatory of the UN PRI or have you adopted other ESG-related standards or codes? If not, why?</p> <p>Policies regarding Climate change, controversial weapons and Global Compact-violations.</p>	
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 18	Voluntary	Descriptive	General
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SG 18.1	Indicate whether any specific features of your approach to responsible investment are particularly innovative.
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Private

SG 18.3	Additional information.
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Private

SG 19	Mandatory	Core Assessed	PRI 6
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SG 19.1	Indicate whether your organisation proactively discloses asset class specific information. Select the frequency of the disclosure to clients/beneficiaries and the public, and provide a URL to the public information.
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Fixed income

Do you disclose?

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

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

- Yes
- No

Disclosure to public and URL

Disclosure to public and URL

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

Annually

https://www.elo.fi/about-elo/investments/responsibility-in-elos-investment-operations?sc_lang=en

Infrastructure

Do you disclose?

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

The information disclosed to clients/beneficiaries is the same
<input checked="" type="radio"/> Yes <input type="radio"/> No

Disclosure to public and URL	
Disclosure to public and URL	<input checked="" type="checkbox"/> ESG information on how you select infrastructure investments <input type="checkbox"/> ESG information on how you monitor and manage infrastructure investments <input checked="" type="checkbox"/> Information on your infrastructure investments' ESG performance
Annually	
https://www.elo.fi/about-elo/investments/responsibility-in-elos-investment-operations?sc_lang=en	

Listed equity - Engagement

Do you disclose?
<input type="radio"/> We do not disclose to either clients/beneficiaries or the public. <input type="radio"/> We disclose to clients/beneficiaries only. <input checked="" type="radio"/> We disclose to the public
The information disclosed to clients/beneficiaries is the same
<input checked="" type="radio"/> Yes <input type="radio"/> No

Disclosure to public and URL	
Disclosure to public and URL	<input checked="" type="checkbox"/> Details on the overall engagement strategy <input checked="" type="checkbox"/> Details on the selection of engagement cases and definition of objectives of the selections, priorities and specific goals <input type="checkbox"/> Number of engagements undertaken <input type="checkbox"/> Breakdown of engagements by type/topic <input type="checkbox"/> Breakdown of engagements by region <input type="checkbox"/> An assessment of the current status of the progress achieved and outcomes against defined objectives <input checked="" type="checkbox"/> Examples of engagement cases <input type="checkbox"/> Details on eventual escalation strategy taken after the initial dialogue has been unsuccessful (i.e. filing resolutions, issuing a statement, voting against management, divestment etc.) <input type="checkbox"/> Details on whether the provided information has been externally assured <input type="checkbox"/> Outcomes that have been achieved from the engagement <input checked="" type="checkbox"/> Other information
Disclosure of collaborative engagements, membership in investor coalitions like IIGCC, public support of HLEG recommendations etc.	
Annually	
https://www.elo.fi/about-elo/news/2017/elo-to-engage-with-the-worlds-largest-emitters https://www.elo.fi/about-elo/news/2017/elo-mutual-pension-insurance-company-becomes-the-first-finnish-member-of-the-institutional-investors-group-on-climate-change-europes-pre-eminent-investor-voice-on-climate-action	

Listed equity – (Proxy) Voting

Do you disclose?
<input type="radio"/> We do not disclose to either clients/beneficiaries or the public. <input type="radio"/> We disclose to clients/beneficiaries only. <input checked="" type="radio"/> We disclose to the public
The information disclosed to clients/beneficiaries is the same
<input checked="" type="radio"/> Yes <input type="radio"/> No

Disclosure to public and URL

Disclosure to public and URL	
<input checked="" type="checkbox"/> Explain all voting decisions <input type="checkbox"/> Explain some voting decisions <input type="checkbox"/> Only explain abstentions and votes against management <input type="checkbox"/> No explanations provided	
Annually	
https://www.elo.fi/about-elo/investments/elos-ownership-policy	

Listed equity - Incorporation

Do you disclose?	
<input type="checkbox"/> We do not proactively disclose it to the public and/or clients/beneficiaries <input type="checkbox"/> We disclose to clients/beneficiaries only. <input checked="" type="checkbox"/> We disclose it publicly	
The information disclosed to clients/beneficiaries is the same	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Disclosure to public and URL	
Disclosure to public and URL	
<input type="checkbox"/> Broad approach to ESG incorporation <input checked="" type="checkbox"/> Detailed explanation of ESG incorporation strategy used	
Annually	
https://www.elo.fi/about-elo/investments/responsibility-in-elos-investment-operations?sc_lang=en	

Property

Do you disclose?	
<input type="checkbox"/> We do not disclose to either clients/beneficiaries or the public. <input type="checkbox"/> We disclose to clients/beneficiaries only. <input checked="" type="checkbox"/> We disclose to the public	
The information disclosed to clients/beneficiaries is the same	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Disclosure to public and URL		Disclosure to clients/beneficiaries			
Disclosure to public and URL		Disclosure to clients/beneficiaries			
<input 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 checked="" type="checkbox"/> Information on your property investments' ESG performance <input type="checkbox"/> Other		<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			
Annually		Annually			
https://www.elo.fi/about-elo/investments/responsibility-in-elos-investment-operations?sc_lang=en		<table border="1"> <tr> <td>Specify</td> </tr> <tr> <td>Client-specific consumption figures</td> </tr> </table>		Specify	Client-specific consumption figures
Specify					
Client-specific consumption figures					

Selection, Appointment and Monitoring

Do you disclose?	
<input type="checkbox"/> We do not disclose to either clients/beneficiaries or the public. <input type="checkbox"/> We disclose to clients/beneficiaries only.	

✓ We disclose to the public

	The information disclosed to clients/beneficiaries is the same
<input checked="" type="checkbox"/>	Yes
<input type="checkbox"/>	No

Disclosure to public and URL	
	Disclosure to public and URL
<input checked="" type="checkbox"/>	How responsible investment considerations are included in manager selection, appointment and monitoring processes
<input checked="" type="checkbox"/>	Details of the responsible investment activities carried out by managers on your behalf
<input checked="" type="checkbox"/>	E, S and/or G impacts and outcomes that have resulted from your managers' investments and/or active ownership
<input type="checkbox"/>	Other
Annually	
https://www.elo.fi/about-elo/investments/responsibility-in-elos-investment-operations?sc_lang=en	

SG 19.2	Additional information [Optional]
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Further information can be found on Elo's website: https://www.elo.fi/about-elo/investments/responsibility-in-elos-investment-operations?sc_lang=en and documents Elo's Principles of Responsible Investing and Elo's Climate Strategy for Investments.
Voting activity: <https://www.elo.fi/about-elo/investments/elos-ownership-policy> and Elo's annual report 2017.

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

Active investment strategies				
Active investment strategies	Listed Equity	FI - SSA	FI - Corporate (financial)	FI - Corporate (non-financial)
Screening	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Thematic	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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	
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 01.2 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 02.1 Indicate what RI-related information your organisation typically covers in the majority of selection documentation for your external managers

	LE	FI - SSA	FI - Corporate (financial)	FI - Corporate (non-financial)	Private equity	Property	Infrastructure
Investment strategy and how ESG objectives relate to it	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
ESG incorporation requirements	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ESG reporting requirements	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
No RI information covered in the RFPs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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

ESG people/oversight

	LE	FI - SSA	FI - Corporate (financial)?	FI - Corporate (non-financial)?	Private equity	Property	Infrastructure
Assess ESG expertise of investment teams	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Review the oversight and responsibilities of ESG implementation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Review how is ESG implementation enforced /ensured	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Review the manager's RI-promotion efforts and engagement with the industry	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Process/portfolio construction/investment valuation

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

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

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

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

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

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

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

integrated ESG strategy.

