



LEA 02	Discretionary	Gateway
<p>Reason for interaction</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> To support investment decisionmaking in & company related ESG issues <input checked="" type="checkbox"/> To enhance corporate practice or identify the need to enhance corporate practice <input type="checkbox"/> Other specify <input type="checkbox"/> We do not engage via internal staff <input type="checkbox"/> To support investment decisionmaking in & company related ESG issues <input type="checkbox"/> To enhance corporate practice or identify the need to enhance corporate practice <input type="checkbox"/> Other specify 	<p>Type of engagement</p> <p>Individual/internal staff engagements</p> <p>Collaborative engagements</p> <p>Service provider engagements</p>	<p>Reason for interaction</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> To support investment decisionmaking in & company related ESG issues <input checked="" type="checkbox"/> To enhance corporate practice or identify the need to enhance corporate practice <input type="checkbox"/> Other specify <input type="checkbox"/> We do not engage via internal staff <input type="checkbox"/> To support investment decisionmaking in & company related ESG issues <input type="checkbox"/> To enhance corporate practice or identify the need to enhance corporate practice <input type="checkbox"/> Other specify

RI TRANSPARENCY REPORT

2020

Elo Mutual Pension Insurance Company

About this report

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

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

PRI disclaimer

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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).

500

OO 02.4 Additional information. [Optional]

Our company as a whole. Previously we reported only FTE for the investment organisation.

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.

31/12/2019

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

Total AUM

25,340,100,000 EUR

27932425102 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 and investment strategies:

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

Fund of hedge funds	0	0
Forestry	0	<10%
Farmland	0	0
Inclusive finance	0	0
Cash	0	0
Money market instruments	<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.
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- as percentage breakdown
- as broad ranges

OO 06.3	Indicate whether your organisation has any off-balance sheet assets [Optional].
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- Yes
- No

OO 06.5	Indicate whether your organisation uses fiduciary managers.
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- Yes, we use a fiduciary manager and our response to OO 5.1 is reflective of their management of our assets.
- No, we do not use fiduciary managers.

OO 07	Mandatory to Report, Voluntary to Disclose	Gateway	General
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Private

OO 08	Mandatory to Report, Voluntary to Disclose	Peering	General
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Private

OO 09	Mandatory	Peering	General
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OO 09.1	Indicate the breakdown of your organisation's AUM by market.
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88

Developed Markets

12

Emerging Markets

0

Frontier Markets

0

Other Markets

OO 10	Mandatory	Gateway	General
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OO 10.1	Select the active ownership activities your organisation implemented in the reporting year.
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Listed equity – engagement

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

Listed equity – voting

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

Fixed income SSA – engagement

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

not.

Fixed income Corporate (financial) – engagement
<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).
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Listed equity
<input checked="" type="checkbox"/> We address ESG incorporation. <input type="checkbox"/> We do not do ESG incorporation.
Fixed income - SSA
<input checked="" type="checkbox"/> We address ESG incorporation. <input type="checkbox"/> We do not do ESG incorporation.
Fixed income - corporate (financial)
<input checked="" type="checkbox"/> We address ESG incorporation. <input type="checkbox"/> We do not do ESG incorporation.
Fixed income - corporate (non-financial)
<input checked="" type="checkbox"/> We address ESG incorporation. <input type="checkbox"/> We do not do ESG incorporation.
Property
<input checked="" type="checkbox"/> We address ESG incorporation. <input type="checkbox"/> We do not do ESG incorporation.
Infrastructure
<input checked="" type="checkbox"/> We address ESG incorporation. <input type="checkbox"/> We do not do ESG incorporation.
Money market instruments
<input type="checkbox"/> We address ESG incorporation. <input checked="" type="checkbox"/> We do not do ESG incorporation.

OO 11.2	Select the externally managed assets classes in which you and/or your investment consultants address ESG incorporation in your external manager selection, appointment and/or monitoring processes.
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Asset class	ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes
Listed equity	Listed equity - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes
	<input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation
Fixed income - SSA	Fixed income - SSA - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes
	<input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation

Fixed income - corporate (financial)	<p>Fixed income - corporate (financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation
Fixed income - corporate (non-financial)	<p>Fixed income - corporate (non-financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation
Private equity	<p>Private equity - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation
Property	<p>Property - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation
Infrastructure	<p>Infrastructure - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation
Hedge funds	<p>Hedge funds - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation
Forestry	<p>Forestry - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation

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

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

40	Passive
21	Active - quantitative (quant)
39	Active - fundamental and active - other

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

SSA	<input type="checkbox"/> Passive	60
	<input type="checkbox"/> Active - quantitative (quant)	0
	<input type="checkbox"/> Active - fundamental and active - other	40
Corporate (financial)	<input type="checkbox"/> Passive	0
	<input type="checkbox"/> Active - quantitative (quant)	0
	<input type="checkbox"/> Active - fundamental and active - other	100
Corporate (non-financial)	<input type="checkbox"/> Passive	0
	<input type="checkbox"/> Active - quantitative (quant)	0
	<input type="checkbox"/> Active - fundamental and active - other	100

OO FI 03 Mandatory Descriptive General

OO FI 03.1 Indicate the approximate (+/- 5%) breakdown of your SSA investments, by developed markets and emerging markets.

SSA	<input type="checkbox"/> Developed markets	40
	<input type="checkbox"/> Emerging markets	60

OO FI 03.2 Indicate the approximate (+/- 5%) breakdown of your corporate and securitised investments by investment grade or high-yield securities.

Type	Investment grade (+/- 5%)	High-yield (+/- 5%)	Total internally managed
Corporate (financial)	<input checked="" type="checkbox"/> >50% <input type="checkbox"/> 10-50% <input type="checkbox"/> <10% <input type="checkbox"/> 0%	<input type="checkbox"/> >50% <input checked="" type="checkbox"/> 10-50% <input type="checkbox"/> <10% <input type="checkbox"/> 0%	100%

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

Private

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

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="checkbox"/> >50% <input type="checkbox"/> 10-50% <input checked="" type="checkbox"/> <10% <input type="checkbox"/> 0%
Managed via third-party property managers appointed by you	<input checked="" type="checkbox"/> >50% <input type="checkbox"/> 10-50% <input type="checkbox"/> <10% <input type="checkbox"/> 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	Mandatory to Report, Voluntary to Disclose	Descriptive	General
<i>Private</i>			
OO INF 01	Mandatory to Report, Voluntary to Disclose	Descriptive	General
<i>Private</i>			
OO INF 02	Mandatory to Report, Voluntary to Disclose	Gateway/Peering	General
<i>Private</i>			
OO INF 03	Mandatory to Report, Voluntary to Disclose	Descriptive	General
<i>Private</i>			
OO Checks			Checks

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

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

SG 01.2	Indicate the components/types and coverage of your policy.
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Policy components/types	Coverage by AUM
<input checked="" type="checkbox"/> Policy setting out your overall approach	
<input checked="" type="checkbox"/> Formalised guidelines on environmental factors	
<input type="checkbox"/> Formalised guidelines on social factors	
<input type="checkbox"/> Formalised guidelines on corporate governance factors	
<input type="checkbox"/> Fiduciary (or equivalent) duties	
<input checked="" type="checkbox"/> Asset class-specific RI guidelines	<input type="radio"/> Applicable policies cover all AUM
<input type="checkbox"/> Sector specific RI guidelines	<input checked="" type="radio"/> Applicable policies cover a majority of AUM
<input checked="" type="checkbox"/> Screening / exclusions policy	<input type="radio"/> Applicable policies cover a minority of AUM
<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
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- 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
- Understanding and incorporating client / beneficiary sustainability preferences
- Other RI considerations, specify (1)
- Other RI considerations, specify (2)

SG 01.4	Describe your organisation's investment principles and overall investment strategy, interpretation of fiduciary (or equivalent) duties, and how they consider ESG factors and real economy impact.
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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]
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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

Private

SG 02.1	Indicate which of your investment policy documents (if any) are publicly available. Provide a URL and an attachment of the document.
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- Policy setting out your overall approach

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

- Asset class-specific RI guidelines

- Screening / exclusions policy

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

- Engagement policy

- (Proxy) voting policy

- 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-investment-operations
<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-investment-operations
<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-investment-operations
<input type="checkbox"/> Attachment	

- ESG incorporation approaches

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

- Active ownership approaches

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

- Reporting

URL/Attachment	
<input checked="" type="checkbox"/> URL	https://www.elo.fi/about-elo/financial-information

Attachment

Climate change

URL/Attachment

URL

<https://www.elo.fi/about-elo/investments/responsibility-in-investment-operations>

Attachment

We do not publicly disclose any investment policy components

SG 02.3 Additional information [Optional].

