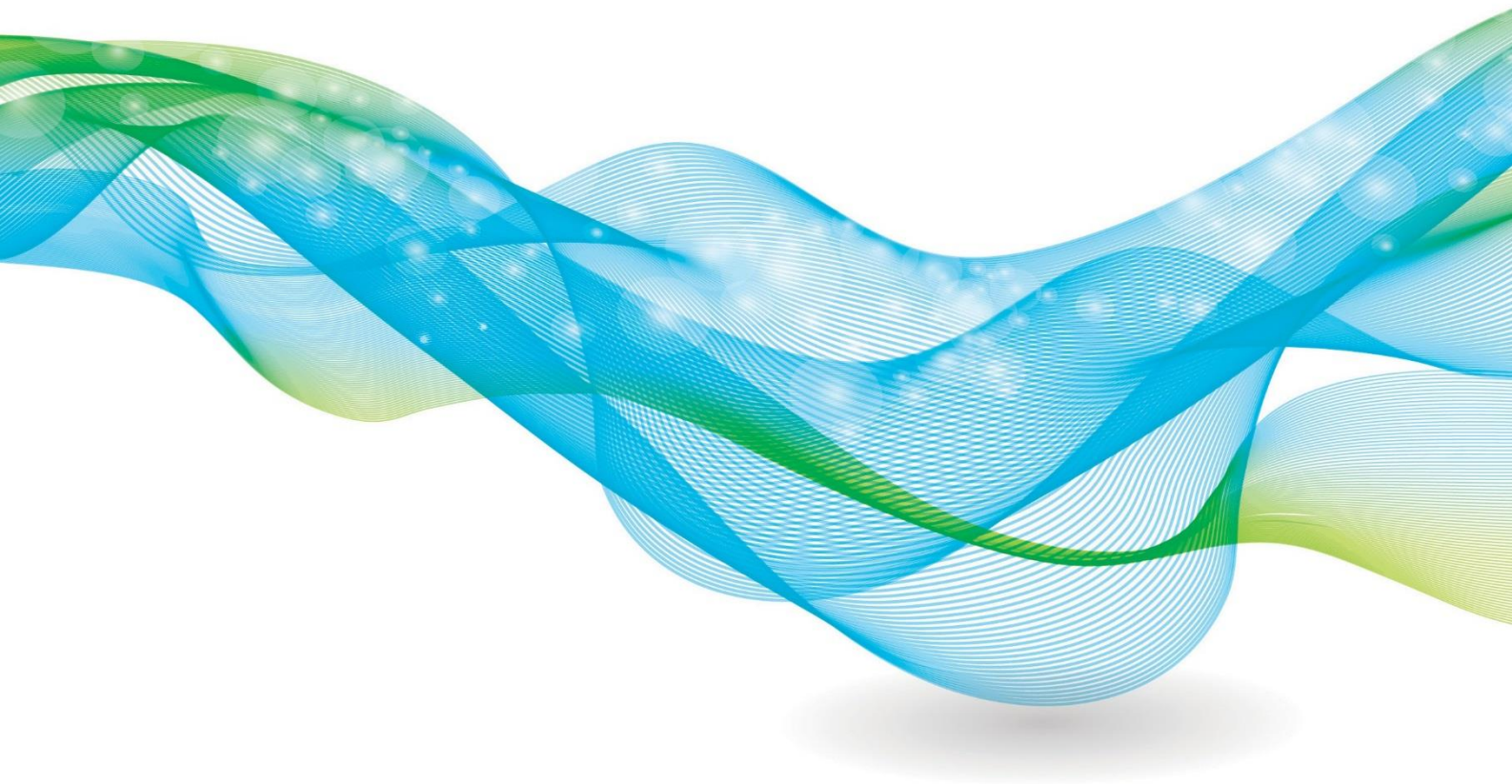
PRI Principles for Responsible Investment



PRI REPORTING FRAMEWORK 2020
Direct — Listed Equity Active Ownership

November 2019

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UNEP Finance Initiative
Changing finance, financing change

United Nations Global Compact

An investor initiative in partnership with UNEP Finance Initiative and UN Global Compact

Understanding this document

In addition to the detailed indicator text and selection options, in each module of the PRI Reporting Framework you can find information that will help you identify which indicators are relevant to your organisation.

Top bar

Key information about each indicator is highlighted in the top bar, including the indicator status (mandatory or voluntary), the purpose of the indicator and which PRI Principle it relates to.

	Indicator status	Purpose	Principle
xxx 01	*MANDATORY*	*CORE ASSESSED*	*PRI 2*

Indicator status

MANDATORY	Mandatory indicators reflect core practices. These responses will be made public and must be completed to submit the framework.
MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	Some indicators are mandatory to complete, but voluntary to disclose. These indicators may determine which subsequent indicators are applicable or are used for peering, but they may also contain commercially sensitive information.
VOLUNTARY	Voluntary indicators concern alternative or advanced practices. These indicators are voluntary to report and disclose.

Purpose

Gateway	The responses to this indicator 'unlock' other indicators within a module if they are relevant to your organisation. Please refer to the logic box for more information.
Peering	These indicators are used to determine your peer groups for assessment purposes.
Core assessed	These indicators form the core of the assessment and represent the majority of your final assessment score.
Additional assessed	These indicators represent more advanced or alternative practices and contribute to a smaller part of your score.
Descriptive	These are open-ended narrative indicators, allowing you to describe your activities.

Underneath the indicator

Underneath the indicator, you can find explanatory notes and definitions which include important information on interpreting and completing the indicators. Read the logic box to make sure an indicator is applicable to you.

xxx 01	**EXPLANATORY NOTES**
xxx 01.1	This provides guidance about how to interpret the sub-indicators, including examples of what can be reported.
xxx 01.2	
LOGIC	
xxx 01	This explains when this indicator is applicable and/or if it has an impact on subsequent indicators. If there is no logic box, the indicator is always applicable and does not affect other indicators.
ASSESSMENT	
xxx 01	This provides a brief overview of the pilot assessment approach for this indicator.

xxx 01	**DEFINITIONS**
xxx 01	Specific terms that are used in the indicator are defined here.