Real world economy targets means manager's approach to climate change issues. We encourage managers to develop and communicate a climate strategy.

Property: As a minimum level, the property portfolio has to have above medium GRESB score against its peer group.

SAM 04	Mandatory	Core Assessed	PRI 1
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SAM 04.1 Indicate if in the majority of cases and where the structure of the product allows, your organisation does any of the following as part of the manager appointment and/or commitment process

- Sets standard benchmarks or ESG benchmarks
- Defines ESG objectives
- Sets incentives and controls linked to the ESG objectives
- Requires reporting on ESG objectives
- Requires the investment manager to adhere to ESG guidelines, regulations, principles or standards
- None of the above
- None of the above, we invest only in pooled funds and have a thorough selection process

SAM 04.3 If none of the above, describe any other mechanisms in place to set expectations as part of the appointment or commitment process.

Regarding Private Equity managers we express our desire to see regular reporting on achievements.

Regarding credit funds we invest only in pooled vehicles and therefore can't set specific benchmarks etc but we have thorough selection process which includes also ESG topics we want to cover in RFP's/DD's when selecting funds. The same applies for SSA fund investments.

SAM 04.4 Indicate which of these actions your organisation might take if any of the requirements are not met

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

SAM 05	Mandatory	Core Assessed	PRI 1
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SAM 05.1 When monitoring managers, indicate which of the following types of responsible investment information your organisation typically reviews and evaluates

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

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

Property: Case studies provided by the manager

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

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

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

LE and FI: We monitor broadly managers' practices regarding ESG. When possible we monitor also portfolios underlying holdings

Private equity: depending on team size we urge small managers to define an own ESG guideline, to show an commitment to the issue while lacking the resource to do it more broadly.

Property: The GRESB score

SAM 05.3 Provide additional information relevant to your organisation's monitoring processes of external managers. [OPTIONAL]

Real world economy targets means climate change issues. We encourage managers to develop and communicate a climate strategy.

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

SAM 08.1 Describe how you ensure that best RI practice is applied to managing your assets

Private

SAM 08.2 Additional information. [Optional]

Private

SAM 09 Mandatory Additional Assessed PRI 1,6

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

Add Example 1

Topic or issue	Climate strategy
Conducted by	Internal staff
Asset class	Fixed income – corporate (financial)
Scope and process	We enquired current asset managers whether they have a climate strategy and encouraged them to implement this in their investment strategy in the future.
Outcomes	The enquiry did not yet affect our investment decisions.

Add Example 2

Add Example 3

Add Example 4

Add Example 5

We are not able to provide examples

LEI 01	Mandatory	Core Assessed	PRI 1						
LEI 01.1	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 <div style="border: 1px solid black; display: inline-block; padding: 2px;">Percentage of active listed equity to which the strategy is applied</div> <div style="border: 1px solid black; display: inline-block; padding: 2px;">100%</div> <input type="checkbox"/> We do not apply incorporation strategies								
LEI 01.2	Describe your organisation's approach to incorporation and the reasons for choosing the particular ESG incorporation strategy/strategies.								
	By combining these different types of ESG- incorporation strategies we want to make sure we capture a holistic view of companies' ESG- risks and opportunities.								
LEI 01.3	If assets are managed using a combination of ESG incorporation strategies, briefly describe how these combinations are used. [Optional]								
	<p>Integration: The ESG rating and classification are an integral aspect of the investment assessment. We pursue to identify the material ESG factors for each company and to assess the company's ability to manage those factors.</p> <p>Screening: We apply exclusion on controversial weapons and tobacco companies. We also apply norms based screening and different kind of positive and negative screening based on various ESG- criteria.</p> <p>Our goal is for more than half of our direct equity investments to have a measurable positive impact on the environment or society by 2025. This goal will be reached by investing in companies whose products or services contribute to finding solutions to sustainable development challenges.</p>								
LEI 02	Voluntary	Additional Assessed	PRI 1						
LEI 02.1	Indicate what ESG information you use in your ESG incorporation strategies and who provides this information.								
	<i>Private</i>								
LEI 02.2	Provide a brief description of the ESG information used, highlighting any different sources of information across your ESG incorporation strategies.								
	<i>Private</i>								
LEI 02.3	Indicate if you incentivise brokers to provide ESG research.								
	<i>Private</i>								
LEI 02.5	Additional information. [Optional]								
	<i>Private</i>								
LEI 03	Voluntary	Additional Assessed	PRI 1						
LEI 03.1	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.								
	<i>Private</i>								
LEI 03.2	Additional information. [Optional]								
	<i>Private</i>								
LEI 04	Mandatory	Descriptive	PRI 1						
LEI 04.1	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"> <input checked="" type="checkbox"/> Product <input type="checkbox"/> Activity <input type="checkbox"/> Sector <input type="checkbox"/> Country/geographic region <input checked="" type="checkbox"/> Environmental and social practices and performance <input checked="" type="checkbox"/> Corporate governance <div style="border: 1px solid black; margin-top: 5px;"> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 80%;"></th> <th style="width: 20%;">Description</th> </tr> </thead> <tbody> <tr> <td>Exclusions:</td> <td>Controversial weapons and tobacco</td> </tr> <tr> <td>Other screening:</td> <td>E,S and G-performance, Climate change related e.g. CO2- emissions</td> </tr> </tbody> </table> </div> <input checked="" type="checkbox"/> Positive/best-in-class screening				Description	Exclusions:	Controversial weapons and tobacco	Other screening:	E,S and G-performance, Climate change related e.g. CO2- emissions
	Description								
Exclusions:	Controversial weapons and tobacco								
Other screening:	E,S and G-performance, Climate change related e.g. CO2- emissions								

- 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 04.2	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 Elo's Principles of Responsible Investment- document.

LEI 05	Mandatory	Core Assessed	PRI 1
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LEI 05.1	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
- Third-party ESG 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
- Review and evaluation of external research providers
- Other, specify
- None of the above

LEI 05.2	Indicate the proportion of your actively managed listed equity portfolio that is subject to comprehensive ESG research as part your ESG screening strategy.
----------	---

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

LEI 05.3	Indicate how frequently third party ESG ratings are updated for screening purposes.
----------	---

- Quarterly or more frequently
- Bi-annually
- Annually
- Less frequently than annually

LEI 05.4	Indicate how frequently you review internal research that builds your ESG screens.
----------	--

- Quarterly or more frequently
- Bi-annually
- Annually
- Less frequently than annually

LEI 06	Voluntary	Additional Assessed	PRI 1
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LEI 06.1	Indicate which processes your organisation uses to ensure fund criteria are not breached
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Private

LEI 06.2	If breaches of fund screening criteria are identified - describe the process followed to correct those breaches.
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Private