In 2019 we updated our documents for RI and ownership policy.

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

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

Private

SG 07 Mandatory Core Assessed General

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

Roles

Board members or trustees

Oversight/accountability for responsible investment

Implementation of responsible investment

No oversight/accountability or implementation responsibility for responsible investment

Internal Roles (triggers other options)

Select from the below internal roles

Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee

Oversight/accountability for responsible investment

Implementation of responsible investment

No oversight/accountability or implementation responsibility for responsible investment

Other Chief-level staff or head of department, specify

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
- 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
- Investor relations
- Other role, specify (1)
- Other role, specify (2)
- External managers or service providers
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment

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

Board members, CEO, CIO and Executive Group of Investments have an oversight responsibility for responsible investment. The investment organisation is reporting regularly to the Board.

Elo's Board of Directors approves the company's principles of responsible investing, ownership policy and climate strategy documents. 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 heads of different asset classes. The steering group of responsible investments is responsible for developing and coordinating ESG-practices at Elo.

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

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

1

SG 07.4 Additional information. [Optional]

Head of Equity

SG 07 CC	Mandatory to Report, Voluntary to Disclose	Descriptive	General
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Private

SG 08	Voluntary	Additional Assessed	General
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Private

SG 09	Mandatory	Core Assessed	PRI 4,5
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SG 09.1 Select the collaborative organisation and/or initiatives of which your organisation is a member or in which it participated during the reporting year, and the role you played.

- 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 Monitoring and Reporting working group

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

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

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, participated on the CDP non-disclosure Campaign and we signature of the Investor Action Request Initiative.
<input checked="" type="checkbox"/>	CDP Forests
	Your organisation's role in the initiative during the reporting period (see definitions)
	Basic
<input checked="" type="checkbox"/>	CDP Water
	Your organisation's role in the initiative during the reporting period (see definitions)
	Basic
<input type="checkbox"/>	CFA Institute Centre for Financial Market Integrity
<input checked="" type="checkbox"/>	Climate Action 100+
	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]
	Participation in engagements
<input type="checkbox"/>	Code for Responsible Investment in SA (CRISA)
<input type="checkbox"/>	Council of Institutional Investors (CII)
<input type="checkbox"/>	Eumedion
<input type="checkbox"/>	Extractive Industries Transparency Initiative (EITI)
<input type="checkbox"/>	ESG Research Australia
<input type="checkbox"/>	Invest Europe Responsible Investment Roundtable
<input type="checkbox"/>	Global Investors Governance Network (GIGN)
<input type="checkbox"/>	Global Impact Investing Network (GIIN)
<input type="checkbox"/>	Global Real Estate Sustainability Benchmark (GRESB)
<input type="checkbox"/>	Green Bond Principles
<input type="checkbox"/>	HKVCA: ESG Committee
<input checked="" type="checkbox"/>	Institutional Investors Group on Climate Change (IIGCC)
	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]
	Elo is taking part of the IIGCC Paris Aligned Investment Initiative.
	Elo signed a joint letter to the EU leaders on Carbon neutrality and Paris goals and to Governments on Climate change.
	Collaboration with IIGCC/Climate Action 100+ addressed Shell's AGM to set more detailed goals for climate change, BP and Glencore.
<input type="checkbox"/>	Interfaith Center on Corporate Responsibility (ICCR)
<input type="checkbox"/>	International Corporate Governance Network (ICGN)
<input type="checkbox"/>	Investor Group on Climate Change, Australia/New Zealand (IGCC)
<input type="checkbox"/>	International Integrated Reporting Council (IIRC)
<input type="checkbox"/>	Investor Network on Climate Risk (INCR)/CERES
<input type="checkbox"/>	Local Authority Pension Fund Forum
<input type="checkbox"/>	Principles for Financial Action in the 21st Century
<input type="checkbox"/>	Principles for Sustainable Insurance
<input checked="" type="checkbox"/>	Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify
	Finland's Sustainable Investment Forum, FINSIF FFI responsibility Committee and 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.
	Elo is also a member of the FFI Responsibility Committee.
<input type="checkbox"/>	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)	
Moderate	

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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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

Description
Elo's trainee program for University students

Frequency of contribution
<input type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input checked="" type="radio"/> Annually

- Less frequently than annually
- Ad hoc
- Other

Provided input and/or collaborated with academia on RI related work

Description
Taking part in master thesis' interviews regarding RI.

Frequency of contribution

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc
- Other

Encouraged better transparency and disclosure of responsible investment practices across the investment industry

Description
DD-questionnaire for asset managers

Frequency of contribution

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc
- Other

Spoke publicly at events and conferences to promote responsible investment

Description
Spoke at different events and seminars about responsible investment and Elo's approach.

Frequency of contribution

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc
- Other

Wrote and published in-house research papers on responsible investment

Encouraged the adoption of the PRI

Description
DD-questionnaire for asset managers

Frequency of contribution

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc
- Other

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 and participated Finance Finland TCFD reporting recommendations for Finnish financial institutions.

Frequency of contribution

- Quarterly or more frequently
- Biannually
- Annually

- Less frequently than annually
- Ad hoc
- Other

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

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc
- Other

A member of PRI advisory committees/ working groups, specify

Description
Member of Private Equity Monitoring and Reporting working group in 2017

Frequency of contribution

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc
- Other

On the Board of, or officially advising, other RI organisations (e.g. local SIFs)

Description
Nomination Committee of Finsif Board member of National Steering Group of Impact Investing

Frequency of contribution

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc
- Other

Other, specify

No

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

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

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

Asset class

- Listed Equity (LE)
- Fixed income - SSA
- Fixed income - Corporate (financial)
- Fixed income - Corporate (non-financial)
- Private equity (PE)
- Infrastructure (INF)
- Property (PR)

- Other asset classes
- We use investment consultants in our monitoring of external managers

Asset class
<input type="checkbox"/> Listed Equity (LE)
<input type="checkbox"/> Fixed income - SSA
<input type="checkbox"/> Fixed income - Corporate (financial)
<input type="checkbox"/> Fixed income - Corporate (non-financial)
<input type="checkbox"/> Private equity (PE)
<input type="checkbox"/> Infrastructure (INF)
<input type="checkbox"/> Property (PR)
<input checked="" type="checkbox"/> Other asset classes

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

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

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

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

- Custodial services
- Investment policy development
- Strategic asset allocation
- Investment research

Describe how responsible investment is incorporated

Data service, filtering, screening and rating on ESG matters

- Other, specify (1)
- Other, specify (2)
- Other, specify (3)
- None of the above

- No, we do not use investment consultants.

SG 13	Mandatory	Descriptive	PRI 1
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SG 13.1 Indicate whether the organisation carries out scenario analysis and/or modelling, and if it does, provide a description of the scenario analysis (by asset class, sector, strategic asset allocation, etc.).

- Yes, in order to assess future ESG factors
- Yes, in order to assess future climate-related risks and opportunities

Describe

Climate scenario analysis in SAA and asset classes.

- No, our organisation does not currently carry out scenario analysis and/or modelling

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

- Allocation between asset classes
- Determining fixed income duration
- Allocation of assets between geographic markets
- Sector weightings
- Other, specify
- We do not consider ESG issues in strategic asset allocation

SG 13 CC	Mandatory to Report, Voluntary to Disclose	Descriptive	General
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SG 14	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1
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Private

SG 14 CC	Voluntary		General
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Private

SG 15	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1
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Private

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.