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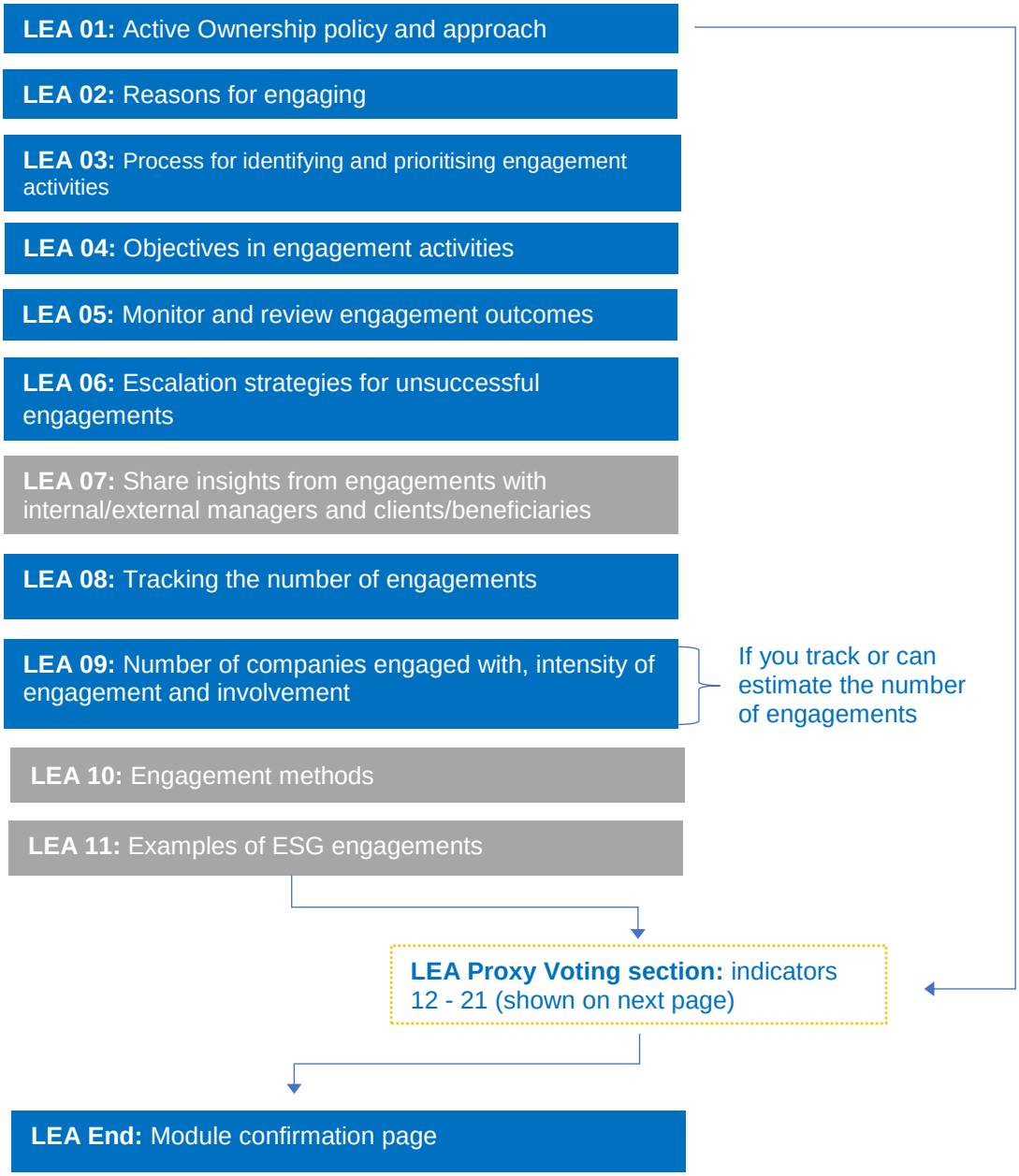
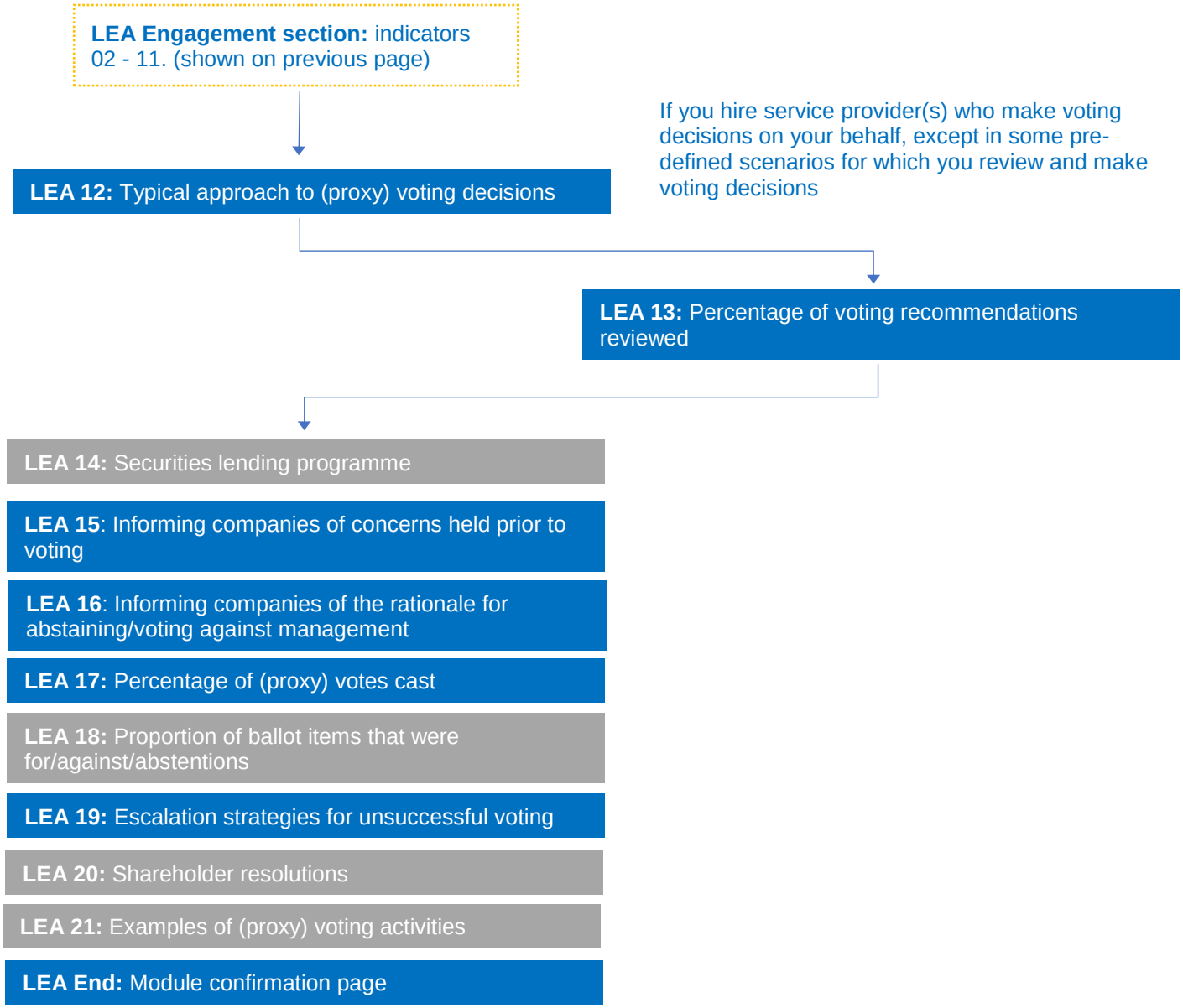
Pathways through the module




LEA Engagement section: indicators 02 - 11. (shown on previous page)
If you hire service provider(s) who make voting decisions on your behalf, except in some pre-defined scenarios for which you review and make voting decisions
LEA 12: Typical approach to (proxy) voting decisions
LEA 13: Percentage of voting recommendations reviewed
LEA 14: Securities lending programme
LEA 15: Informing companies of concerns held prior to voting
LEA 16: Informing companies of the rationale for abstaining/voting against management
LEA 17: Percentage of (proxy) votes cast
LEA 18: Proportion of ballot items that were for/against/abstentions
LEA 19: Escalation strategies for unsuccessful voting
LEA 20: Shareholder resolutions
LEA 21: Examples of (proxy) voting activities
LEA End: Module confirmation page

Preface

The information reported in this module will enable your stakeholders to understand how your organisation carries out the following activities in relation to listed equities: (a) your own engagement activities (e.g., engagement conducted by internal staff, both collaboratively and individually) or any engagement activities undertaken on your behalf by service providers; and (b) (proxy) voting and shareholder resolutions decided upon by you or on your behalf by service providers.

This module does not cover engagement and/or (proxy) voting activities carried out on your behalf by external investment managers. These activities are covered in the module on external managers entitled *Indirect — Manager Selection, Appointment and Monitoring (SAM).*

Note: This module has two different sections.

Summary of updates

Indicator	Update summary
LEA 16.1	Indicator wording clarified.

To view a detailed summary of the changes to the module, please click here.