LEI 06.3	Additional information.[Optional]																																									
Private																																										
LEI 07	Mandatory	Descriptive	PRI 1																																							
LEI 07.1	Indicate the type of sustainability thematic funds or mandates your organisation manages.																																									
<input type="checkbox"/> Environmentally themed funds <input type="checkbox"/> Socially themed funds <input checked="" type="checkbox"/> Combination of themes																																										
LEI 07.2	Describe your organisation's processes relating to sustainability themed funds. [Optional]																																									
We don't have a specific fund for the sustainable theme. Instead we have a broader sustainability theme for our investments. Our objective is that by 2025, more than half of our investments (direct equity and credit investments and all infrastructure and real asset investments) will have a measurable positive impact on the environment or society.																																										
LEI 08	Mandatory	Core Assessed	PRI 1																																							
LEI 08.1	Indicate which ESG factors you systematically research as part of your investment analysis and the proportion of actively managed listed equity portfolios that is impacted by this analysis.																																									
<table border="1"> <thead> <tr> <th>ESG issues</th> <th colspan="2">Proportion impacted by analysis</th> </tr> </thead> <tbody> <tr> <td rowspan="4">Environmental</td> <td colspan="2">Environmental</td> </tr> <tr> <td><input type="radio"/></td> <td><10%</td> </tr> <tr> <td><input type="radio"/></td> <td>10-50%</td> </tr> <tr> <td><input type="radio"/></td> <td>51-90%</td> </tr> <tr> <td></td> <td><input checked="" type="radio"/></td> <td>>90%</td> </tr> <tr> <td rowspan="4">Social</td> <td colspan="2">Social</td> </tr> <tr> <td><input type="radio"/></td> <td><10%</td> </tr> <tr> <td><input type="radio"/></td> <td>10-50%</td> </tr> <tr> <td><input type="radio"/></td> <td>51-90%</td> </tr> <tr> <td></td> <td><input checked="" type="radio"/></td> <td>>90%</td> </tr> <tr> <td rowspan="4">Corporate Governance</td> <td colspan="2">Corporate Governance</td> </tr> <tr> <td><input type="radio"/></td> <td><10%</td> </tr> <tr> <td><input type="radio"/></td> <td>10-50%</td> </tr> <tr> <td><input type="radio"/></td> <td>51-90%</td> </tr> <tr> <td></td> <td><input checked="" type="radio"/></td> <td>>90%</td> </tr> </tbody> </table>				ESG issues	Proportion impacted by analysis		Environmental	Environmental		<input type="radio"/>	<10%	<input type="radio"/>	10-50%	<input type="radio"/>	51-90%		<input checked="" type="radio"/>	>90%	Social	Social		<input type="radio"/>	<10%	<input type="radio"/>	10-50%	<input type="radio"/>	51-90%		<input checked="" type="radio"/>	>90%	Corporate Governance	Corporate Governance		<input type="radio"/>	<10%	<input type="radio"/>	10-50%	<input type="radio"/>	51-90%		<input checked="" type="radio"/>	>90%
ESG issues	Proportion impacted by analysis																																									
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LEI 08.2	Additional information. [Optional]																																									
ESG- issues are taken into a account in every investment decision and analysis.																																										
LEI 09	Voluntary	Additional Assessed	PRI 1																																							
LEI 09.1	Indicate which processes your organisation uses to ensure ESG integration is based on a robust analysis.																																									
Private																																										
LEI 09.5	Describe how ESG information is held and used by your portfolio managers.																																									
Private																																										
LEI 09.6	Additional information.[Optional]																																									
Private																																										
LEI 10	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 1																																							
LEI 10.1	Indicate which aspects of investment analysis you integrate material ESG information into.																																									
Private																																										
LEI 10.5	Additional information.																																									
Private																																										
LEI 11	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1																																							
LEI 11.1	Indicate if you manage passive listed equity funds that incorporate ESG issues in the index construction methodology.																																									
Private																																										
LEI 12	Voluntary	Descriptive	PRI 1																																							
LEI 12.1	Indicate how your ESG incorporation strategies have influenced the composition of your portfolio(s) or investment universe.																																									

Private

LEI 12.2 Additional information.[Optional]

Private

LEI 13	Voluntary	Additional Assessed	PRI 1
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LEI 13.1 Indicate whether your organisation measures how your approach to responsible investment in Listed Equity has affected your portfolio's financial and/or ESG performance.

Private

LEI 13.2 Describe how you are able to determine these outcomes.

Private

LEI 14	Voluntary	Descriptive	PRI 1
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LEI 14.1 Provide examples of ESG issues that affected your investment view and/or performance during the reporting year.

Private

LEI 14.2 Additional information.[Optional]

Private

LEA 01	Mandatory	Core Assessed	PRI 2
LEA 01.1	Indicate whether your organisation has a formal engagement policy.		
<input checked="" type="checkbox"/> Yes			
LEA 01.2	Attach or provide a URL to your engagement policy.		
<input type="checkbox"/> Attachment provided: <input checked="" type="checkbox"/> URL provided: https://www.elo.fi/about-elo/investments/elos-ownership-policy			
LEA 01.3	Indicate what your engagement policy covers:		
<input checked="" type="checkbox"/> Conflicts of interest <input checked="" type="checkbox"/> Insider information <input checked="" type="checkbox"/> Alignment with national stewardship code requirements <input checked="" type="checkbox"/> Due diligence and monitoring process <input type="checkbox"/> Prioritisation of engagements <input type="checkbox"/> Transparency of engagement activities <input checked="" type="checkbox"/> Environmental factors <input checked="" type="checkbox"/> Social factors <input checked="" type="checkbox"/> Governance factors <input type="checkbox"/> Other, describe <input type="checkbox"/> None of the above			
LEA 01.4	Provide a brief overview of your organization's approach to engagement		
<p>Elo mainly pursues to influence its investments through three channels: by participating in annual general meetings (equity investments) and initiating dialogue with the company management (equity and corporate bond investments) and by participating in the nomination boards of the companies.</p> <p>If the activities of the investment do not meet Elo's requirements for responsibility, Elo may initiate or contribute to the engagement process to change the investment's activities, if it is reasonable to do so with regard to the actual opportunities for influence. In terms of indirect investments, engagement generally concerns a service provider (e.g., fund manager). Influence through engagement can be carried out by Elo alone or together with other investors and/ or external co-operative partners.</p>			
<input type="checkbox"/> No			
LEA 01.6	Additional information [optional]		
Elo's engagement policy is described in Elo's ownership policy and Elo's Principles of Responsible Investing.			

LEA 02	Mandatory	Gateway	PRI 1,2,3
LEA 02.1	Indicate the method of engagement, giving reasons for the interaction.		
	Type of engagement	Reason for interaction	
	Individual/Internal staff engagements	<input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence) 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 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 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	
		<div style="border: 1px solid black; padding: 5px;"> <p>Please specify why your organisation does not engage via service providers.</p> <p>We are able to conduct engagements without service providers via our own and collaborative engagements. Our own responsibility and fiduciary duty includes also taking good care of our expenses. Service providers would increase our expenses quite a lot.</p> </div>	

LEA 03	Mandatory	Core Assessed	PRI 2
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LEA 03.1	Indicate whether your organisation has a formal process for identifying and prioritising engagement activities carried out by internal staff.
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Yes

LEA 03.2	Describe the criteria used to identify and prioritise engagement activities carried out by internal staff.
----------	--

- Geography / market of the companies
- Materiality of ESG factors
- Systemic risks to global portfolios
- Exposure (holdings)
- In response to ESG impacts that have already occurred.
- As a response to divestment pressure
- Consultation with clients/beneficiaries
- Consultation with other stakeholders (i.e. NGOs, trade unions etc.)
- As a follow-up from a voting decision
- Client request
- Other, describe

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.
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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 during and following your engagements activities carried out by internal staff.
----------	---

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 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 your objectives
- Tracking and/or monitoring progress against defined objectives
- Tracking and or monitoring progress of actions taken when original objectives are not met
- Revisit and, if necessary, revise objectives on continuous basis
- Other, please specify
- We do not monitor and evaluate progress of engagement activities carried out by internal staff

LEA 04.4	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 05	Mandatory	Core Assessed	PRI 2
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LEA 05.1	Indicate whether your organisation has a formal process for identifying and prioritising collaborative engagements
----------	--

Yes

LEA 05.2	Describe the criteria used to identify and prioritise collaborative engagements.
----------	--

- Potential to learn from other investors
- Ability to add value to the collaboration
- Geography / market of the companies targeted by the collaboration
- Materiality of ESG factors addressed by the collaboration
- Systemic risks to global portfolios addressed by the collaboration
- Exposure (holdings) to companies targeted by the collaboration
- In reaction to ESG impacts addressed by the collaboration that have already occurred.
- As a response to divestment pressure
- As a follow-up from a voting decision

- Consultation with clients/beneficiaries
 - Consultation with other stakeholders (i.e. NGOs, trade unions etc.)
 - Other, describe
- No

LEA 06	Mandatory	Core Assessed	PRI 2
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LEA 06.1	Indicate if you define specific objectives for your engagement activities carried out collaboratively.
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- 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 collaboratively.