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	<p>Forestry 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.</p>		

SG 18	Voluntary	Descriptive	General
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Private

SG 19	Mandatory	Core Assessed	PRI 2, 6
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SG 19.1 Indicate whether your organisation typically discloses asset class specific information proactively. Select the frequency of the disclosure to clients/beneficiaries and the public, and provide a URL to the public information.

Selection, Appointment and Monitoring	
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"/> 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-investment-operations>
<https://www.elo.fi/about-elo/financial-information>

Listed equity - Incorporation

Do you disclose?

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

The information disclosed to clients/beneficiaries is the same

- Yes
- No

Disclosure to public and URL

Disclosure to public and URL

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

Annually

<https://www.elo.fi/about-elo/investments/responsibility-in-investment-operations>
<https://www.elo.fi/about-elo/financial-information>

Listed equity - Engagement

Do you disclose?

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

The information disclosed to clients/beneficiaries is the same

- Yes
- No

Disclosure to public and URL

Disclosure to public and URL

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

Disclosure of collaborative engagements, membership in investor coalitions like IIGCC etc.

Annually

<https://www.elo.fi/about-elo/financial-information>
<https://www.elo.fi/about-elo/investments/elos-ownership-policy>

Listed equity – (Proxy) Voting

Do you disclose?

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

The information disclosed to clients/beneficiaries is the same

Yes

No

Disclosure to public and URL

Disclosure to public and URL

Disclose all voting decisions

Disclose some voting decisions

Only disclose abstentions and votes against management

Annually

<https://www.elo.fi/about-elo/investments/elos-ownership-policy>
<https://www.elo.fi/about-elo/financial-information>

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/financial-information>
<https://www.elo.fi/about-elo/investments/responsibility-in-investment-operations>

Property

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 clients/beneficiaries
<p>Disclosure to public and URL</p> <p><input type="checkbox"/> ESG information on how you select property investments</p> <p><input checked="" type="checkbox"/> ESG information on how you monitor and manage property investments</p> <p><input checked="" type="checkbox"/> Information on your property investments' ESG performance</p> <p><input type="checkbox"/> Other</p>	<p>Disclosure to clients/beneficiaries</p> <p><input type="checkbox"/> ESG information on how you select property investments</p> <p><input type="checkbox"/> ESG information on how you monitor and manage property investments</p> <p><input checked="" type="checkbox"/> Information on your property investments' ESG performance</p> <p><input checked="" type="checkbox"/> Other</p> <p>Specify</p> <p>Client-specific consumption figures</p>
Annually	Annually
<p>https://www.elo.fi/about-elo/investments/responsibility-in-investment-operations https://www.elo.fi/about-elo/financial-information</p>	

Infrastructure	
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 type="checkbox"/> ESG information on how you select infrastructure investments <input checked="" type="checkbox"/> ESG information on how you monitor and manage infrastructure investments <input type="checkbox"/> Information on your infrastructure investments' ESG performance	
Annually	
https://www.elo.fi/about-elo/financial-information https://www.elo.fi/about-elo/investments/responsibility-in-investment-operations	

SG 19.2 Additional information [Optional]

Further information can be found on Elo's website (<https://www.elo.fi/about-elo/investments/responsibility-in-investment-operations>) 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 and responsibility report (<https://www.elo.fi/about-elo/financial-information>).

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

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

Active investment strategies				
Active investment strategies	Listed Equity	FI - SSA	FI - Corporate (financial)	FI - Corporate (non-financial)
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	FI - Corporate (non-financial)
Screening	<input type="checkbox"/>	<input type="checkbox"/>
Thematic	<input type="checkbox"/>	<input type="checkbox"/>
Integration	<input type="checkbox"/>	<input type="checkbox"/>
None of the above	<input checked="" type="checkbox"/>	<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
Your organisation's investment strategy and how ESG objectives relate to it	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
ESG incorporation requirements	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
ESG reporting requirements	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
No RI information covered in the selection documentation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Strategy							
	LE	FI - SSA	FI - Corporate (financial)	FI - Corporate (non-financial)	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 checked="" 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 checked="" 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 checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Review and agree the use of ESG data in the investment decision making process	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Review and agree manager's ESG risk framework	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Review and agree 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Review process for defining and communicating on ESG incidents	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Review and agree ESG reporting frequency and detail	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other, specify	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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

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

	LE	FI - SSA	FI - Corporate (financial)	FI - Corporate (non-financial)	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 checked="" 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 checked="" 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"/>

You selected an 'Other' option in table SAM 02.4 above, please specify

When selecting external managers we assess the manager's overall approach towards RI. We prefer managers that are PRI 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.

LE: Reporting on controversial weapons and tobacco is required.

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
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- Sets standard benchmarks or ESG benchmarks
- Defines ESG objectives and/ or ESG related exclusions/restrictions
- Sets incentives and controls linked to the ESG objectives
- Requires reporting on ESG objectives
- Requires the investment manager to adhere to ESG guidelines, regulations, principles or standards
- Other, specify (1)
- Other, specify (2)

	specify
--	---------

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

- None of the above

SAM 04.2	Provide an example per asset class of your benchmarks, objectives, incentives/controls and reporting requirements that would typically be included in your managers' appointment.
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	Asset class
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- Listed equity (LE)
- Fixed income - SSA (SSA)
- Fixed income - Corporate (financial)

	Benchmark
--	------------------

- We do not set benchmarks

	ESG Objectives
--	-----------------------

- ESG guidelines/regulation, principles/standards, specify

Part of our DD process Elo analyses fund investments also from an ESG perspective. In specific DD questions we ask if the fund has 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? We also ask if the fund report on ESG-related risks and if they have standard ESG reporting. Or if the fund does have implemented an environmental strategy. We expect the managers to be UNPRI signatories.

- We do not define ESG objectives

	Incentives and controls
--	--------------------------------

- We do not set incentives and controls

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

- Fixed income - Corporate (non-financial)

	Benchmark
--	------------------

- We do not set benchmarks

	ESG Objectives
--	-----------------------

- ESG guidelines/regulation, principles/standards, specify

Part of our DD process Elo analyses fund investments also from an ESG perspective. In specific DD questions we ask if the fund has 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? We also ask if the fund report on ESG-related risks and if they have standard ESG reporting. Or if the fund does have implemented an environmental strategy. We expect the managers to be UNPRI signatories.

We do not define ESG objectives

Incentives and controls

We do not set incentives and controls

Reporting requirements

Ad-hoc/when requested

Annually

Bi-annually

Quarterly

Monthly

Private equity

Property

Infrastructure

SAM 04.3 Indicate which of these actions your organisation might take if any of the requirements are not met

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

SAM 05 Mandatory Core Assessed PRI 1

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

	LE	FI - SSA	FI - Corporate (financial)	FI - Corporate (non-financial)	Private equity	Property	Infrastructure
ESG objectives linked to investment strategy (with examples)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Evidence on how the ESG incorporation strategy(ies) affected the investment decisions and financial / ESG performance of the portfolio/fund	<input 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 checked="" 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 checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Metrics on the real economy influence of the investments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PRI Transparency Reports	<input type="checkbox"/>	<input type="checkbox"/>	<input 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"/>
Changes to the oversight and responsibilities of ESG implementation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" 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

Private Equity: Case studies provided by the manager

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 checked="" type="checkbox"/>	<input type="checkbox"/>

ESG weight	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 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

LE and FI: We monitor broadly managers' practices regarding ESG. We also monitor the underlying holdings of the funds.