OVERVIEW

LEA 01	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 2

LEA 01	INDICATOR	
LEA 01.1	Indicate whether your organisation has an active ownership policy (includes engagement and/or voting).	
	❍ Yes	❍ No
LEA 01.2	Attach or provide a URL to your active ownership policy.	
LEA 01.3	Indicate what your active engagement policy covers:	
	General approach to Active Ownership	❒ Conflicts of interest ❒ Alignment with national stewardship code requirements ❒ Assets/funds covered by active ownership policy ❒ Expectations and objectives ❒ Engagement approach ❒ (Proxy) voting approach ❒ Other; (specify) _____ ❒ None of the above
	Engagement	❒ ESG issues ❒ Prioritisation of engagement ❒ Methods of engagement ❒ Transparency of engagement activities ❒ Due diligence and monitoring process ❒ Insider information ❒ Escalation strategies ❒ Service Provider specific criteria ❒ Other; (specify) _____
	Voting	❒ ESG issues ❒ Prioritisation and scope of voting activities ❒ Methods of voting ❒ Transparency of voting activities ❒ Regional voting practice approaches

		❒ Filing or co-filing resolutions ❒ Company dialogue pre/post-vote ❒ Decision-making processes ❒ Securities lending processes ❒ Other; (specify) _____
LEA 01.4	Do you outsource any of your active ownership activities to service providers?	
	❑ ❍ Yes	❑ ❍ No
LEA 01.5	Where active ownership activities are conducted by service providers, indicate whether your active ownership policy covers any of the following:	
	❑ Outline of service provider's role in implementing your organisation's active ownership policy ❑ Description of considerations included in service provider selection and agreements ❑ Identification of key ESG frameworks which service providers must follow ❑ Outline of information- sharing requirements of service providers ❑ Description of service provider monitoring processes ❑ Other; (specify) _____ ❑ None of the above	
LEA 01.6	Additional Information. [OPTIONAL]	

LEA 01	**EXPLANATORY NOTES**
LEA 01	This indicator is aligned with the ICGN Global Stewardship Principles. The indicator [LEA 01.2] is aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations.
LEA 01.1	The policy can be a component of or separate to your overall responsible investment policy. Investors may define their organisation's active ownership policy directly in their investment policy. By doing so, they can signal that active ownership is not a standalone practice but a means to improve decision making and execute investment objectives.
LEA 01.5	Where an investor decides to outsource active ownership activities to specialised service providers, the active ownership policy can contain less detail, but it is still important to outline the value of engagement and voting for the organisation, and to guide the relationship with these selected third parties. For more information about the options identified, refer to the PRI's 'A Practical Guide to Active Ownership in Listed Equity'.
LEA 01.6	This may include a discussion of: • how often your engagement policy is reviewed, and the level of internal endorsement within your organisation's governance structure for responsible investment (e.g., board, trustees, etc.); • your organisation's objectives in undertaking engagement activities, including whether these activities are informed by and support investment decision making;

	• your organisation's approach to avoiding, identifying and managing conflicts of interest, including the process to communicate possible conflicts of interest, and remedies to mitigate them, to clients or beneficiaries; • your organisation's procedures for monitoring ESG practices and performance by investee companies to identify cases for engagement; • whether engagement is conducted only with companies that are held in your portfolios, or also with companies that are not; • whether your engagements are primarily proactive to ensure that ESG issues are well managed in a preventive manner, or reactive to address issues that may have already occurred; • who carries out the engagement (e.g., specialised in-house ESG teams, portfolio managers, or both, etc.), and how you ensure your organisation has the appropriate capacity and experience for engagement activities (e.g., human resources, time and training); • whom you seek to engage with within companies (e.g., board representatives, chairman, CEO, CSR/IR managers); • whether your organisation typically engages with companies on specific ESG issues (e.g., emissions, climate change or other specific ESG issues); • your organisation's approach in case of unsuccessful engagement (e.g., public statement, overweight/underweight, filing resolutions, divestment, litigation); • your organisation's tracking of engagement meetings and interactions, and its commitment to transparency towards clients/beneficiaries and the public.
LOGIC	
LEA 01	[LEA 01 – LEA 02] are applicable if in [OO 10.1] you select "We engage with companies on ESG issues via our staff, collaborations or service providers." [LEA 01] will be applicable if in [OO 10.1] you select "We cast our (proxy) votes directly or via dedicated voting providers." [LEA 01.2] and [LEA 01.3] will be applicable if you report "Yes" in [LEA 01.1]. [LEA 01.5] will be applicable if you report "Yes" in [LEA 01.4].
ASSESSMENT	

Engagement

Maximum score: Three ★

The assessment of this indicator is based on your responses to [01.1] and [01.3] and contributes attributed to the assessment of the Engagement section.

Indicator scoring methodology

Selected response	Level score	Further details
"No" in LEA 01.1 or "Yes" in LEA 01.1, and one option selected in the Engagement section of LEA 01.3.	○	
"Yes" in LEA 01.1 and two options selected in the Engagement section of LEA 01.3.	★	"Other" will not count as a selection.
"Yes" in LEA 01.1 and three options selected in the Engagement section of LEA 01.3.	★★	"Other" will not count as a selection.
"Yes" in LEA 01.1 and four options selected in the Engagement section of LEA 01.3.	★★★	"Other" will not count as a selection.

	Voting		
	Maximum score: Three ★ The assessment of this indicator is based on your responses to [01.1] and [01.3] and contributes to the assessment of the Voting section.		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further details**
	“No” in LEA 01.1 or “Yes” in LEA 01.1, and one option selected in the Voting section of LEA 01.3.	⭘	
	“Yes” in LEA 01.1 and two options selected in the Voting section of LEA 01.3.	★	“Other” will not count as a selection.
	“Yes” in LEA 01.1 and three options selected in the Voting section of LEA 01.3.	★★	“Other” will not count as a selection.
	“Yes” in LEA 01.1 and four options selected in the Voting section of LEA 01.3.	★★★	“Other” will not count as a selection.

SECTION

Engagement

LEA 02	Indicator status MANDATORY	Purpose CORE	Principle PRI 1, 2, 3

LEA 02	INDICATOR	
LEA 02.1	Indicate the method of engagement, giving reasons for the interaction.	
	Type of engagement	**Reason for interaction**
	Individual / Internal staff engagements	❒ To influence corporate practice (or identify the need to influence it) on ESG issues ❒ To encourage improved/increased ESG disclosure ❒ To gain an understanding of ESG strategy and/or management ❒ We do not engage via internal staff
	Collaborative engagements	❒ To influence corporate practice (or identify the need to influence it) on ESG issues ❒ To encourage improved/increased ESG disclosure ❒ To gain an understanding of ESG strategy and/or management ❒ We do not engage via collaborative engagements
	Service provider engagements	❒ To influence corporate practice (or identify the need to influence it) on ESG issues ❒ To encourage improved/increased ESG disclosure ❒ To gain an understanding of ESG strategy and/or management ❒ We do not engage via service providers
LEA 02.2	Indicate whether your organisation plays a role in the engagement process that your service provider conducts.	
	❍ Yes	❍ No
LEA 02.3	Indicate the role(s) you play in engagements that your service provider conducts on your behalf. ❒ We discuss the topic of the engagement (or ESG issue(s)) of engagement ❒ We discuss the rationale for the engagement ❒ We discuss the objectives of the engagement ❒ We select the companies to be engaged with ❒ We discuss the frequency/intensity of interactions with companies	

	❒ We discuss the next steps for engagement activity ❒ We participate directly in certain engagements with our service provider ❒ Other; (specify) _____ ❍ We play no role in engagements that our service provider conducts.
LEA 02.4	Additional information. [OPTIONAL]

LEA 02	**EXPLANATORY NOTES**
LEA 02	The indicators [LEA 02.1] and [LEA 2.3] are aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations, and [LEA 02.1] and [LEA 02.2] are ICGN Global Stewardship Principles.
LEA 02.1	Option "**To influence corporate practice** (or identify the need to influence it) **on ESG issues."** Option "**To encourage improved/increased ESG disclosure."** These are engagements that seek better ESG-related disclosure and transparency. These interactions relate to Principle 2 and Principle 3. Option "**To gain an understanding of ESG strategy and/or management."** This can be selected when engagement occurs with the direct or indirect intention of gaining a better understanding/knowledge of ESG issues in order to assist in investment decision making. Principle 5 of the PRI, together with several voluntary codes and guidelines (including existing national stewardship codes, the ICGN stewardship principles and the OECD paper of Responsible Business Conduct for Institutional Investors), encourages investors to collaborate with peers to engage with investee companies. Collaborative engagements allow individual investors to share information, time and resources, while communicating with portfolio companies in a unified voice on areas of common concern.
LEA 02.2	This indicator refers to engagement in relation to your organisation's internally and externally managed assets that is conducted by service providers. Any engagements carried out by your external investment managers are covered in the *Indirect Manager Selection, Appointment and Monitoring (SAM)* module.
LEA 02.4	Your response may include a discussion of: • why your organisation does not engage via individual, collective and/or service providers; • your role in setting engagement/active ownership objectives with your service providers; • how you monitor/oversee service provider activities; • any joint engagement conducted with the service provider (e.g. participating in company meetings)
LOGIC	
LEA 02	Your responses here are gateways for further sections in this module. Selecting the following options in [LEA 02.1] will trigger the following indicators: • selecting Individual/ Internal staff engagement will trigger the Individual/Internal staff engagement options in [LEA 4 – 6]; • selecting Collaborative engagement will trigger the collaborative engagement options in [LEA 4 – 6];

<table>
<tr><td></td><td colspan="3">

- selecting Service Provider engagement will trigger the service provider engagement options in [LEA 4 – 6].]