LEA 06.2	Indicate if you monitor the actions companies take during and following your collaborative engagements.
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- 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 collaboratively

LEA 06.3	Indicate if you do any of the following to monitor and evaluate the progress of your collaborative engagement activities.
----------	---

- Define timelines for your objectives
- Tracking and/or monitoring progress against defined objectives
- Tracking and or monitoring progress of actions taken when original objectives are not met
- Revisit and, if necessary, revise objectives on continuous basis
- Other, please specify
- We do not monitor and evaluate progress of engagement activities carried out by internal staff

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.
----------	--

Type of engagement	Insights shared
Individual/Internal staff engagements	<input checked="" type="checkbox"/> Yes, systematically <input type="checkbox"/> Yes, occasionally <input type="checkbox"/> No
Collaborative engagements	<input checked="" type="checkbox"/> Yes, systematically <input type="checkbox"/> Yes, occasionally <input type="checkbox"/> No

LEA 09.2	Additional information. [Optional]
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Internal staff engagements: Portfolio managers are always informed of any engagements and usually they are conducting the engagements by themselves or together with other staff at Elo.

LEA 10	Mandatory	Gateway	PRI 2
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LEA 10.1	Indicate if you track the number of your engagement activities.
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Type of engagement	Tracking engagements
Individual / Internal staff engagements	<input checked="" type="checkbox"/> Yes, we track the number of our engagements in full <input type="checkbox"/> Yes, we partially track the number of our engagements <input type="checkbox"/> We do not track
Collaborative engagements	<input checked="" type="checkbox"/> Yes, we track the number of our engagements in full <input type="checkbox"/> Yes, we partially track the number of our engagements <input type="checkbox"/> We do not track and cannot estimate our engagements

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.
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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 11.3	Indicate the percentage of your collaborative engagements for which you were a leading organisation during the reporting year.
----------	--

Private

LEA 11.5	Additional information. [Optional]
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Private

LEA 12	Voluntary	Additional Assessed	PRI 2
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LEA 12.1	Indicate which of the following your engagement involved.
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Private

LEA 12.2	Additional information. [Optional]
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Private

LEA 13	Voluntary	Descriptive	PRI 2
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LEA 13.1	Indicate whether you track the number of cases during the reporting year in which 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.
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Private

LEA 13.3	Additional information [Optional].
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Private

LEA 14	Voluntary	Additional Assessed	PRI 2
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LEA 14.1	Provide examples of the engagements that your organisation or your service provider carried out during the reporting year.
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Private

LEA 14.2	Additional information. [Optional]
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Private

LEA 15	Mandatory	Core Assessed	PRI 1,2,3
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LEA 15.1	Indicate whether your organisation has a formal voting policy.
----------	--

Yes

LEA 15.2	Indicate what your voting policy covers:
----------	--

- Conflicts of interest
- Share blocking
- Securities lending process
- Prioritisation of voting activities
- Decision making processes
- Environmental factors
- Social factors
- Governance factors
- Filing/co-filing resolutions
- Extraordinary meetings
- Regional voting practices
- Transparency of proxy voting activities
- Company dialogue pre/post vote
- Other, describe
- None of the above

LEA 15.3	Attach or provide a URL to your voting policy. [Optional]
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<http://www.elo.fi/about-elo/investments/elos-ownership-policy>

LEA 15.4	Provide a brief overview of your organization's approach to (proxy) voting.
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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.

Outside of Finland, Elo participates in the annual general meetings of those companies in which Elo is a significant owner or for which participation is deemed appropriate for some other reason.

No

LEA 16	Mandatory	Descriptive	PRI 2
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LEA 16.1	Indicate how you typically make your (proxy) voting decisions.					
	<table border="1"> <tr> <td>Approach</td> </tr> <tr> <td> <input type="radio"/> We use our own research or voting team and make voting decisions without the use of service providers. <input checked="" type="radio"/> We hire service provider(s) that make voting recommendations or provide research that we use to inform our voting decisions. </td> </tr> <tr> <td>Based on</td> </tr> <tr> <td> <input type="radio"/> the service provider voting policy signed off by us <input checked="" type="radio"/> our own voting policy <input type="radio"/> our clients' requests or policy <input type="radio"/> other, explain </td> </tr> <tr> <td> <input type="radio"/> 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. <input type="radio"/> We hire service provider(s) that make voting decisions on our behalf. </td> </tr> </table>	Approach	<input type="radio"/> We use our own research or voting team and make voting decisions without the use of service providers. <input checked="" type="radio"/> We hire service provider(s) that make voting recommendations or provide research that we use to inform our voting decisions.	Based on	<input type="radio"/> the service provider voting policy signed off by us <input checked="" type="radio"/> our own voting policy <input type="radio"/> our clients' requests or policy <input type="radio"/> other, explain	<input type="radio"/> 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. <input type="radio"/> We hire service provider(s) that make voting decisions on our behalf.
Approach						
<input type="radio"/> We use our own research or voting team and make voting decisions without the use of service providers. <input checked="" type="radio"/> We hire service provider(s) that make voting recommendations or provide research that we use to inform our voting decisions.						
Based on						
<input type="radio"/> the service provider voting policy signed off by us <input checked="" type="radio"/> our own voting policy <input type="radio"/> our clients' requests or policy <input type="radio"/> other, explain						
<input type="radio"/> 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. <input type="radio"/> We hire service provider(s) that make voting decisions on our behalf.						

LEA 16.2	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 ourselves and thus we make sure that our voting policy is applied. Elo's ownership policy steering group provides guidance on AGM practices.

LEA 16.3	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 19	Voluntary	Additional Assessed	PRI 2
LEA 19.1	Indicate if your organisation has a securities lending programme.		
	Private		

LEA 20	Mandatory	Core Assessed	PRI 2
LEA 20.1	Indicate whether you or the service providers acting on your behalf raise any concerns with companies ahead of voting		
	<input checked="" type="checkbox"/> Yes, in most cases <input type="checkbox"/> Sometimes, in the following cases: <input type="checkbox"/> Neither we nor our service provider raise concerns with companies ahead of voting		
LEA 20.2	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.		
	<input checked="" type="checkbox"/> Yes, in most cases <input type="checkbox"/> Sometimes, in the following cases. <input type="checkbox"/> We do not communicate the rationale to companies <input type="checkbox"/> Not applicable because we and/or our service providers do not abstain or vote against management recommendations		
LEA 20.3	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 21	Mandatory	Core Assessed	PRI 2				
LEA 21.1	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.						
	<input checked="" type="checkbox"/> We do track or collect this information						
	<table border="1"> <tr> <td>Votes cast (to the nearest 1%)</td> </tr> <tr> <td>89%</td> </tr> <tr> <td>Specify the basis on which this percentage is calculated</td> </tr> <tr> <td> <input type="radio"/> of the total number of ballot items on which you could have issued instructions <input checked="" type="radio"/> of the total number of company meetings at which you could have voted <input type="radio"/> of the total value of your listed equity holdings on which you could have voted </td> </tr> </table>			Votes cast (to the nearest 1%)	89%	Specify the basis on which this percentage is calculated	<input type="radio"/> of the total number of ballot items on which you could have issued instructions <input checked="" type="radio"/> of the total number of company meetings at which you could have voted <input type="radio"/> of the total value of your listed equity holdings on which you could have voted
Votes cast (to the nearest 1%)							
89%							
Specify the basis on which this percentage is calculated							
<input type="radio"/> of the total number of ballot items on which you could have issued instructions <input checked="" type="radio"/> of the total number of company meetings at which you could have voted <input type="radio"/> of the total value of your listed equity holdings on which you could have voted							
LEA 21.2	Explain your reason(s) for not voting certain holdings						
	<input type="checkbox"/> Shares were blocked <input type="checkbox"/> Notice, ballots or materials not received in time <input type="checkbox"/> 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)
- On request by clients
- Other

We do not track or collect this information

LEA 22	Mandatory	Additional Assessed	PRI 2
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LEA 22.1 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 22.2 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	90%
Against (opposing) management recommendations	10%
Abstentions	0%

LEA 22.3 Describe the actions you take in relation to voting against management recommendations.