Private equity: depending on team size, we urge small managers to define their own ESG guideline, to show a commitment to the issue while lacking the resources 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
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Private

SAM 09	Mandatory	Additional Assessed	PRI 1,6
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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	Query about managers climate strategy.
Outcomes	Better understanding of implementation of climate strategies

Add Example 2

Topic or issue	Climate strategy
Conducted by	Internal staff
Asset class	Fixed income – corporate (non financial)
Scope and process	Query about managers climate strategy.
Outcomes	Better understanding of implementation of climate strategies

Add Example 3

Add Example 4

Add Example 5

Add Example 6

Add Example 7

We are not able to provide examples

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

LEI 01	Mandatory	Gateway	PRI 1			
LEI 01.1	Indicate which ESG incorporation strategy and/or combination of strategies you apply to your actively managed listed equities; and the breakdown of your actively managed listed equities by strategy or combination of strategies.					
	<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					
	<table border="1"> <tr> <td>Percentage of active listed equity to which the strategy is applied – you may estimate +/- 5%</td> <td>100%</td> </tr> </table>			Percentage of active listed equity to which the strategy is applied – you may estimate +/- 5%	100%	
Percentage of active listed equity to which the strategy is applied – you may estimate +/- 5%	100%					
	<input type="checkbox"/> We do not apply incorporation strategies					
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 one 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, tobacco and companies deriving 25% or more revenue from the mining of thermal coal or from the thermal coal based power generation. We also apply norms based screening and different kind of positive and negative screening based on various ESG- criteria.</p>					
LEI 02	Voluntary	Additional Assessed	PRI 1			
	Private					
LEI 03	Voluntary	Additional Assessed	PRI 1			
	Private					
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					
	<input checked="" type="checkbox"/> Product <input checked="" type="checkbox"/> Activity <input checked="" 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					
	<table border="1"> <thead> <tr> <th>Description</th> </tr> </thead> <tbody> <tr> <td>Exclusions: Controversial weapons, tobacco and companies deriving 25% or more revenue from the mining of thermal coal or from the thermal coal based power generation.</td> </tr> <tr> <td>Other screening: E,S and G-performance, Climate change related e.g. CO2- emissions, sanction lists, AGM analysis</td> </tr> </tbody> </table>			Description	Exclusions: Controversial weapons, tobacco and companies deriving 25% or more revenue from the mining of thermal coal or from the thermal coal based power generation.	Other screening: E,S and G-performance, Climate change related e.g. CO2- emissions, sanction lists, AGM analysis
Description						
Exclusions: Controversial weapons, tobacco and companies deriving 25% or more revenue from the mining of thermal coal or from the thermal coal based power generation.						
Other screening: E,S and G-performance, Climate change related e.g. CO2- emissions, sanction lists, AGM analysis						
	<input checked="" type="checkbox"/> Positive/best-in-class screening					
	<input checked="" type="checkbox"/> Product <input checked="" type="checkbox"/> Activity <input checked="" 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					
	<table border="1"> <thead> <tr> <th>Description</th> </tr> </thead> <tbody> <tr> <td>Positive environmental and social impact, Climate change related e.g. CO2- emissions</td> </tr> </tbody> </table>			Description	Positive environmental and social impact, Climate change related e.g. CO2- emissions	
Description						
Positive environmental and social impact, Climate change related e.g. CO2- emissions						
	<input checked="" type="checkbox"/> Norms-based screening					
	<input checked="" type="checkbox"/> UN Global Compact Principles <input checked="" type="checkbox"/> The UN Guiding Principles on Business and Human Rights <input checked="" type="checkbox"/> International Labour Organization Conventions <input checked="" type="checkbox"/> United Nations Convention Against Corruption <input checked="" type="checkbox"/> OECD Guidelines for Multinational Enterprises <input checked="" type="checkbox"/> 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 in social, environmental and governance topics.	
LEI 04.2	Describe how you notify clients and/or beneficiaries when changes are made to your screening criteria.		
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
LEI 05.1	Indicate which processes your organisation uses to ensure ESG screening is based on robust analysis.		
<input checked="" type="checkbox"/> Comprehensive ESG research is undertaken or sourced to determine companies' activities and products. <input checked="" type="checkbox"/> Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies. <input type="checkbox"/> 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. <input checked="" type="checkbox"/> Third-party ESG ratings are updated regularly to ensure that portfolio holdings comply with fund policies. <input checked="" type="checkbox"/> Trading platforms blocking / restricting flagged securities on the black list. <input type="checkbox"/> A committee, body or similar with representatives independent of the individuals who conduct company research reviews some or all screening decisions. <input checked="" type="checkbox"/> A periodic review of internal research is carried out. <input checked="" type="checkbox"/> Review and evaluation of external research providers. <input type="checkbox"/> Other; specify <input type="checkbox"/> 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.		
<input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90%			
LEI 05.3	Indicate how frequently third party ESG ratings are updated for screening purposes.		
<input type="radio"/> Quarterly or more frequently <input checked="" type="radio"/> Bi-Annually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually			
LEI 05.4	Indicate how frequently you review internal research that builds your ESG screens.		
<input type="radio"/> Quarterly or more frequently <input checked="" type="radio"/> Bi-Annually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually			
LEI 06	Voluntary	Additional Assessed	PRI 1
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 sustainable theme fund or mandate. Instead we have a broader sustainability theme for all of our investments which includes both risks and opportunities. For example, 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 the proportion of actively managed listed equity portfolios where E, S and G factors are systematically researched as part of your investment analysis.		
ESG issues	Proportion impacted by analysis		

Environmental	<div style="background-color: #0070C0; color: white; padding: 2px;">Environmental</div> <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90%
Social	<div style="background-color: #0070C0; color: white; padding: 2px;">Social</div> <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90%
Corporate Governance	<div style="background-color: #0070C0; color: white; padding: 2px;">Corporate Governance</div> <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90%

LEI 08.2	Additional information. [Optional]
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ESG- issues are taken into a account in every investment decision and analysis.

LEI 09	Mandatory	Core Assessed	PRI 1
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LEI 09.1	Indicate which processes your organisation uses to ensure ESG integration 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
- Third-party ESG ratings are updated regularly
- A periodic review of the internal research is carried out
- Structured, regular ESG specific meetings between responsible investment staff and the fund manager or within the investments team
- ESG risk profile of a portfolio against benchmark
- Analysis of the impact of ESG factors on investment risk and return performance
- Other; specify
- None of the above

LEI 09.2	Indicate the proportion of your actively managed listed equity portfolio that is subject to comprehensive ESG research as part your integration strategy.
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- <10%
- 10-50%
- 51-90%
- >90%

LEI 09.3	Indicate how frequently third party ESG ratings that inform your ESG integration strategy are updated.
----------	--

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

LEI 09.5	Describe how ESG information is held and used by your portfolio managers.
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- ESG information is held within centralised databases or tools, and it is accessible by all relevant staff
- ESG information or analysis is a standard section or aspect of all company research notes or industry/sector analysis generated by investment staff
- Systematic records are kept that capture how ESG information and research were incorporated into investment decisions
- Other; specify
- None of the above

LEI 10	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 1
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Private

LEI 11	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1
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Private

LEI 12	Voluntary	Descriptive	PRI 1
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Private

LEI 13	Voluntary	Descriptive	PRI 1
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Private