In addition, if engagements that are reported for the reasons given above are conducted by internal staff, service providers and/or collaboratively, indicators [LEA 08 - 11] will be applicable.

[LEA 02.2] is applicable if your organisation engages via service providers in [LEA 02.1].

[LEA 02.3] is applicable if “Yes” is selected in [LEA 02.2].

</td></tr>
<tr><td colspan="4">ASSESSMENT</td></tr>
<tr><td rowspan="8">LEA 02</td><td colspan="3">Your aggregate LEA score will be based on your ‘primary’ method of engagement (directly by internal staff, in collaboration with other investors, or through commercial service providers). Whether your method is ‘primary’ or not will be determined by your responses to LEA 09.1–09.3, the number of engagements combined with how comprehensive they were, and the level of your involvement. All reported assessed indicators will be included in your module scorecard. The PRI does not suggest or prefer a particular engagement method. Signatories can score the top grade by using any one or a combination of engagement methods.

Maximum score: Three ★

The assessment of this indicator is based on your responses to [02.2] and [02.3].</td></tr>
<tr><td colspan="3">Indicator scoring methodology</td></tr>
<tr><td>Selected response</td><td>Level score</td><td>Further Details</td></tr>
<tr><td>No engagements conducted by service providers in [02.1].</td><td>N/A</td><td></td></tr>
<tr><td>“No”</td><td>⭘</td><td></td></tr>
<tr><td>“Yes” in [02.2], one option selected in [02.3].</td><td>★</td><td>“Other” will not count as a selection.</td></tr>
<tr><td>“Yes” in [02.2], 2–3 options selected in [02.3].</td><td>★★</td><td>“Other” will not count as a selection.</td></tr>
<tr><td>“Yes” in [02.2], >3 options selected in [02.3].</td><td>★★★</td><td>“Other” will not count as a selection.</td></tr>
</table>

LEA 02	**DEFINITIONS**
Engagement categories based on who conducts them	
There are many different categories of engagement. Investors engage with companies directly in their own name, in collaboration with other investors (independently or through investor networks/membership organisations), and through commercial service providers. The distinctions between the various types of engagement are not always clear-cut. Please use the definitions below and your best professional judgement when deciding how to classify your organisation's engagements. Review the process indicators for each category, and determine which indicator(s) best fit your organisation's business model. Please contact the Reporting and Assessment team if you require additional clarification.	
Individual/Internal staff engagement	The defining characteristics of an individual/internal staff engagement are that: • it is carried out by your internal staff only, with no involvement or support from other investors, investor networks or service providers; and • it is conducted in the name of your organisation (i.e., the companies with which you engage can identify your organisation individually), and you do not act on behalf of other organisations. Being a signatory to CDP should not be counted as an engagement, but rather reported as part of the way you support responsible investment in Strategy & Governance SG08. However, if your organisation engages in its own name with companies on their carbon emissions, water or forest footprint disclosures as a follow-up to CDP disclosure requests and/or as part of CDP's Carbon Action or Aiming for A initiatives, you should report these engagements as individual/internal staff engagements.
Collaborative engagement	Collaborative engagement is an engagement that an investor conducts jointly with other investors. This includes: • groups of investors working together without the involvement of a formal investor network or other membership organisation(s); • groups of investors working together within a formal investor network or other membership organisation, with some level of support, but with individual members of the collaboration having responsibility for most of the engagement activity; and • collaborative engagement coordinated and facilitated by a formal investor network (e.g., PRI-coordinated investors' coalitions). Being a signatory to CDP should not be counted as an engagement, but rather reported as part of the way you support responsible investment in Strategy & Governance SG08. However, if your organisation collaborates with a group of investors to engage with companies on their carbon emissions, water or forest footprint disclosures as a follow-up to CDP disclosure requests, you should report these engagements as collaborative engagements.
Service-provider engagement	Service-provider engagements include engagements conducted via: • commercial parties that provide stand-alone engagement services without managing their clients' underlying assets; and • investor organisations that conduct engagement on their members' behalf and have an explicit mandate from their members to represent them. These include engagements conducted entirely on an outsourced basis, as well as those facilitated by the service provider with some involvement of the investor's own staff.

LEA 03	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 2

LEA 03	INDICATOR	
LEA 03.1	Indicate whether your organisation has a formal process for identifying and prioritising engagements.	
	❍ Yes	❍ No
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	❑ Geography/market of the companies ❑ Materiality of the ESG factors ❑ Exposure (size of holdings) ❑ Responses to ESG impacts that have already occurred ❑ Responses to divestment pressure ❑ Consultation with clients/beneficiaries ❑ Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) ❑ Follow-up from a voting decision ❑ Client request ❑ Breaches of international norms ❑ Other; (specify) _____ ❍ We do not outline engagement criteria for our individual engagements
	Collaborative engagements	❑ Potential to enhance knowledge of ESG issues through other investors ❑ Ability to have greater impact on ESG issues ❑ Ability to add value to the collaboration ❑ Geography/market of the companies targeted by the collaboration ❑ Materiality of the ESG factors addressed by the collaboration ❑ Exposure (size of holdings) to companies targeted by the collaboration ❑ Responses to ESG impacts addressed by the collaboration that have already occurred ❑ Responses to divestment pressure ❑ Follow-up from a voting decision ❑ Alleviate the resource burden of engagement ❑ Consultation with clients/beneficiaries ❑ Consultation with other stakeholders (e.g. NGOs, trade unions, etc.)

		❑ Other; (specify) _____ ❍ We do not outline engagement criteria for our collaborative engagement providers
	Service-provider engagements	❑ Geography/market of the companies ❑ Materiality of the ESG factors ❑ Exposure (size of holdings) ❑ Responses to ESG impacts that have already occurred ❑ Responses to divestment pressure ❑ Consultation with clients/beneficiaries ❑ Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) ❑ Follow-up from a voting decision ❑ Client request ❑ Breaches of international norms ❑ Other, (specify) _____ ❍ We do not outline engagement criteria for our service providers
LEA 03.3	Additional information. [OPTIONAL]	

LEA 03	**EXPLANATORY NOTES**		
LEA 03	The indicator [LEA 03.1] is aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations.		
LEA 03.1	This indicator allows you to outline the criteria used to identify and prioritise your organisation's engagement activities.		
LOGIC			
LEA 03	[LEA 03.1] is applicable if you have engagements conducted by internal staff, in collaboration with other investors, or through service providers in [LEA 02.1].		
ASSESSMENT			
LEA 03	Maximum score: Three ★ The assessment of this indicator is based on each engagement method section in [03.1] and [03.2].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	"No" in LEA 03.1.	⭘	
	"Yes" in 03.1 and one option in LEA 03.2.	★	"Other" will not count as a selection.
	"Yes" in 03.1 and two options in LEA 03.2.	★★	"Other" will not count as a selection.
	"Yes" in 03.1 and three or more options in LEA 03.2.	★★★	"Other" will not count as a selection.