Some of the actions taken: we informed companies beforehand, engaged with other investors afterwards, used voting decision making as a tool for portfolio managers to learn more of the Company.

No, we do not track this information

LEA 22.4 Additional information. [Optional]

The number is counted based on number of meetings and not number of ballot items.

LEA 23	Voluntary	Descriptive	PRI 2
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LEA 23.1 Indicate if your organisation directly or via a service provider filed or co-filed any ESG shareholder resolutions during the reporting year.

Private

LEA 23.6 Describe whether your organisation reviews ESG shareholder resolutions filed by other investors.

Private

LEA 23.7 Additional information. [Optional]

Private

FI 01.1 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	0	Screening alone
	0	Thematic alone
	0	Integration alone
	100	Screening + integration strategies
	0	Thematic + integration strategies
	0	Screening + thematic strategies
	0	All three strategies combined
	0	No incorporation strategies applied
Corporate (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
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 01.2 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 02 Mandatory to Report, Voluntary to Disclose Core Assessed PRI 1

FI 02.1 Indicate which ESG factors you systematically research as part of your analysis on issuers.

Private

FI 02.2 Indicate what format your ESG information comes in and where you typically source it

Private

FI 02.3 Provide a brief description of the ESG information used, highlighting any differences in sources of information across your ESG incorporation strategies.

Private

FI 02.4 Additional information. [Optional]

Private

FI 03 Mandatory Additional Assessed PRI 1

FI 03.1 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 03.2 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 04 Mandatory Gateway PRI 1

FI 04.1 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"/>

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

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.

In SSA we pursue to avoid making investments in the lowest quartile countries based on the Corruption Perception Index.

FI 05 Mandatory Descriptive PRI 1

FI 05.1 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 05.2	Describe your approach to ESG-based negative screening of issuers from your investable universe.
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 06	Voluntary	Additional Assessed	PRI 1
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FI 06.1	Provide examples of how ESG factors are included in your screening criteria.
Private	

FI 06.2	Additional information.
Private	

FI 07	Mandatory	Core Assessed	PRI 1
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FI 07.1	Indicate which systems your organisation has to ensure that fund screening criteria are not breached in fixed income investments.
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Type of screening	Checks
Negative/exclusionary screening?	<input checked="" type="checkbox"/> Checks are performed to ensure that issuers meet screening criteria <input checked="" type="checkbox"/> We ensure that 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
Positive/best-in-class screening	<input checked="" type="checkbox"/> Checks are performed to ensure that issuers meet screening criteria <input checked="" type="checkbox"/> We ensure that 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
Norms-based screening	<input checked="" type="checkbox"/> Checks are performed to ensure that issuers meet screening criteria <input checked="" type="checkbox"/> We ensure that 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 08	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1
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FI 08.1	Indicate what proportion of your thematic investments are:
Private	

FI 08.2	Describe your organisation's approach to thematic fixed income investing
Private	

FI 08.3	Additional information [OPTIONAL]
Private	

FI 09	Mandatory	Core Assessed	PRI 1
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FI 09.1	Indicate whether you encourage transparency and disclosure relating to the issuance of themed bonds as per the Green Bonds Principles, Social Bond Principles, or Sustainability Bond Guidelines..
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- We require that themed bond proceeds are only allocated to environmentally or socially beneficial projects
- We require the issuer (or 3rd party assurer) to demonstrate a process which determines the eligibility of projects to which themed bond proceeds are allocated
- We require issuers to demonstrate a systematic and transparent process of disbursing themed bond proceeds to eligible projects until all funds are allocated
- We require issuers to report at least once per year on the projects to which proceeds have been allocated including a description of those projects
- Other, specify
- None of the above

FI 09.2	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 10	Mandatory	Additional Assessed	PRI 1
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FI 10.1	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 11	Mandatory	Descriptive	PRI 1
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FI 11.1	Describe your approach to integrating ESG into traditional financial analysis.
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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 11.2	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.
 Global Adaptation Index by Dotre Dame University is used to gauge environmental issues within our 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 12	Mandatory	Core Assessed	PRI 1
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FI 12.1	Indicate how ESG information is typically used as part of your investment process.
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	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 checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
ESG analysis is regularly featured in internal research notes or similar	<input checked="" 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 checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other, specify	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

FI 13	Mandatory	Additional Assessed	PRI 1
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FI 13.1	Indicate the extent to which ESG issues are reviewed in your integration process.
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	Environment	Social	Governance
SSA	Environmental	Social	Governance
	<input checked="" type="checkbox"/> Systematically <input type="checkbox"/> Occasionally <input type="checkbox"/> Not at all	<input checked="" type="checkbox"/> Systematically <input type="checkbox"/> Occasionally <input type="checkbox"/> Not at all	<input checked="" type="checkbox"/> Systematically <input type="checkbox"/> Occasionally <input type="checkbox"/> Not at all

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

FI 13.2 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. ND-GAIN Index is being investigated as a data source. 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 have 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 15 Mandatory to Report, Voluntary to Disclose Core Assessed PRI 2

FI 15.1 Indicate the proportion of your fixed income assets on which you engage. Please exclude any engagements carried out solely in your capacity as a shareholder.

Private

FI 15.3 Additional information.[OPTIONAL]

Private

FI 16 Mandatory to Report, Voluntary to Disclose Additional Assessed PRI 1,2

FI 16.1 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 16.2 Indicate how your organisation prioritises engagements with issuers

Private

FI 16.3 Indicate when your organisation conducts engagements with issuers.

Private

FI 16.4 Indicate how your organisation conducts engagements with issuers.

Private

FI 16.5 Indicate what your organisation conducts engagements with issuers on.

Private

FI 16.6 Indicate how your organisation shares the outcomes of the engagements internally.

Private

FI 16.7 Additional information.[OPTIONAL]

Private

FI 17 Mandatory to Report, Voluntary to Disclose Additional Assessed PRI 1,2

FI 17.1 Indicate if your publicly available policy documents explicitly refer to fixed income engagement separately from engagements in relation to other asset classes.

Private

FI 17.3 Additional information [OPTIONAL]

Private

FI 18 Mandatory to Report, Voluntary to Disclose Additional Assessed General

FI 18.1 Indicate whether your organisation measures how your incorporation of ESG analysis in fixed income has affected investment outcomes and/or ESG performance.

Private

FI 18.2 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 18.3

Additional information.[OPTIONAL]

Private

FI 19	Voluntary	Descriptive	PRI 1,2
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FI 19.1

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 19.2

Additional information.