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

LEA 01	Mandatory	Core Assessed	PRI 2																																																												
LEA 01.1	Indicate whether your organisation has an active ownership policy (includes engagement and/or voting).																																																														
	<input checked="" type="checkbox"/> Yes																																																														
LEA 01.2	Attach or provide a URL to your active ownership 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 active engagement policy covers:																																																														
	<table border="1"> <tr> <th colspan="2">General approach to Active Ownership</th> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Conflicts of interest</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Alignment with national stewardship code requirements</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Assets/funds covered by active ownership policy</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Expectations and objectives</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Engagement approach</td> </tr> <tr> <th colspan="2">Engagement</th> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>ESG issues</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Prioritisation of engagement</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Methods of engagement</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Transparency of engagement activities</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Due diligence and monitoring process</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Insider information</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Escalation strategies</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Service Provider specific criteria</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Other, (specify)</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>(Proxy) voting approach</td> </tr> <tr> <th colspan="2">Voting</th> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>ESG issues</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Prioritisation and scope of voting activities</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Methods of voting</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Transparency of voting activities</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Regional voting practice approaches</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Filing or co-filing resolutions</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Company dialogue pre/post-vote</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Decision-making processes</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Securities lending processes</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Other, (specify)</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Other</td> </tr> <tr> <td><input type="checkbox"/></td> <td>None of the above</td> </tr> </table>			General approach to Active Ownership		<input checked="" type="checkbox"/>	Conflicts of interest	<input checked="" type="checkbox"/>	Alignment with national stewardship code requirements	<input checked="" type="checkbox"/>	Assets/funds covered by active ownership policy	<input checked="" type="checkbox"/>	Expectations and objectives	<input checked="" type="checkbox"/>	Engagement approach	Engagement		<input checked="" type="checkbox"/>	ESG issues	<input checked="" type="checkbox"/>	Prioritisation of engagement	<input checked="" type="checkbox"/>	Methods of engagement	<input checked="" type="checkbox"/>	Transparency of engagement activities	<input checked="" type="checkbox"/>	Due diligence and monitoring process	<input checked="" type="checkbox"/>	Insider information	<input checked="" type="checkbox"/>	Escalation strategies	<input checked="" type="checkbox"/>	Service Provider specific criteria	<input type="checkbox"/>	Other, (specify)	<input checked="" type="checkbox"/>	(Proxy) voting approach	Voting		<input checked="" type="checkbox"/>	ESG issues	<input checked="" type="checkbox"/>	Prioritisation and scope of voting activities	<input checked="" type="checkbox"/>	Methods of voting	<input checked="" type="checkbox"/>	Transparency of voting activities	<input checked="" type="checkbox"/>	Regional voting practice approaches	<input checked="" type="checkbox"/>	Filing or co-filing resolutions	<input checked="" type="checkbox"/>	Company dialogue pre/post-vote	<input checked="" type="checkbox"/>	Decision-making processes	<input checked="" type="checkbox"/>	Securities lending processes	<input type="checkbox"/>	Other, (specify)	<input type="checkbox"/>	Other	<input type="checkbox"/>	None of the above
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<input checked="" type="checkbox"/>	Transparency of voting activities																																																														
<input checked="" type="checkbox"/>	Regional voting practice approaches																																																														
<input checked="" type="checkbox"/>	Filing or co-filing resolutions																																																														
<input checked="" type="checkbox"/>	Company dialogue pre/post-vote																																																														
<input checked="" type="checkbox"/>	Decision-making processes																																																														
<input checked="" type="checkbox"/>	Securities lending processes																																																														
<input type="checkbox"/>	Other, (specify)																																																														
<input type="checkbox"/>	Other																																																														
<input type="checkbox"/>	None of the above																																																														
	<input type="checkbox"/> No																																																														
LEA 01.4	Do you outsource any of your active ownership activities to service providers?																																																														
	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No																																																														
LEA 01.6	Additional information [optional]																																																														
	<p>Elo's engagement policy is described in Elo's ownership policy and Elo's principles of responsible investing.</p> <p>We have updated our ownership policy and principles of responsible investing last year which are published on our web-site.</p>																																																														

LEA 02	Mandatory	Core Assessed	PRI 1,2,3				
LEA 02.1	Indicate the method of engagement, giving reasons for the interaction.						
	<table border="1"> <thead> <tr> <th>Type of engagement</th> <th>Reason for interaction</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>			Type of engagement	Reason for interaction		
Type of engagement	Reason for interaction						

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

LEA 03	Mandatory	Core Assessed	PRI 2
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LEA 03.1 Indicate whether your organisation has a formal process for identifying and prioritising engagements.

Yes

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

Type of engagement	Criteria used to identify/prioritise engagements		
Individual / Internal staff engagements	<table border="1"> <thead> <tr> <th>Individual / Internal staff engagements</th> </tr> </thead> <tbody> <tr> <td> <input checked="" type="checkbox"/> Geography/market of the companies <input checked="" type="checkbox"/> Materiality of the ESG factors <input checked="" type="checkbox"/> Exposure (size of holdings) <input checked="" type="checkbox"/> Responses to ESG impacts that have already occurred <input type="checkbox"/> Responses to divestment pressure <input type="checkbox"/> Consultation with clients/beneficiaries <input type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) <input checked="" type="checkbox"/> Follow-up from a voting decision <input type="checkbox"/> Client request <input checked="" type="checkbox"/> Breaches of international norms <input type="checkbox"/> Other; (specify) <input type="checkbox"/> We do not outline engagement criteria for our individual engagements </td> </tr> </tbody> </table>	Individual / Internal staff engagements	<input checked="" type="checkbox"/> Geography/market of the companies <input checked="" type="checkbox"/> Materiality of the ESG factors <input checked="" type="checkbox"/> Exposure (size of holdings) <input checked="" type="checkbox"/> Responses to ESG impacts that have already occurred <input type="checkbox"/> Responses to divestment pressure <input type="checkbox"/> Consultation with clients/beneficiaries <input type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) <input checked="" type="checkbox"/> Follow-up from a voting decision <input type="checkbox"/> Client request <input checked="" type="checkbox"/> Breaches of international norms <input type="checkbox"/> Other; (specify) <input type="checkbox"/> We do not outline engagement criteria for our individual engagements
	Individual / Internal staff engagements		
<input checked="" type="checkbox"/> Geography/market of the companies <input checked="" type="checkbox"/> Materiality of the ESG factors <input checked="" type="checkbox"/> Exposure (size of holdings) <input checked="" type="checkbox"/> Responses to ESG impacts that have already occurred <input type="checkbox"/> Responses to divestment pressure <input type="checkbox"/> Consultation with clients/beneficiaries <input type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) <input checked="" type="checkbox"/> Follow-up from a voting decision <input type="checkbox"/> Client request <input checked="" type="checkbox"/> Breaches of international norms <input type="checkbox"/> Other; (specify) <input type="checkbox"/> We do not outline engagement criteria for our individual engagements			
<table border="1"> <thead> <tr> <th>Collaborative engagements</th> </tr> </thead> <tbody> <tr> <td> <input checked="" type="checkbox"/> Potential to enhance knowledge of ESG issues through other investors <input checked="" type="checkbox"/> Ability to have greater impact on ESG issues <input type="checkbox"/> Ability to add value to the collaboration <input checked="" type="checkbox"/> Geography/market of the companies targeted by the collaboration <input checked="" type="checkbox"/> Materiality of the ESG factors addressed by the collaboration <input checked="" type="checkbox"/> Exposure (size of holdings) to companies targeted by the collaboration <input checked="" type="checkbox"/> Responses to ESG impacts addressed by the collaboration that have already occurred <input type="checkbox"/> Responses to divestment pressure <input checked="" type="checkbox"/> Follow-up from a voting decision <input type="checkbox"/> Alleviate the resource burden of engagement <input type="checkbox"/> Consultation with clients/beneficiaries <input type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) <input type="checkbox"/> Other; (specify) <input type="checkbox"/> We do not outline engagement criteria for our collaborative engagement providers </td> </tr> </tbody> </table>	Collaborative engagements	<input checked="" type="checkbox"/> Potential to enhance knowledge of ESG issues through other investors <input checked="" type="checkbox"/> Ability to have greater impact on ESG issues <input type="checkbox"/> Ability to add value to the collaboration <input checked="" type="checkbox"/> Geography/market of the companies targeted by the collaboration <input checked="" type="checkbox"/> Materiality of the ESG factors addressed by the collaboration <input checked="" type="checkbox"/> Exposure (size of holdings) to companies targeted by the collaboration <input checked="" type="checkbox"/> Responses to ESG impacts addressed by the collaboration that have already occurred <input type="checkbox"/> Responses to divestment pressure <input checked="" type="checkbox"/> Follow-up from a voting decision <input type="checkbox"/> Alleviate the resource burden of engagement <input type="checkbox"/> Consultation with clients/beneficiaries <input type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) <input type="checkbox"/> Other; (specify) <input type="checkbox"/> We do not outline engagement criteria for our collaborative engagement providers	
Collaborative engagements			
<input checked="" type="checkbox"/> Potential to enhance knowledge of ESG issues through other investors <input checked="" type="checkbox"/> Ability to have greater impact on ESG issues <input type="checkbox"/> Ability to add value to the collaboration <input checked="" type="checkbox"/> Geography/market of the companies targeted by the collaboration <input checked="" type="checkbox"/> Materiality of the ESG factors addressed by the collaboration <input checked="" type="checkbox"/> Exposure (size of holdings) to companies targeted by the collaboration <input checked="" type="checkbox"/> Responses to ESG impacts addressed by the collaboration that have already occurred <input type="checkbox"/> Responses to divestment pressure <input checked="" type="checkbox"/> Follow-up from a voting decision <input type="checkbox"/> Alleviate the resource burden of engagement <input type="checkbox"/> Consultation with clients/beneficiaries <input type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) <input type="checkbox"/> Other; (specify) <input type="checkbox"/> We do not outline engagement criteria for our collaborative engagement providers			

No

LEA 04	Mandatory	Core Assessed	PRI 2
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LEA 04.1 Indicate whether you define specific objectives for your organisation's engagement activities.