LEA 04	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 2

LEA 04	INDICATOR	
LEA 04.1	Indicate whether you define specific objectives for your organisation's engagement activities.	
	Individual / Internal staff engagements	❒ All engagement activities ❒ Majority of engagement activities ❒ Minority of engagement activities ❍ We do not define specific objectives for engagement activities carried out by internal staff
	Collaborative engagements	❒ All engagement activities ❒ Majority of engagement activities ❒ Minority of engagement activities ❍ We do not define specific objectives for engagement activities carried out through collaboration
	Service-provider engagements	❒ All engagement activities ❒ Majority of engagement activities ❒ Minority of engagement activities ❍ We do not define specific objectives for engagement activities carried out by our service providers
LEA 04.2	Additional information. [OPTIONAL]	

LEA 04	EXPLANATORY NOTES
LEA 04	The indicator [LEA 04.1] is aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations.
LEA 04.2	This indicator allows you to outline the extent to which your organisation's engagement activities have clearly defined objectives.
LEA 04.3	Additional information on defining specific objectives can include: • whether/ how engagement objectives are defined; • your role in setting engagement objectives
LOGIC	
LEA 04	[LEA 04.1] is applicable if you have engagements conducted by internal staff, in collaboration with other investors, or through service providers in [LEA 02.1].

ASSESSMENT			
LEA 04	Maximum score: Three ★ The assessment of this indicator is based on your responses to [04.1].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	“We do not define specific objectives for engagement activities” in LEA 04.1	⭘	
	“Minority of engagement activities” in LEA 04.1	★	
	“Majority of engagement activities” in LEA 04.1	★★	
	“All engagement activities” in LEA 04.1	★★★	

LEA 05	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 2

LEA 05	INDICATOR	
LEA 05.1	Indicate whether you monitor and/or review engagement outcomes.	
	Individual / Internal staff engagements	❍ Yes, in all cases ❍ Yes, in a majority of cases ❍ Yes, in a minority of cases ❍ We do not monitor, or review engagement outcomes when the engagement is carried out by our internal staff.
	Collaborative engagements	❍ Yes, in all cases ❍ Yes, in a majority of cases ❍ Yes, in a minority of cases ❍ We do not monitor, or review engagement outcomes when the engagement is carried out through collaboration.
	Service-provider engagements	❍ Yes, in all cases ❍ Yes, in a majority of cases ❍ Yes, in a minority of cases ❍ We do not monitor, or review engagement outcomes when the engagement is carried out by our service providers.
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	❒ Define timelines/milestones for your objectives ❒ Track and/or monitor progress against defined objectives and/or KPIs ❒ Track and/or monitor the progress of action taken when original objectives are not met ❒ Revisit and, if necessary, revise objectives on a continuous basis ❒ Other; specify _____
	Collaborative engagements	❒ Define timelines/milestones for your objectives ❒ Track and/or monitor progress against defined objectives and/or KPIs ❒ Track and/or monitor the progress of action taken when original objectives are not met ❒ Revisit and, if necessary, revise objectives on a continuous basis ❒ Other; specify_____
	Service-provider engagements	❒ Define timelines/milestones for your objectives

		❒ Track and/or monitor progress against defined objectives and/or KPIs ❒ Track and/or monitor the progress of action taken when original objectives are not met ❒ Revisit and, if necessary, revise objectives on a continuous basis ❒ Other; specify_____
LEA 05.3	Additional information. [OPTIONAL]	

LEA 05	**EXPLANATORY NOTES**
LEA 05.3	You can include a discussion of: • whether/how the progress of engagements is tracked (e.g. milestones, intermediate targets); • how you monitor action taken by companies (e.g. through third- party research, internal research, or both); • how regularly the research/information is updated; • any auditing procedures to ensure information recorded is accurate.
LOGIC	
LEA 05	[LEA 05.1] is applicable if you have engagements conducted by internal staff, in collaboration with other investors, or through service providers in [02.1]. [LEA 05.2] is applicable if any "Yes" option was selected in [LEA 05.1].
ASSESSMENT	

LEA 05

Maximum score: Three ★

The assessment of this indicator is based on whether you monitor and/or review engagements in [05.1] and [05.2].

Indicator scoring methodology

Selected response	**Level score**	**Further Details**
"We do not monitor review engagement outcomes" in LEA 05.1.	○	
"Yes, in a majority of cases" in LEA 05.1 and one option in LEA 05.2, OR "Yes, but in a minority of cases" in LEA 05.1.	★	"Other" will not count as a selection.
"Yes, in all cases" in LEA 05.1 and one option in LEA 05.2, OR "Yes, in a majority of cases" in LEA 05.1 and two options in LEA 05.2.	★★	"Other" will not count as a selection.
"Yes, in all cases" in LEA 05.1 and at least two options in LEA 05.2, OR "Yes, in a majority of cases" in LEA 05.1 and at least 3 options in LEA 05.2.	★★★	"Other" will not count as a selection.

LEA 06	Indicator status MANDATORY	Purpose ADDITIONAL ASSESSED	Principle PRI 2,4

LEA 06	INDICATOR	
LEA 06.1	Indicate whether your organisation has an escalation strategy when engagements are unsuccessful.	
	❍ Yes	❍ No
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 _____	
LEA 06.3	Additional information. [OPTIONAL]	

LEA 06	EXPLANATORY NOTES		
LOGIC			
LEA 06	[LEA 06] is applicable if you have engagements conducted by internal staff, in collaboration with other investors, or through service providers in [02.1]. [LEA 06.2] is applicable if "Yes" is selected in [LEA 06.1].		
ASSESSMENT			
LEA 06	Maximum score: Three ★ The assessment of this indicator is based on your responses to [06.1] and [06.2].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	"No" in [06.1] or "Yes" in [06.1],] and no selection in [06.2].	○	
	"Yes" in [06.1] and one option or more in [06.2].	★★★	"Other" will not count as a selection.

LEA 07	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PRI 1,2

LEA 07	INDICATOR
LEA 07.1	Indicate whether insights gained from your organisation's engagements are shared with investment decision-makers. **Individual/Internal staff engagements** ❍ Yes, systematically ❍ Yes, occasionally ❍ No **Collaborative engagements** ❍ Yes, systematically ❍ Yes, occasionally ❍ No **Service-provider engagements** ❍ Yes, systematically ❍ Yes, occasionally ❍ 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 _____ ❍ None
LEA 07.3	Indicate whether insights gained from your organisation's engagements are shared with your clients/beneficiaries. **Individual/Internal staff engagements** ❍ Yes, systematically ❍ Yes, occasionally ❍ No **Collaborative engagements** ❍ Yes, systematically ❍ Yes, occasionally ❍ No **Service-provider engagements** ❍ Yes, systematically ❍ Yes, occasionally ❍ No
LEA 07.4	Additional information. [OPTIONAL]

<table>
<tr><th>LEA 07</th><th colspan="3">EXPLANATORY NOTES</th></tr>
<tr><td>LEA 07.1</td><td colspan="3">This indicator allows you to explain whether you have a formal process for sharing information derived from engagement with your internal or external investment decision makers (i.e., to link PRI Principle 1 and Principle 2).

This indicator mirrors indicator LEI 05. This aspect is addressed in both the LEI and LEA modules to highlight the link between Principles 1 and 2 and to reward this linkage from both the listed-equity incorporation and active ownership standpoints.

Report “Yes, systematically” if you have a formal system or process. This may, for example, consist of meetings or the recording of the results of an engagement on an IT system that is shared with investment staff.

Report “Yes, occasionally” if the information is shared in some cases, but not according to a formal process of this kind.

To find out more on how your peers have responded to this practice, view our listed equity active ownership interactive data report. These are all available on the Data Portal and the PRI website.</td></tr>
<tr><td>LEA 07.3</td><td colspan="3">This indicator allows you to explain whether you have a formal process for sharing information derived from engagement with your client and/or beneficiaries.