Private

PR 01	Mandatory	Core Assessed	PRI 1-6
PR 01.1	Indicate if your organisation has a Responsible Property Investment (RPI) policy.		
	<input checked="" type="checkbox"/> Yes		
PR 01.2	Provide a URL or attach the document		
	<input checked="" type="checkbox"/> URL https://www.elo.fi/tietoa-elosta/sjoitukset/elon-vastuullisuus-sjoitustoiminnassa		
	<input type="checkbox"/> Attach Document		
	<input type="radio"/> No		
PR 01.3	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.		
	<p>In direct property, responsible investment criteria is linked to considering new investments and managing the 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.</p> <p>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.</p> <p>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.</p>		
PR 04	Mandatory	Gateway/Core Assessed	PRI 1
PR 04.1	Indicate if your organisation typically incorporates ESG issues when selecting property investments.		
	<input checked="" type="checkbox"/> Yes		
PR 04.2	Provide a description of your organisation's approach to incorporating ESG issues in property investment selection.		
	<p>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 analyse ESG issues in property investment selection.</p> <p>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 analysing environmental, technical and juridical issues. The process is the same regardless of property type or location.</p>		
PR 04.3	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.		
	<input checked="" type="checkbox"/> Environmental Energy efficiency Contamination Indoor environmental quality		
	<input checked="" type="checkbox"/> Social Accessibility Health, Safety and wellbeing Occupier Satisfaction		
	<input checked="" type="checkbox"/> Governance Shareholder structure & rights Conflicts of interest Supply chain governance		
	<input type="radio"/> No		
PR 05	Voluntary	Additional Assessed	PRI 1,3
PR 05.1	Indicate what type of ESG information your organisation typically considers during your property investment selection process.		
	Private		
PR 05.2	Provide a brief description of how this ESG information was incorporated into your investment selection process.		
	Private		
PR 06	Mandatory	Core Assessed	PRI 1
PR 06.1	Indicate if ESG issues impacted your property investment selection process during the reporting year.		
	<input checked="" type="checkbox"/> ESG issues helped identify risks and/or opportunities for value creation		
	<input checked="" type="checkbox"/> 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 06.2 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 07 **Mandatory** **Core Assessed** **PRI 4**

PR 07.1 Indicate if your organisation includes ESG issues in your selection, appointment and/or monitoring of third-party property managers.

Yes

PR 07.2 Indicate how your organisation includes ESG issues in your selection, appointment and/or monitoring of third party property managers.

Selection process of property managers incorporated ESG issues

Types of actions

- Request explanation of how ESG is effectively integrated, including inquiries about governance and processes
- Request track records and examples of how the manager implements ESG in their asset and property management
- Discuss property level out-performance opportunities through greater integration of ESG criteria
- Request explanation of engaging stakeholders on ESG issues
- Other, explain

Coverage

- >75% to 100%
- >50% to 75%
- >25% to 50%
- >0% to 25%

Contractual requirements when appointing property managers includes ESG issues

Types of actions

- Include clear and detailed expectations for incorporating ESG
- Require dedicated ESG procedures in all relevant asset and property management phases
- Clear ESG reporting requirements
- Clear ESG performance targets
- Other, explain

Coverage

- >75% to 100%
- >50% to 75%
- >25% to 50%
- >0% to 25%

Monitoring of property managers covers ESG responsibilities and implementation

Types of actions

- Performance against quantitative and material environmental / resource targets over specified timeframe.
- Performance against quantitative and material environmental / resource targets against relevant benchmarks
- Performance against quantitative and qualitative targets to address social impacts of the portfolio/investment,
- Other, explain

Coverage

- >75% to 100%
- >50% to 75%
- >25% to 50%

- No
- >0% to 25%

PR 07.3 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.

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 corporate responsibility and environmental initiatives as well as employee equality programs, 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.

During the reporting year 2017 we carried out a major restructuring of residential properties' management.

PR 08 Mandatory Gateway PRI 2

PR 08.1 Indicate if your organisation, and/or property managers, considers ESG issues in post-investment activities relating to your property assets.

Yes

PR 08.2 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 08.3 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 through 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. waste management improvements, 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.

With one of our main management partner we have established a cooperation group consisting of Elo's and managers' key personnel in order to develop implementation of energy and environmental issues.

No

PR 09 Mandatory Core Assessed PRI 2,3

PR 09.1 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 09.2 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	Extended installations of new technology equipment to decrease water consumption
Waste amounts and recycling	Improvements in waste management facilities etc. Education offered for tenants.

Social

Target/KPI	Progress Achieved
Tenant satisfaction	Slightly increased tenant satisfaction. We have updated processes concerning activities linked to customer relationships such as property management, leasing, lease administration

Governance

Target/KPI	Progress Achieved
Potential deficiencies in grey economy prevention (partner selection, tax compliance etc.)	No major defects or risks identified
Conflict of interest considerations	Issues during the reporting year handled according to operation protocols and transparent decision-making

We do not set and/or monitor against targets

PR 09.3 Additional information. [Optional]

During the reporting year, we conducted calculation of carbon dioxide emissions for the majority of our portfolio in property level. Target for energy consumption reduction in the portfolio was set to -7,5% by year 2025.

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

PR 10	Voluntary	Descriptive	PRI 2
PR 10.1	Indicate whether your property assets are assessed against certification schemes, ratings and/or benchmarks		
<i>Private</i>			
PR 10.3	Indicate if your organisation uses property specific reporting standards to disclose information related to your property investments' ESG performance.		
<i>Private</i>			
PR 10.4	Additional information.		
<i>Private</i>			

PR 11	Mandatory	Core Assessed	PRI 2
PR 11.1	Indicate the proportion of active property developments and major renovations where ESG issues have been considered.		
<input type="radio"/> >90% of active developments and major renovations <input checked="" type="radio"/> 51-90% of active developments and major renovations <input type="radio"/> 10-50% of active developments and major renovations <input type="radio"/> <10% of active developments and major renovations <input type="radio"/> N/A, no developments and major renovations of property assets are active			
PR 11.2	Indicate if the following ESG considerations are typically implemented and monitored in your property developments and major renovations.		
<input checked="" type="checkbox"/> Environmental site selection requirements <input checked="" type="checkbox"/> Environmental site development requirements <input checked="" type="checkbox"/> Sustainable construction materials <input checked="" type="checkbox"/> Water efficiency requirements <input checked="" type="checkbox"/> Energy efficiency requirements <input type="checkbox"/> Energy generation from on-site renewable sources <input checked="" type="checkbox"/> Waste management plans at sites <input checked="" type="checkbox"/> Health and safety management systems at sites <input checked="" type="checkbox"/> Construction contractors comply with sustainability guidelines <input type="checkbox"/> Resilient building design and orientation <input type="checkbox"/> Other, specify			

PR 12	Mandatory	Core Assessed	PRI 2
PR 12.1	Indicate the proportion of property occupiers your organisation, and/or your property managers, engaged with on ESG issues during the reporting year.		
<input type="radio"/> >90% of occupiers <input type="radio"/> 50-90% of occupiers <input checked="" type="radio"/> 10-50% of occupiers <input type="radio"/> <10% of occupiers			
PR 12.2	Indicate if the following practises and areas are typically part of your, and/or your property managers', occupier engagements.		
<input checked="" type="checkbox"/> Distribute a sustainability guide to occupiers <input checked="" type="checkbox"/> Organise occupier events focused on increasing sustainability awareness <input checked="" type="checkbox"/> Deliver training on energy and water efficiency <input checked="" type="checkbox"/> Deliver training on waste minimisation <input checked="" type="checkbox"/> Provide feedback on energy and water consumption and/or waste generation <input checked="" type="checkbox"/> Provide feedback on waste generation <input checked="" type="checkbox"/> Carry out occupier satisfaction surveys <input type="checkbox"/> Offer green leases <input type="checkbox"/> Other, specify			

PR 12.3	Additional information. [Optional]
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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 13	Voluntary	Additional Assessed	PRI 2
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PR 13.1	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.
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- >90% of leases or MoUs
- 50-90% of leases or MoUs
- 10-50% of leases or MoUs
- <10% of leases or MoUs
- 0% of leases or MoUs
- N/A, no leases or MoUs were signed during the reporting year

PR 13.2	Additional information.
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We provide guidance for tenants in environmental efficiency objectives by providing for example sustainability guides and tips. In many properties, we have certifications (LEED), which require many ESG related operations such as improved waste management, energy efficiency monitoring etc. These operations and initiation of certificates is done in cooperation with our tenants. Tenants are also committed in environmental efficiency objectives in many properties through maintenance rents.