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

LEA 05	Mandatory	Core Assessed	PRI 2
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LEA 05.1 Indicate whether you monitor and/or review engagement outcomes.

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

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

Individual / Internal staff engagements	<input checked="" type="checkbox"/> Define timelines/milestones for your objectives <input checked="" type="checkbox"/> Track and/or monitor progress against defined objectives and/or KPIs <input checked="" type="checkbox"/> Track and/or monitor the progress of action taken when original objectives are not met <input type="checkbox"/> Revisit and, if necessary, revise objectives on a continuous basis <input type="checkbox"/> Other; specify
Collaborative engagements	<input checked="" type="checkbox"/> Define timelines/milestones for your objectives <input checked="" type="checkbox"/> Track and/or monitor progress against defined objectives and/or KPIs <input checked="" type="checkbox"/> Track and/or monitor the progress of action taken when original objectives are not met <input type="checkbox"/> Revisit and, if necessary, revise objectives on a continuous basis <input type="checkbox"/> Other; specify

LEA 06	Mandatory	Additional Assessed	PRI 2,4
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LEA 06.1 Indicate whether your organisation has an escalation strategy when engagements are unsuccessful.

Yes

LEA 06.2 Indicate the escalation strategies used at your organisation following unsuccessful engagements.

- Collaborating with other investors
- Issuing a public statement
- Filing/submitting a shareholder resolution
- Voting against the re-election of the relevant directors
- Voting against the board of directors or the annual financial report
- Submitting nominations for election to the board
- Seeking legal remedy / litigation
- Reducing exposure (size of holdings)
- Divestment
- Other; specify

No

LEA 07	Voluntary	Additional Assessed	PRI 1,2
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LEA 07.1 Indicate whether insights gained from your organisation's engagements are shared with investment decision-makers.

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 07.2 Indicate the practices used to ensure that information and insights gained through engagements are shared with investment decision-makers.

- Involving investment decision-makers when developing an engagement programme
- Holding investment team meetings and/or presentations
- Using IT platforms/systems that enable data sharing
- Internal process that requires portfolio managers to re-balance holdings based on interaction and outcome levels
- Other; specify
 We have RI Steering Group for sharing information across investment organisation
- None

LEA 07.3 Indicate whether insights gained from your organisation's engagements are shared with your clients/beneficiaries.

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

LEA 07.4 Additional information. [Optional]

LEA 08 Mandatory Gateway PRI 2

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

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

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

Private

LEA 10 Voluntary Additional Assessed PRI 2

Private

LEA 11 Voluntary Descriptive PRI 2

Private

LEA 12 Mandatory Descriptive PRI 2

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

Approach

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

		Based on	
		<input type="radio"/> The service-provider voting policy we sign off on <input checked="" type="radio"/> Our own voting policy <input type="radio"/> Our clients' requests or policies <input type="radio"/> Other (explain)	
		<input type="radio"/> We hire service providers who make voting decisions on our behalf, except in some pre-defined scenarios where we review and make voting decisions. <input type="radio"/> We hire service providers who make voting decisions on our behalf.	
LEA 12.2	Provide an overview of how you ensure that your agreed-upon voting policy is adhered to, giving details of your approach when exceptions to the policy are made.		
	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 12.3	Additional information.[Optional]		
	In Finland we use mainly our own research and make voting decisions without the use of service providers. Outside of Finland we use our service provider to provide us broad 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 14	Voluntary	Additional Assessed	PRI 2
	Private		
LEA 15	Mandatory	Descriptive	PRI 2
LEA 15.1	Indicate the proportion of votes participated in within the reporting year in which where you or the service providers acting on your behalf raised concerns with companies ahead of voting.		
	<input type="radio"/> 100% <input type="radio"/> 99-75% <input type="radio"/> 74-50% <input type="radio"/> 49-25% <input checked="" type="radio"/> 24-1% <input type="radio"/> Neither we nor our service provider(s) raise concerns with companies ahead of voting		
LEA 15.2	Indicate the reasons for raising your concerns with these companies ahead of voting.		
	<input type="checkbox"/> Vote(s) concerned selected markets <input checked="" type="checkbox"/> Vote(s) concerned selected sectors <input checked="" type="checkbox"/> Vote(s) concerned certain ESG issues <input checked="" type="checkbox"/> Vote(s) concerned companies exposed to controversy on specific ESG issues <input type="checkbox"/> Vote(s) concerned significant shareholdings <input type="checkbox"/> Client request <input type="checkbox"/> Other		
LEA 16	Mandatory	Core Assessed	PRI 2
LEA 16.1	Indicate the proportion of votes where you, and/or the service provider(s) acting on your behalf, communicated the rationale to companies for abstaining or voting against management recommendations. Indicate this as a percentage out of all eligible votes.		
	<input type="radio"/> 100% <input checked="" type="radio"/> 99-75% <input type="radio"/> 74-50% <input type="radio"/> 49-25% <input type="radio"/> 24-1% <input type="radio"/> We do not communicate the rationale to companies <input type="radio"/> Not applicable because we and/or our service providers did not abstain or vote against management recommendations		
LEA 16.2	Indicate the reasons why your organisation would communicate to companies, the rationale for abstaining or voting against management recommendations.		
	<input type="checkbox"/> Vote(s) concern selected markets <input checked="" type="checkbox"/> Vote(s) concern selected sectors <input checked="" type="checkbox"/> Vote(s) concern certain ESG issues <input checked="" type="checkbox"/> Vote(s) concern companies exposed to controversy on specific ESG issues <input type="checkbox"/> Vote(s) concern significant shareholdings <input type="checkbox"/> Client request <input type="checkbox"/> Other		

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

LEA 16.4	Additional information. [Optional]
Regarding domestic companies we communicate ourselves and in other countries our proxy-adviser communicates with the companies.	

LEA 17	Mandatory	Core Assessed	PRI 2
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LEA 17.1	For listed equities in which you or your service provider have the mandate to issue (proxy) voting instructions, indicate the percentage of votes cast during the reporting year.				
<input checked="" type="radio"/> We do track or collect this information					
	<table border="1"> <tr> <td></td> <td>Votes cast (to the nearest 1%)</td> </tr> <tr> <td>98%</td> <td></td> </tr> </table>		Votes cast (to the nearest 1%)	98%	
	Votes cast (to the nearest 1%)				
98%					
	<table border="1"> <tr> <td></td> <td>Specify the basis on which this percentage is calculated</td> </tr> <tr> <td colspan="2"> <input type="radio"/> Of the total number of ballot items on which you could have issued instructions <input checked="" type="radio"/> Of the total number of company meetings at which you could have voted <input type="radio"/> Of the total value of your listed equity holdings on which you could have voted </td> </tr> </table>		Specify the basis on which this percentage is calculated	<input type="radio"/> Of the total number of ballot items on which you could have issued instructions <input checked="" type="radio"/> Of the total number of company meetings at which you could have voted <input type="radio"/> Of the total value of your listed equity holdings on which you could have voted	
	Specify the basis on which this percentage is calculated				
<input type="radio"/> Of the total number of ballot items on which you could have issued instructions <input checked="" type="radio"/> Of the total number of company meetings at which you could have voted <input type="radio"/> Of the total value of your listed equity holdings on which you could have voted					
<input type="radio"/> We do not track or collect this information					

LEA 17.2	Explain your reason(s) for not voting on certain holdings
<input type="checkbox"/> Shares were blocked <input type="checkbox"/> Notice, ballots or materials not received on time <input type="checkbox"/> Missed deadline <input type="checkbox"/> Geographical restrictions (non-home market) <input type="checkbox"/> Cost <input type="checkbox"/> Conflicts of interest <input type="checkbox"/> Holdings deemed too small <input checked="" type="checkbox"/> Administrative impediments (e.g., power of attorney requirements, ineligibility due to participation in share placement) <input type="checkbox"/> Client request <input type="checkbox"/> Other (explain)	

LEA 17.3	Additional information. [Optional]
We define our mandate of possible AGMs as meetings we regard to be aligned with our policy.	