Report “Yes, systematically” if you have a formal system or process.

Report “Yes, occasionally” if the information is shared in some cases, but not according to a formal process of this kind.</td></tr>
<tr><td>LEA 07.4</td><td colspan="3">This can include a discussion of:
how you decide which information to pass on to investment decision makers;
what you expect investment decision makers to do with the insights you pass on; and/or
how you monitor their use of the insights you pass on;
whether ESG data collected through engagement feeds into an internal ratings tool/platform;
whether your organisation’s communication approach with external managers differs from that communication approach with internal decision -makers.</td></tr>
<tr><td colspan="4">LOGIC</td></tr>
<tr><td>LEA 07</td><td colspan="3">[LEA 07] is applicable if you have engagements conducted by internal staff, in collaboration with other investors, or through by service providers in [02.1].

[LEA 07.2] will be applicable if “Yes” is reported in [LEA 07.1].</td></tr>
<tr><td colspan="4">ASSESSMENT</td></tr>
<tr><td rowspan="5">LEA 07</td><td colspan="3">Maximum score: Three ★ per engagement implementation group.

The assessment of this indicator is based on your responses to [07.1] and [07.2].</td></tr>
<tr><td colspan="3">Indicator scoring methodology</td></tr>
<tr><td>Selected response</td><td>Level score</td><td>Further Details</td></tr>
<tr><td>“No”</td><td>⭘</td><td></td></tr>
<tr><td>“Yes” in [07.1] and one option in [07.2].</td><td>★</td><td></td></tr>
<tr><td>“Yes” in [07.1] and two options in [07.2].</td><td>★★</td><td></td></tr>
</table>

	"Yes" in [07.1] and three options in [07.2].	★★★	

LEA 08	Indicator status MANDATORY	Purpose GATEWAY	Principle PRI 2

LEA 08	INDICATOR	
LEA 08.1	Indicate whether you track the number of your engagement activities.	
	Type of engagement	**Tracking engagements**
	Individual/Internal staff engagements	❍ Yes, we track the number of engagements in full. ❍ Yes, we partially track the number of our engagements. ❍ We do not track.
	Collaborative engagements	❍ Yes, we track the number of collaborative engagements in full. ❍ Yes, we partially track the number of our collaborative engagements. ❍ We do not track.
	Service-provider engagements	❍ Yes, we track the number of service-provider engagements in full. ❍ Yes, we partially track the number of our service-provider engagements. ❍ We do not track.
LEA 08.2	Additional information. [OPTIONAL]	

LEA 08	EXPLANATORY NOTES
LEA 08	The indicator [LEA 08.1] is aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations.
LEA 08.1	This indicator allows you to report whether you track the number of engagements conducted by your organisation and/or its service providers. You may be tracking your engagements but doing so partially (e.g., when engagements carried out by a dedicated ESG team are recorded but engagements by mainstream portfolio managers are not). If so, select “Yes, we partially track the number of our engagements.”
LEA 08.2	This can include a discussion of: • the systems in place to track the progress of engagements; • a description of the information collected; • how regularly tracking systems are updated, and to whom this information is provided; and/or • any auditing procedures to ensure information recorded is accurate.
LOGIC	
LEA 08	[LEA 08.1] is applicable if you have engagements conducted by internal staff, in collaboration with other investors, or through service providers in [02.1]. If your organisation does not track or cannot provide partial information or reliable estimates on engagements, you will not see indicator [LEA 09], which asks you to provide information about the number of engagements. However, you will still be able to provide examples of your engagements later in this section [LEA 11]. [LEA 09] will be applicable if you reported that you track the number of your engagement activities in [LEA 08.1] (any of individual/internal, collaborative or service provider).

OUTPUTS AND OUTCOMES

LEA 09	Indicator status MANDATORY TO REPORT VOLUNTARY TO DISCLOSE	Purpose CORE & ADDITIONAL ASSESSED	Principle PRI 2

LEA 09	INDICATOR			
LEA 09.1	Indicate the proportion of companies in your listed equities portfolio with which your organisation engaged during the reporting year.			
		Number of companies engaged	**Proportion of companies engaged with, out of total listed equities portfolio**	
	Individual/Internal staff engagements			❍ We did not conduct any engagements in the reporting year.
	Collaborative engagements			❍ We did not conduct any engagements in the reporting year.
	Service-provider engagements			❍ We did not conduct any engagements in the reporting year.
LEA 09.2	Indicate the breakdown of engagements conducted within the reporting year by the number of interactions (including interactions made on your behalf).			
	No. of interactions with a company	**% of engagements**		
	One interaction	❍ >76% ❍ 51-75% ❍ 11-50% ❍ 1-10% ❍ None		
	2 to 3 interactions	❍ >76% ❍ 51-75% ❍ 11-50% ❍ 1-10% ❍ None		
	More than 3 interactions	❍ >76% ❍ 51-75% ❍ 11-50% ❍ 1-10% ❍ None		
	Total	**100%**		
LEA 09.3	Indicate the percentage of your collaborative engagements in which you were the leading organisation during the reporting year.			
		% leading role		
	Collaborative engagements	❍ >50% ❍ 10-50% ❍ <10% ❍ None		
LEA 09.4	Indicate the percentage of your service-provider engagements in which you had some involvement during the reporting year.			
		% of engagements with some involvement		
	Service-provider engagements	❍ >50% ❍ 10-50% ❍ <10% ❍ None		

LEA 09.5	Additional information [OPTIONAL]

LEA 09	**EXPLANATORY NOTES**
LEA 09	The indicator [LEA 09.1] is aligned with the ICGN Global Stewardship Principles.
LEA 09.1	This sub-indicator allows you to report the number and comprehensiveness of your engagements in the reporting year. Do not list engagement activities in which you did not have any interactions with the company in the reporting year. *Number of companies engaged* Please record the total number of **companies** (of which you have holdings) which you engaged in the reporting year, irrespective of the number of issues on which you engaged. *Engagements* Please record the proportion of the assets covered by the engagements out of your total listed equities holdings. *Avoid double counting* Make sure you list your engagements only in one of the three categories, based on the definitions provided. Do not count the same case of engagement with a company in more than one category. If you contract more than one service provider to conduct engagements with the same companies for the same issues, do not double count the number of companies engaged on your behalf (although a +/- 5% estimation of the overlap may be applied). *Do not include the following as engagements here:* • standard questionnaires sent to companies for the purpose of information gathering only (e.g., on products or ESG policies and performance for screening purposes); • attendance without interactions/discussion at a company presentation, AGM or other company meeting; • interactions intended to influence public policy or bodies that define industry best practices (these fall under the SGSG module); • CDP's disclosure requests on GHG emissions, water and forests (these are not captured as engagements but are reported in SG).SG You can, however, include your engagement with CDP engagement programmes, such as Carbon Action or Aiming for A; and/or • press releases or investor statements which an investor may publish in relation to an engagement with a company.
LEA 09.2	This indicator attempts to provide an understanding of the degree of comprehensiveness of an engagement. A greater number of interactions is considered to be indicative of a higher quality of engagement. The PRI recognises that this measurement alone cannot fully assess the quality of investors' engagements. Each organisation's context is different, and the LEA module therefore provides multiple indicator questions where signatories can detail their full approach. An interaction can be one of the following: letters and/or emails to companies, meetings and/or calls with the company's board/senior management, or with CSR, IR, or other management, visits to operations, visits to supplier(s) in the company's supply chain, etc.
LEA 09.3	This indicator attempts to provide an understanding of the level of involvement you had in your collaborative engagements. If you were highly involved (for example by, drafting letters, emails, other correspondence, attending meetings, directly contacting the company(ies) concerned, representing the collaborative engagement etc.), it would be considered that you took a leading role.
LEA 09.4	Partial involvement in your service-provider engagements can include:

	- defining the ESG issues to be raised, and the objectives to be achieved, with specific companies; - drafting joint letters to specific companies; - attending joint meetings and following-up on specific companies.
LOGIC	
LEA 09	[LEA 09] will be applicable if you reported that you track the number of your engagement activities in [LEA 08.1] (any of individual/internal, collaborative or service provider). Where "We did not complete any engagements in the reporting year" for an engagement type, the following indicators will not be relevant; • Individual / Internal Staff Engagements: [LEA 9.2] will be applicable • Collaborative Engagements: [LEA 09.2] and [LEA 09.3] will be applicable • Service Provider Engagements: [LEA 09.2] and [LEA 09.4] will be applicable.
ASSESSMENT	

LEA 09

Maximum score: Six ★ (Three ★ are Core; Three ★ are Additional)

The assessment of this indicator is based on your responses to [09.1] and [09.3 – 09.4]. It will be possible to receive a full score regardless of who conducts the engagements.