PR 14	Voluntary	Additional Assessed	PRI 2
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PR 14.1	Indicate what proportion of property assets your organisation, and/or your property managers, engaged with the community on ESG issues during the reporting year.
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Private

PR 14.2	Indicate if the following areas and activities are typically part of your, and/or your property managers', community engagement.
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Private

PR 14.3	Additional information.
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Private

PR 15	Voluntary	Additional Assessed	PRI 1,2
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PR 15.1	Indicate whether your organisation measures how your approach to responsible investment in property investments has affected financial and/or ESG performance.
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Private

PR 15.3	Describe how you are able to determine these outcomes.
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Private

PR 16	Voluntary	Descriptive	PRI 1,3
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PR 16.1	Provide examples of ESG issues that affected your property investments during the reporting year.
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Private

PR 16.2	Additional information. [Optional]
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Private

INF 01	Voluntary	Descriptive	PRI 1-6
INF 01.1	Provide a brief overview of your organisation's approach to responsible investment in infrastructure where you have equity stakes.		
	Private		
INF 02	Mandatory	Core Assessed	PRI 1-6
INF 02.1	Indicate if your organisation has a responsible investment policy for infrastructure.		
	<input checked="" type="checkbox"/> Yes		
INF 02.2	Provide a URL if your policy is publicly available.		
	https://www.unpri.org/organisation/elo-mutual-pension-insurance-company-142427		
	<input type="checkbox"/> No		
INF 05	Mandatory	Gateway	PRI 1
INF 05.1	Indicate if your organisation typically incorporates ESG issues when selecting infrastructure investments.		
	<input checked="" type="checkbox"/> Yes		
INF 05.2	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 06	Voluntary	Descriptive	PRI 1,4
INF 06.1	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.		
	Private		
INF 06.2	Additional information.		
	Private		
INF 07	Mandatory	Core Assessed	PRI 1,3
INF 07.1	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		
	Environmental permits for wind parks. Maintenance and clearance work for electricity distribution lines. Certification of forests.		
	<input checked="" type="checkbox"/> Social		
	Health and safety issues. Elderly care in nursing housing. Respecting native peoples life style in planning of wind parks.		
	<input checked="" type="checkbox"/> Governance		
	Selecting board members. Co-operation with regulators. Work with the balance between regulations and what is generally accepted by the public.		
INF 08	Voluntary	Additional Assessed	PRI 1,3
INF 08.1	Indicate what type of ESG information your organisation typically considers during your infrastructure investment selection process.		
	Private		
INF 08.2	Additional information.		
	Private		
INF 09	Voluntary	Additional Assessed	PRI 1
INF 09.1	Indicate if ESG issues impacted your infrastructure investment selection processes during the reporting year.		
	Private		
INF 09.2	Indicate how ESG issues impacted your infrastructure investment deal structuring processes during the reporting year.		
	Private		
INF 09.3	Additional information.		
	Private		
INF 10	Mandatory	Core Assessed	PRI 4

INF 10.1	Indicate if your organisation includes ESG issues in your selection, appointment and/or monitoring of third-party operators.
<input checked="" type="checkbox"/> Yes	
INF 10.2	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 type="radio"/> For all third-party operators <input checked="" type="radio"/> For a majority of third-party operators <input type="radio"/> For a minority of third-party operators	
<input checked="" type="checkbox"/> Contractual requirements when appointing third-party operators includes ESG issues	
<input type="radio"/> For all third-party operators <input checked="" type="radio"/> For a majority of third-party operators <input type="radio"/> For a minority of third-party operators	
<input checked="" type="checkbox"/> Monitoring of third-party operators covers ESG responsibilities and implementation	
<input type="radio"/> For all third-party operators <input checked="" type="radio"/> For a majority of third-party operators <input type="radio"/> For a minority of third-party operators	
<input type="radio"/> No	

INF 11	Mandatory	Gateway	PRI 2
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INF 11.1	Indicate whether your organisation and/or operators consider ESG issues in post-investment activities relating to your infrastructure assets.
<input checked="" type="checkbox"/> Yes	
INF 11.2	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 11.3	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 and follow-up processes.	
<input type="radio"/> No	

INF 12	Mandatory	Core Assessed	PRI 2
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INF 12.1	Indicate the proportion of infrastructure assets for which your organisation and/or operators included ESG performance in investment monitoring during the reporting year.
<input checked="" type="radio"/> >90% of infrastructure assets <input type="radio"/> 51-90% of infrastructure assets <input type="radio"/> 10-50% of infrastructure assets <input type="radio"/> <10% of infrastructure assets	
INF 12.2	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 Accidents concerning oil spills Share of certified forests	
<input checked="" type="checkbox"/> Social Health and safety Meetings of different stakeholder groups	
<input checked="" type="checkbox"/> Governance Gender of board members Evaluation of the work of the board of directors Employee satisfaction surveys	
<input type="checkbox"/> We do not set and/or monitor against targets	
INF 12.3	Additional information. [Optional]
The setting of targets and reporting varies a lot from case to case. In some cases it is a precise monthly report and in other cases it is a yearly summary of the situation and an assessment of the direction.	

INF 13	Mandatory	Additional Assessed	PRI 2
INF 13.1	Indicate whether you track the proportion of your infrastructure investees that have an ESG/sustainability-related policy (or similar guidelines).		
	<input checked="" type="checkbox"/> Yes		
INF 13.2	Indicate the proportion of your infrastructure investees that have an ESG/sustainability-related policy (or similar guidelines).		
	<input checked="" type="checkbox"/> >90% of infrastructure investees <input type="checkbox"/> 51-90% of infrastructure investees <input type="checkbox"/> 10-50% of infrastructure investees <input type="checkbox"/> >0% and <10% of infrastructure investees <input type="checkbox"/> 0% of infrastructure investees		
	<input type="checkbox"/> No		
INF 14	Voluntary	Descriptive	PRI 2,3
INF 14.1	Indicate the type and frequency of reports you request and/or receive from infrastructure investees covering ESG issues.		
	<i>Private</i>		
INF 14.2	Additional information.		
	<i>Private</i>		
INF 15	Mandatory	Core Assessed	PRI 2
INF 15.1	Indicate the proportion of active infrastructure maintenance projects where ESG issues have been considered.		
	<input type="checkbox"/> >90% of active maintenance projects <input checked="" type="checkbox"/> 51-90% of active maintenance projects <input type="checkbox"/> 10-50% of active maintenance projects <input type="checkbox"/> <10% of active maintenance projects <input type="checkbox"/> N/A, no maintenance projects of infrastructure assets are active		
INF 16	Voluntary	Additional Assessed	PRI 2
INF 16.1	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.		
	<i>Private</i>		
INF 16.2	Describe your approach to stakeholder engagements in relation to your infrastructure assets.		
	<i>Private</i>		
INF 17	Voluntary	Additional Assessed	PRI 1,2
INF 17.1	Indicate whether your organisation measures how your approach to responsible investment in Infrastructure investments has affected financial and/or ESG performance.		
	<i>Private</i>		
INF 18	Voluntary	Descriptive	PRI 1,3
INF 18.1	Provide examples of ESG issues that affected your infrastructure investments during the reporting year.		
	<i>Private</i>		
INF 18.2	Additional information.		
	<i>Private</i>		