LEA 18	Voluntary	Additional Assessed	PRI 2
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LEA 18.1	Indicate whether you track the voting instructions that you or your service provider on your behalf have issued.								
<input checked="" type="radio"/> Yes, we track this information									
LEA 18.2	Of the voting instructions that you and/or third parties on your behalf have issued, indicate the proportion of ballot items that were:								
<table border="1"> <tr> <td>Voting instructions</td> <td>Breakdown as percentage of votes cast</td> </tr> <tr> <td>For (supporting) management recommendations</td> <td>75%</td> </tr> <tr> <td>Against (opposing) management recommendations</td> <td>20%</td> </tr> <tr> <td>Abstentions</td> <td>5%</td> </tr> </table>		Voting instructions	Breakdown as percentage of votes cast	For (supporting) management recommendations	75%	Against (opposing) management recommendations	20%	Abstentions	5%
Voting instructions	Breakdown as percentage of votes cast								
For (supporting) management recommendations	75%								
Against (opposing) management recommendations	20%								
Abstentions	5%								
<input type="radio"/> No, we do not track this information									

LEA 18.3	In cases where your organisation voted against management recommendations, indicate the percentage of companies which you have engaged.
25	

LEA 18.4	Additional information. [Optional]
Please note, the number is counted based on number of meetings and not number of ballot items.	

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

LEA 19.2	Indicate the escalation strategies used at your organisation following abstentions and/or votes against management.
<input checked="" type="checkbox"/> Contacting the company's board	

- Contacting the company's senior management
- Issuing a public statement explaining the rationale
- Initiating individual/collaborative engagement
- Directing service providers to engage
- Reducing exposure (holdings) / divestment
- Other

LEA 20	Voluntary	Descriptive	PRI 2
<i>Private</i>			
LEA 21	Voluntary	Descriptive	PRI 2
<i>Private</i>			
LEA Checks			Checks

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

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

FI 01.2	Describe your reasons for choosing a particular ESG incorporation strategy and how combinations of strategies are used.
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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, tobacco companies, global compact and positive impact. The thematic approach involves for e.g CO2 intensity and positive impact within the credit portfolio. We also exclude companies deriving 25% or more revenue from the mining of thermal coal or from the thermal coal based power generation.

FI 14	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 2
<i>Private</i>			
FI 15	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1,2
<i>Private</i>			
FI 16	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1,2
<i>Private</i>			
FI 17	Mandatory to Report, Voluntary to Disclose	Additional Assessed	General
<i>Private</i>			
FI 18	Voluntary	Descriptive	PRI 1,2
<i>Private</i>			

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="radio"/> Yes			
PR 01.2	Provide a URL or attach the document		
<input checked="" type="checkbox"/> URL https://www.elo.fi/tietoa-elosta/sijoitukset/elon-vastuullisuus-sijoitustoiminnassa			
<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. [Optional]		
<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="radio"/> 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			
		Environmental example 1, description	
Energy efficiency issues are part of technical DD done in every investment process.			
Contamination			
		Environmental example 2, description	
part of TDD-process			
Indoor environmental quality			
		Environmental example 3, description	
part of TDD-process			
<input checked="" type="checkbox"/> Social			
Accessibility			
Health, Safety and wellbeing			
Occupier Satisfaction			
<input checked="" type="checkbox"/> Governance			
Shareholder structure & rights			
		Governance example 1, description	
Assessed in legal DD			
Conflicts of interest			
		Governance example 2, description	
Assessed in legal DD			
Supply chain governance			

		Governance example 3, description																	
		Assessed in legal DD																	
		<input type="radio"/> No																	
PR 05	Voluntary	Additional Assessed	PRI 1,3																
	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 <input checked="" type="checkbox"/> ESG issues impacted the investment in terms of price offered and/or paid <input checked="" type="checkbox"/> ESG issues impacted the terms in the shareholder/purchase agreements and/or lending covenants <input type="checkbox"/> ESG issues were considered but did not have an impact on the investment selection process <input type="checkbox"/> Other, specify <input type="checkbox"/> Not applicable, our organisation did not select any investments in the reporting year <input type="checkbox"/> 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.																		
	<input checked="" type="checkbox"/> ESG issues impacted the investment in terms of price offered and/or paid <input checked="" type="checkbox"/> ESG issues impacted the terms in the shareholder/purchase agreements and/or lending covenants <input type="checkbox"/> ESG issues were considered but did not have an impact on the deal structuring process <input type="checkbox"/> Other, specify <input type="checkbox"/> Not applicable, our organisation did not select any investments in the reporting year <input type="checkbox"/> 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.																		
	<input checked="" type="checkbox"/> Yes																		
PR 07.2	Indicate how your organisation includes ESG issues in your selection, appointment and/or monitoring of third party property managers.																		
	<input checked="" type="checkbox"/> Selection process of property managers incorporated ESG issues <table border="1" data-bbox="347 1200 1401 1420"> <tr> <td></td> <td>Types of actions</td> </tr> <tr> <td></td> <td> <input checked="" type="checkbox"/> Request explanation of how ESG is effectively integrated, including inquiries about governance and processes <input checked="" type="checkbox"/> Request track records and examples of how the manager implements ESG in their asset and property management <input checked="" type="checkbox"/> Discuss property level out-performance opportunities through greater integration of ESG criteria <input checked="" type="checkbox"/> Request explanation of engaging stakeholders on ESG issues <input type="checkbox"/> Other, explain </td> </tr> </table> <table border="1" data-bbox="347 1424 1401 1570"> <tr> <td></td> <td>Coverage</td> </tr> <tr> <td></td> <td> <input checked="" type="radio"/> >75% to 100% <input type="radio"/> >50% to 75% <input type="radio"/> <50% </td> </tr> </table> <input checked="" type="checkbox"/> Contractual requirements when appointing property managers includes ESG issues <table border="1" data-bbox="347 1628 1401 1848"> <tr> <td></td> <td>Types of actions</td> </tr> <tr> <td></td> <td> <input checked="" type="checkbox"/> Include clear and detailed expectations for incorporating ESG <input type="checkbox"/> Require dedicated ESG procedures in all relevant asset and property management phases <input checked="" type="checkbox"/> Clear ESG reporting requirements <input checked="" type="checkbox"/> Clear ESG performance targets <input type="checkbox"/> Other, explain </td> </tr> </table> <table border="1" data-bbox="347 1852 1401 1998"> <tr> <td></td> <td>Coverage</td> </tr> <tr> <td></td> <td> <input checked="" type="radio"/> >75% to 100% <input type="radio"/> >50% to 75% <input type="radio"/> <50% </td> </tr> </table> <input checked="" type="checkbox"/> Monitoring of property managers covers ESG responsibilities and implementation				Types of actions		<input checked="" type="checkbox"/> Request explanation of how ESG is effectively integrated, including inquiries about governance and processes <input checked="" type="checkbox"/> Request track records and examples of how the manager implements ESG in their asset and property management <input checked="" type="checkbox"/> Discuss property level out-performance opportunities through greater integration of ESG criteria <input checked="" type="checkbox"/> Request explanation of engaging stakeholders on ESG issues <input type="checkbox"/> Other, explain		Coverage		<input checked="" type="radio"/> >75% to 100% <input type="radio"/> >50% to 75% <input type="radio"/> <50%		Types of actions		<input checked="" type="checkbox"/> Include clear and detailed expectations for incorporating ESG <input type="checkbox"/> Require dedicated ESG procedures in all relevant asset and property management phases <input checked="" type="checkbox"/> Clear ESG reporting requirements <input checked="" type="checkbox"/> Clear ESG performance targets <input type="checkbox"/> Other, explain		Coverage		<input checked="" type="radio"/> >75% to 100% <input type="radio"/> >50% to 75% <input type="radio"/> <50%
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	Coverage																		
	<input checked="" type="radio"/> >75% to 100% <input type="radio"/> >50% to 75% <input type="radio"/> <50%																		

	Types of actions
<input checked="" type="checkbox"/>	Performance against quantitative and material environmental / resource targets over specified timeframe.
<input checked="" type="checkbox"/>	Performance against quantitative and material environmental / resource targets against relevant benchmarks
<input type="checkbox"/>	Performance against quantitative and qualitative targets to address social impacts of the portfolio/investment,
<input type="checkbox"/>	Other, explain
	Coverage
<input checked="" type="radio"/>	>75% to 100%
<input type="radio"/>	>50% to 75%
<input type="radio"/>	<50%
<input type="radio"/>	No

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

PR 08	Mandatory	Gateway	PRI 2
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PR 08.1	Indicate if your organisation, and/or property managers, considers ESG issues in post-investment activities relating to your property assets.
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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.
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- 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.
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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. 2019 we changed to carbon neutral electricity in our directly owned buildings.