The assessment takes into account the number of engagements you conducted [09.1] and the level of involvement by the signatory [09.3 and 09.4].

Indicator scoring methodology

Algorithm

X = Number of companies x Level of involvement multiplier

Multiplier table

	None	**<10%**	**10-50%**	**>50%**
Leading Role / High involvement (LEA 09.3 and/or/09.4)	-	x 1	x 1.5	x 2

For **individual engagements**, the level of involvement is automatically considered to be 100%, and therefore, the multiplier applied is '**2**'.

The resulting figure is then converted to stars taking into consideration the AUM size (USD) using a scoring matrix:

AUM Size (USD)	**> 10 bn**	**5 – 9.99 bn**	**1 – 4.99 bn**	**0.1– 0.99bn**	**0-0.1bn**	**Score**
Score	<30	<20	<10	<4	<2	⭘
	>30	>20	>10	>4	>2	1★
	>90	>60	>40	>10	>4	2★
	>150	>100	>70	>20	>6	3★
	>210	>140	>100	>30	>8	4★
	>270	>180	>130	>40	>10	5★
	>330	>220	>160	>50	>12	6★

LEA 09	DEFINITIONS
LEA 09	For definitions of engagements, who conducts them, intensity and effort, please refer to the Main Definitions document.

LEA 10	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PRI 2

LEA 10	INDICATOR	
LEA 10.1	Indicate which of the following your engagement involved.	
	❍ Letters and emails to companies	❍ In a minority of cases ❍ In a majority of cases ❍ In all the cases
	❍ Meetings and/or calls with board/senior management	❍ In a minority of cases ❍ In a majority of cases ❍ In all the cases
	❍ Meetings and/or calls with the CSR, IR or other management	❍ In a minority of cases ❍ In a majority of cases ❍ In all the cases
	❍ Visits to operations	❍ In a minority of cases ❍ In a majority of cases ❍ In all the cases
	❍ Visits to supplier(s) in supplier(s) from the company's supply chain	❍ In a minority of cases ❍ In a majority of cases ❍ In all the cases
	❍ Participation in roadshows	❍ In a minority of cases ❍ In a majority of cases ❍ In all the cases
	❍ Other (specify) _____	❍ In a minority of cases ❍ In a majority of cases ❍ In all the cases
LEA 10.2	Additional information. [OPTIONAL]	

LEA 10	EXPLANATORY NOTES	
LEA 10.1	This indicator allows you to report on the action you take as part of your engagements, and the frequency with which you undertake such action.	
LEA 10.2	This can include a discussion of: • how you decide which action to take (e.g., depending on the size of a holding or the severity/materiality of the issue); • whether there is an escalation process that triggers different action; and/or • examples of positive engagement/dialogue based on one or a combination of actions listed above.	
ASSESSMENT		
LEA 10	Maximum score: Three ★ The assessment of this indicator is based on your responses to [10.1].	
	Indicator scoring methodology	
	Selected response	**Level score**
	No engagement types or only types in “a minority of cases”.	⭘
	One type selected in “a majority of cases” or “all the cases”.	★
	Two types selected in “a majority of cases” or in “all the cases”.	★★
	Three types or more selected in “a majority of cases” or in “all the cases”.	★★★

LEA 11	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle PRI 2

<table>
<tr><th>LEA 11</th><td colspan="5">INDICATOR</td></tr>
<tr><td rowspan="7">LEA 11.1</td><td colspan="5">Provide examples of the engagements that your organisation or your service provider carried out during the reporting year.</td></tr>
<tr><td>ESG Topic</td><td>Conducted by</td><td>Objectives</td><td>Scope and Process</td><td>Outcomes</td></tr>
<tr><td>Drop down:
Executive Remuneration
Climate change
Human rights
Company leadership issues
Pollution
General ESG
Diversity
Shareholder rights
Health and safety
Sustainability reporting
Water risks
Labour practices and supply chain management
Anti-bribery and corruption
Deforestation
Aggressive tax planning
Cyber security
Other governance
Plastics
Other
Multiple</td><td>Drop down:
Individual/Internal
Collaborative
Service provider</td><td>[200 words]</td><td>[200 words]</td><td>Drop down:
Company changed practice
Company committed to change
Disclosure/report published
Divestment
Failed/no outcome
Increased understanding/information
Invested in company
On-going
Voting
Other</td></tr>
<tr><td>[same as above]</td><td>[same as above]</td><td>[same as above]</td><td>[same as above]</td><td>[same as above]</td></tr>
<tr><td>[same as above]</td><td>[same as above]</td><td>[same as above]</td><td>[same as above]</td><td>[same as above]</td></tr>
<tr><td>[same as above]</td><td>[same as above]</td><td>[same as above]</td><td>[same as above]</td><td>[same as above]</td></tr>
<tr><td>[same as above]</td><td>[same as above]</td><td>[same as above]</td><td>[same as above]</td><td>[same as above]</td></tr>
<tr><td>LEA 11.2</td><td colspan="5">Additional information
[OPTIONAL]</td></tr>
</table>

LEA 11	EXPLANATORY NOTES
LEA 11	The indicator [LEA 11.1] is aligned with the OECD Responsible Business Conduct for Institutional Investors recommendations.
LEA 11.1	*Number of examples*

	We suggest that you provide at least three examples. As far as is practicable, examples should be chosen to provide a rounded picture of your engagement activities, covering the range of topics on which you engaged. Examples can be focused on a theme, or they may be engagements with a specific company. You might want to provide examples of engagements that concluded and achieved positive results, as well as on-going engagements on ESG issues that are a priority for your organisation. *ESG topic* Select the specific ESG topic of the engagement. If the relevant topic is not available, please select "Other" and specify in the Scope and Process column. *Conducted by* Clarify who was the main driver in the engagement: you directly, your organisation through a collaboration or a service provider. *Objectives* Specify the goals and/or motivations for the engagement. *Scope and Process* You may wish to comment on the number of companies with which you engaged on the issue in question, their relative size in terms of the percentage of your portfolio or total AUM, your approach to the engagement (e.g., letters, face-to-face meetings) and relative engagement strategies (e.g., private dialogue, linkage with proxy voting decisions etc.) *Outcomes* Select the outcome of the engagement. If the relevant outcome is not available, please select "Other" and specify in the Scope and Process column.

Examples					
ESG factor	**ESG issue**	**Conducted by**	**Objectives**	**Scope and Process**	**Outcomes**
Select from the drop-down menu the most applicable E, S or G theme, or multiple.	Use of uncertified Indonesian wood in paper manufacturing, presenting a significant risk to companies' reputation	Internal staff	Company commitment to sourcing only from certified forests	We engaged with 15 companies. They represent 18% (by number) of the companies in our portfolio which we believe may be exposed to this risk. We conducted numerous meetings with all the companies, including with Directors serving on the Board.	Seven of the companies contacted have agreed to change their purchasing practices, and two of these have issued new policy statements on this issue. Our holdings in some of these companies have increased as a result of the engagement.
	Corporate governance	Internal staff	Split Chairman and CEO roles	We met with 6 US-listed companies that currently have a combined Chairman/CEO. This represents x% of the US companies we hold that have a joint Chairman/CEO.	We are awaiting formal responses to our proposals from these companies.