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		
	I would like to attach an organisation chart (the following image formats can be uploaded: .jpg, .png, .bmp and .gif)		
	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="radio"/> Yes		
IFD 14.2	Indicate what percentage of your direct portfolio in debt is invested in the investee's local currency.		
	<input type="radio"/> >80%		
	<input type="radio"/> No		
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:		

- 12 months or fewer
- <20
- 13 to 24 months
- 25 to 60 months
- Over 60 months

IFD 17	Mandatory	Core Assessed	PIIF 3
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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
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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
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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
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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"> <input checked="" type="checkbox"/> For all inclusive finance investments <input type="checkbox"/> For a majority of inclusive finance investments <input type="checkbox"/> For a minority of inclusive finance investments 			
IFD 23.2	Describe how your procedure to integrate the consideration of environmental issues in your investment decisions processes affect decisions pre-investment. [Optional]		
The higher the potential environmental risk is assessed (either industry related and/or company specific risk) the more it affects decisions at the pre-investment stage.			
<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.

No

IFD 32 Mandatory Core Assessed PIIIF 7

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

Yes
 No

The Smart Campaign

Yes
 No

Social Performance Task Force

Yes
 No

Financial Inclusion Equity Council (formerly CMEF)

Yes
 No

European Microfinance Platform (eMFP)

Yes
 No

Global Impact Investors Network (GIIN)

Yes
 No

IFD 33 Voluntary Additional Assessed PIIIF 7

IFD 33.1 Indicate if you encourage your investees to be a member of/endorse the following:

Private

IFD 33.2 Additional information.

Private

IFD 34 Voluntary Additional Assessed PIIIF 7

IFD 34.1 Indicate if you encourage your investees to participate in initiatives which contribute to the development of industry benchmarks.

Private

IFD 34.2 Additional information.

Private

CM1 01.1	Mandatory	Core Assessed	General
CM1 01.1	Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:		
<input type="checkbox"/> Third party assurance over selected responses from this year's PRI Transparency Report <input type="checkbox"/> Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year <input type="checkbox"/> Third party assurance or audit of the implementation of RI processes (that have been reported to the PRI this year) <input type="checkbox"/> Internal audit conducted by internal auditors of the implementation of RI processes and/or RI data that have been reported to the PRI this year) <input checked="" type="checkbox"/> Internal verification of responses before submission to the PRI (e.g. by the CEO or the board) <ul style="list-style-type: none"> <input type="radio"/> Whole PRI Transparency Report has been internally verified <input checked="" type="radio"/> Selected data has been internally verified <input checked="" type="checkbox"/> Other, specify Compliance officer, Head of Equities, Head of Responsible investment <input type="checkbox"/> None of the above			
CM1 01.2 & 01.8	Mandatory	Descriptive	Planned assurance of this year's PRI Transparency Report
CM1 01.2	Do you plan to conduct third party assurance of this year's PRI Transparency report?		
<input type="radio"/> Whole PRI Transparency Report will be assured <input type="radio"/> Selected data will be assured <input checked="" type="checkbox"/> We do not plan to assure this year's PRI Transparency report			
CM1 01.3 & 01.9	Mandatory	Descriptive	General
CM1 01.3	We undertook third party assurance on last year's PRI Transparency Report		
<input type="radio"/> Whole PRI Transparency Report was assured last year <input type="radio"/> Selected data was assured in last year's PRI Transparency Report <input checked="" type="checkbox"/> We did not assure last year's PRI Transparency report, or we did not have such a report last year.			
CM1 01.4, 10:12	Mandatory	Descriptive	General
CM1 01.4	We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:		
<input type="checkbox"/> We adhere to an RI certification or labelling scheme <input type="checkbox"/> We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report <input type="checkbox"/> ESG audit of holdings <input type="checkbox"/> Other, specify <input checked="" type="checkbox"/> None of the above			
CM1 01.7	Mandatory	Descriptive	General
CM1 01.7	Indicate who has reviewed/verified internally the whole - or selected data of the - PRI Transparency Report . and if this applies to selected data please specify what data was reviewed		
<input checked="" type="checkbox"/> CEO or other Chief-Level staff			
		Sign-off or review of responses	
<input checked="" type="checkbox"/> Sign-off <input type="checkbox"/> Review of responses			
		What data has been verified	
<input checked="" type="checkbox"/> Policies <input checked="" type="checkbox"/> Overarching strategy and processes <input type="checkbox"/> Asset class specific processes <input type="checkbox"/> Quantitative data related to RI processes <input type="checkbox"/> Other			
		Relevant modules	
<input checked="" type="checkbox"/> Organisational Overview			
		Corresponding Indicator number	
All indicators			

- Strategy and Governance

Corresponding Indicator number
All indicators

- Indirect – Manager Selection, Appointment and Monitoring
- Direct - Listed Equity Incorporation
- Direct - Listed Equity Active Ownership
- Direct - Fixed Income
- Direct - Property
- Direct - Infrastructure
- Direct - Inclusive Finance

- The Board
- Investment Committee
- Compliance Function

What data has been verified

- Policies
- Overarching strategy and processes
- Asset class specific processes
- Quantitative data related to RI processes
- Other

Relevant modules

- Organisational Overview

Corresponding Indicator number
All indicators

- Strategy and Governance

Corresponding Indicator number
All indicators

- Indirect – Manager Selection, Appointment and Monitoring

Corresponding Indicator number
All indicators

- Direct - Listed Equity Incorporation

Corresponding Indicator number
All indicators

- Direct - Listed Equity Active Ownership

Corresponding Indicator number
All indicators

- Direct - Fixed Income

Corresponding Indicator number
All indicators

- Direct - Property

Corresponding Indicator number
All indicators

- Direct - Infrastructure

Corresponding Indicator number
All indicators

- Direct - Inclusive Finance

Corresponding Indicator number
All indicators

- RI/ESG Team

What data has been verified

- Policies

- Overarching strategy and processes
- Asset class specific processes
- Quantitative data related to RI processes
- Other

Relevant modules

- Organisational Overview

Corresponding Indicator number
All indicators

- Strategy and Governance

Corresponding Indicator number
All indicators

- Indirect – Manager Selection, Appointment and Monitoring

Corresponding Indicator number
All indicators

- Direct - Listed Equity Incorporation

Corresponding Indicator number
All indicators

- Direct - Listed Equity Active Ownership

Corresponding Indicator number
All indicators

- Direct - Fixed Income

Corresponding Indicator number
All indicators

- Direct - Property

Corresponding Indicator number
All indicators

- Direct - Infrastructure

Corresponding Indicator number
All indicators

- Direct - Inclusive Finance

Corresponding Indicator number
All indicators

- Investment Teams
- Legal Department
- Other (specify)

What data has been verified

- Policies
- Overarching strategy and processes
- Asset class specific processes
- Quantitative data related to RI processes
- Other

Relevant modules

- Organisational Overview

Corresponding Indicator number
Head of Equities: all indicators

- Strategy and Governance

Corresponding Indicator number
Head of Equities: all indicators

- Indirect – Manager Selection, Appointment and Monitoring

Corresponding Indicator number

Head of Equities: all indicators

Direct - Listed Equity Incorporation

Corresponding Indicator number

Head of Equities: all indicators

Direct - Listed Equity Active Ownership

Corresponding Indicator number

Head of Equities: all indicators

Direct - Fixed Income

Direct - Property

Direct - Infrastructure

Direct - Inclusive Finance

CM1 01.13 Additional information for all confidence building measures [OPTIONAL]

C-level staff: member of Elo's Executive Group.