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
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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.
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- >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
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Environmental

Target/KPI	Progress Achieved

Energy and electricity consumption	Extension of properties monitored, commitment to national energy efficiency agreement. Monitoring system development and green electricity 2019.
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 Renewal of waste management agreements in office buildings.

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
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Private

PR 11	Mandatory	Core Assessed	PRI 2
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PR 11.1 Indicate the proportion of active property developments and major renovations where ESG issues have been considered.

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

PR 11.2 Indicate if the following ESG considerations are typically implemented and monitored in your property developments and major renovations.

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

PR 12	Mandatory	Core Assessed	PRI 2
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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.

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

- Distribute a sustainability guide to occupiers

- Organise occupier events focused on increasing sustainability awareness
- Deliver training on energy and water efficiency
- Deliver training on waste minimisation
- Provide feedback on energy and water consumption and/or waste generation
- Provide feedback on waste generation
- Carry out occupier satisfaction surveys
- Health and wellbeing of residents
- Offer green leases
- 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 some 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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Private

PR 15	Voluntary	Additional Assessed	PRI 1,2
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Private

PR 16	Voluntary	Descriptive	PRI 1,3
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Private

INF 01	Voluntary	Descriptive	PRI 1-6
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.elo.fi/-/media/files/yhtioasiat/elos-principles-of-responsible-investing2019.ashx			
<input type="checkbox"/> No			
INF 02.3	Additional information. [Optional]		
Infrastructure investments are a part of the general responsible investments policy.			
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 and questionnaire are part of the DD-process.			
<input type="checkbox"/> No			
INF 06	Voluntary	Descriptive	PRI 1,4
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			
<ul style="list-style-type: none"> Mitigation of climate change Carbon capture and storing Renewable energy production 			
<input checked="" type="checkbox"/> Social			
<ul style="list-style-type: none"> Health and Safety issues The rights of indigenous people Housing for special groups. 			
<input checked="" type="checkbox"/> Governance			
<ul style="list-style-type: none"> Anti corruption and bribery rules. Working for gender equality in business. Anti Money Laundering questionnaires in the DD-process. 			
INF 08	Voluntary	Additional Assessed	PRI 1,3
Private			
INF 09	Voluntary	Additional Assessed	PRI 1
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="checkbox"/> For all third-party operators			
<input checked="" type="checkbox"/> For a majority of third-party operators			
<input type="checkbox"/> For a minority of third-party operators			
<input type="checkbox"/> Contractual requirements when appointing third-party operators includes ESG issues			
<input type="checkbox"/> Monitoring of third-party operators covers ESG responsibilities and implementation			
<input type="checkbox"/> No			

INF 11	Mandatory	Gateway	PRI 2
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 <input type="checkbox"/> No		
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		
	<input type="checkbox"/> No		
INF 12	Mandatory	Core Assessed	PRI 2
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 type="checkbox"/> >90% of infrastructure assets <input checked="" type="checkbox"/> 51-90% of infrastructure assets <input type="checkbox"/> 10-50% of infrastructure assets <input type="checkbox"/> <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 type="checkbox"/> Environmental <input type="checkbox"/> Social <input type="checkbox"/> Governance <input checked="" type="checkbox"/> We do not set and/or monitor against targets		
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 <input type="checkbox"/> No		
INF 13.2	Indicate the proportion of your infrastructure investees that have an ESG/sustainability-related policy (or similar guidelines).		
	<input type="checkbox"/> >90% of infrastructure investees <input checked="" 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
	Private		
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 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 checked="" type="checkbox"/> N/A, no maintenance projects of infrastructure assets are active		
INF 16	Voluntary	Additional Assessed	PRI 2
	Private		
INF 17	Voluntary	Additional Assessed	PRI 1,2
	Private		
INF 18	Voluntary	Descriptive	PRI 1-3
	Private		

CM1 01	Mandatory	Additional Assessed	General																														
CM1 01.1	Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:																																
<input type="checkbox"/> Third party assurance over selected responses from this year's PRI Transparency Report <input type="checkbox"/> Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year <input type="checkbox"/> Third party assurance or audit of the correct implementation of RI processes (that have been reported to the PRI this year) <input type="checkbox"/> Internal audit of the correct implementation of RI processes and/or accuracy of RI data (that have been reported to the PRI this year) <input checked="" type="checkbox"/> Internal verification of responses before submission to the PRI (e.g. by the CEO or the board) <ul style="list-style-type: none"> <input type="radio"/> Whole PRI Transparency Report has been internally verified <input checked="" type="checkbox"/> Selected data has been internally verified <input checked="" type="checkbox"/> Other, specify Compliance officer and Head of Equities have approved this <input type="checkbox"/> None of the above																																	
CM1 02	Mandatory	Descriptive	General																														
CM1 02.1	We undertook third party assurance on last year's PRI Transparency Report																																
<input type="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 <input type="radio"/> None of the above, we were in our preparation year and did not report last year.																																	
CM1 03	Mandatory	Descriptive	General																														
CM1 03.1	We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:																																
<input type="checkbox"/> We adhere to an RI certification or labelling scheme <input type="checkbox"/> We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report <input type="checkbox"/> ESG audit of holdings <input type="checkbox"/> Other, specify <input checked="" type="checkbox"/> None of the above																																	
CM1 04	Mandatory	Descriptive	General																														
CM1 04.1	Do you plan to conduct third party assurance of this year's PRI Transparency report?																																
<input type="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 07	Mandatory	Descriptive	General																														
CM1 07.1	Indicate who has reviewed/verified internally the whole - or selected data of the - PRI Transparency Report . and if this applies to selected data please specify what data was reviewed																																
<input checked="" type="checkbox"/> CEO or other Chief-Level staff <table border="1" style="width: 100%; margin-top: 10px;"> <tr> <td style="width: 20%;"></td> <td>Sign-off or review of responses</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Sign-off</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Review of responses</td> </tr> <tr> <td colspan="2">What data has been verified</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Policies</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Overarching strategy and processes</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Asset class specific processes</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Quantitative data related to RI processes</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Other</td> </tr> <tr> <td colspan="2">Relevant modules</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Organisational Overview</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Strategy and Governance</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Indirect – Manager Selection, Appointment and Monitoring</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Direct - Listed Equity Incorporation</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Direct - Listed Equity Active Ownership</td> </tr> </table>					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	<input checked="" type="checkbox"/>	Strategy and Governance	<input type="checkbox"/>	Indirect – Manager Selection, Appointment and Monitoring	<input type="checkbox"/>	Direct - Listed Equity Incorporation	<input type="checkbox"/>	Direct - Listed Equity Active Ownership
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- Direct - Fixed Income
- Direct - Property
- Direct - Infrastructure
- 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
- Strategy and Governance
- Indirect – Manager Selection, Appointment and Monitoring
- Direct - Listed Equity Incorporation
- Direct - Listed Equity Active Ownership
- Direct - Fixed Income
- Direct - Property
- Direct - Infrastructure

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

- Investment Teams
- Legal Department
- Other (specify)

specify

Head of Equity

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
- Strategy and Governance
- Indirect – Manager Selection, Appointment and Monitoring
- Direct - Listed Equity Incorporation



- Direct - Listed Equity Active Ownership
- Direct - Fixed Income
- Direct - Property
- Direct - Infrastructure