SECTION

(Proxy) voting and shareholder resolutions

LEA 12	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle PRI 2

LEA 12	INDICATOR	
LEA 12.1	Indicate how you typically make your (proxy) voting decisions.	
	Approach	**Based on**
	❍ We use our own research or voting team and make voting decisions without the use of service providers.	❍ Our own voting policy ❍ Our clients' requests or policies ❍ Other (explain) _____
	❍ We hire service providers who make voting recommendations and/or provide research that we use to guide our voting decisions.	❍ The service-provider voting policy we sign off on ❍ Our own voting policy ❍ Our clients' requests or policies ❍ Other (explain) _____
	❍ We hire service providers who make voting decisions on our behalf, except in some pre-defined scenarios where we review and make voting decisions.	❍ The service-provider voting policy we sign off on ❍ Our own voting policy ❍ Our clients' requests or policies ❍ Other (explain) _____
	❍ We hire service providers who make voting decisions on our behalf.	❍ The service-provider voting policy we sign off on ❍ Our own voting policy ❍ Our clients' requests or policies ❍ Other (explain) _____
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.	
LEA 12.3	Additional information. [OPTIONAL]	

LEA 12	EXPLANATORY NOTES
LEA 12	The indicator [LEA 12.1] is aligned with the ICGN Global Stewardship Principles.
LEA 12.1	If you select the latter two responses, combined with "our own voting policy," the word "decisions" implies that your service provider is implementing your voting policy and framework. If you select "Other," this will affect the peer group to which you are allocated. If you base your voting decisions partly on a policy developed in-house and partly on your service provider's or a client's policy, please indicate which is the most significant factor in the majority of cases.
LEA 12.2	This can include a discussion of: • examples when your organisation voted not in accordance with your agreed-upon voting policy; • how your organisation monitors whether selected service provider(s) have made voting decisions in accordance with your agreed-upon voting policy.
LEA 12.3	This can include a discussion of: • who is involved in making final voting decisions internally (e.g., ESG/proxy voting dedicated team, and/or portfolio managers); • criteria used to review a service provider's recommendations; • situations in which there is more than one decision maker (e.g., if you delegate all voting decisions on corporate governance matters to a service provider, but you make all voting decisions on environmental and social issues internally); • situations in which decisions may be made jointly.
LOGIC	
LEA 12.2	[LEA 12.2] is triggered if '(Proxy) voting approach' is selected in [LEA 01.3].

LEA 13	Indicator status MANDATORY	Purpose ADDITIONAL ASSESSED	Principle PRI 2

LEA 13	INDICATOR
LEA 13.1	Of the voting recommendations that your service provider made in the reporting year, indicate the percentage that was reviewed by your organisation, giving the reasons.
	Percentage of voting recommendations your organisation reviewed
	❍ 100-75%, ❍ 74-50%, ❍ 49-25%, ❍ 24-1%, ❍ None
	Reasons for review
	❑ Specific environmental and/or social issues ❑ Votes concerning significant holdings ❑ Votes against management and/or abstentions ❑ Conflicts of interest ❑ Corporate action, such as M&As, disposals, etc. ❑ Votes concerning companies with which we have an active engagement ❑ Client requests ❑ Ad-hoc oversight of service provider ❑ Shareholder resolutions ❑ Share blocked securities ❑ Other (explain) _____
LEA 13.2	Additional information. [OPTIONAL]

LEA 13	EXPLANATORY NOTES
LEA 13	The indicator [LEA 13.1] is aligned with the ICGN Global Stewardship Principles.
LEA 13	The purpose of this indicator is to allow you, if in some situations you review your service provider's recommendations, to explain the level and nature of your involvement.
LOGIC	
LEA 13	[LEA 13.1] is applicable if you select in [LEA 12.1] "We hire service providers who make voting decisions on our behalf, except in some pre-defined scenarios where we review and make voting decisions."
ASSESSMENT	

LEA 13.1	Maximum score: Three ★		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	None	⭘	
	24-1%	★	
	49-25%	★★	
	50% or more	★★★	

LEA 14	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PRI 2

LEA 14	INDICATOR
LEA 14.1	Does your organisation have a securities lending programme? ❍ Yes ❍ No
LEA 14.2	Describe why your organisation does not lend securities.
LEA 14.3	Indicate how the issue of voting is addressed in your securities lending programme. ❍ We recall all securities for voting on all ballot items ❍ We maintain some holdings, so that we can vote at any time ❍ We systematically recall some securities so that we can vote on their ballot items (e.g., in line with specific criteria) ❍ We recall some securities so that we can vote on their ballot items on an ad-hoc basis ❍ We empower our securities-lending agent to decide when to recall securities for voting purposes ❍ We do not recall our securities for voting purposes ❍ Other (specify) _____
LEA 14.4	Additional information. [OPTIONAL]

LEA 14	**EXPLANATORY NOTES**
LEA 14	The indicator [LEA 14.1] is aligned with the ICGN Global Stewardship Principles.
LEA 14.3	If you recall shares on the basis of specific criteria, please explain these criteria, including any ESG issues which they address. If you occasionally recall shares, please explain the circumstances under which you do this.
LOGIC	
LEA 14	[LEA 14.2] is applicable if you report "No" in [LEA 14.1]. [LEA 14.3] is applicable if you report "Yes" in [LEA 14.1].
ASSESSMENT	
LEA 14	Maximum score: Three ★ The assessment of this indicator is based on your responses to [14.1] and [14.3].
	Indicator scoring methodology

Selected response	**Level score**	**Further Details**

	"No" in [14.1].	N/A	You are not assessed on this indicator.
	"Yes" in [14.1] AND "We do not recall our shares for voting purposes" in [14.3].	⭘	
	"Yes" in [14.1] AND "We recall some securities so that we can vote on their ballot items on an ad-hoc basis" in [14.3] OR "Yes" in [14.1] AND "We empower our securities-lending agent to decide when to recall securities for voting purposes" in [14.3].	★	
	"Yes" in [14.1] AND "We systematically recall some securities so that we can vote on their ballot items (e.g., in line with specific criteria)" or "We maintain some holdings, so that we can vote at any time" in [14.3].	★★	
	"Yes" in [14.1] AND "We recall all securities for voting on all ballot items" in [14.3].	★★★	

LEA 14	**DEFINITION**
Securities lending programme	A transaction in which the beneficial owner of the securities, normally a large institutional investor (such as a pension fund or mutual fund), agrees to lend its securities to a borrower (such as a hedge fund) in exchange for collateral consisting of cash and/or government securities.

LEA 15	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle PRI 2

LEA 15	INDICATOR
LEA 15.1	Indicate the proportion of votes participated in within the reporting year in which where you or the service providers acting on your behalf raised concerns with companies ahead of voting. ❍ 100% ❍ 99-75% ❍ 74-50% ❍ 49-25% ❍ 24-1% ❍ Neither we nor our service provider(s) raise concerns with companies ahead of voting
LEA 15.2	Indicate the reasons for raising your concerns with these companies ahead of voting. ❑ Vote(s) concerned selected markets ❑ Vote(s) concerned selected sectors ❑ Vote(s) concerned certain ESG issues ❑ Vote(s) concerned companies exposed to controversy on specific ESG issues ❑ Vote(s) concerned significant shareholdings ❑ Client request ❑ Other; explain _____
LEA 15.3	Additional information. [OPTIONAL]

LEA 15	EXPLANATORY NOTES
LEA 15	The indicator [LEA 15.1] is aligned with the ICGN Global Stewardship Principles.
LEA 15.3	This can include a discussion of the process by which you would raise concerns with companies ahead of voting.
LOGIC	
LEA 15	[LEA 15.2] is applicable if an option is between 1-99% is reported in [LEA 15.1].

LEA 15	DEFINITION
Significant shareholding	What exactly qualifies as a significant shareholding is based on your policies, but typically holdings above 1% of a company's total shares outstanding (by number) are considered significant.

LEA 16	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 2

LEA 16	INDICATOR	
LEA 16.1	Indicate the proportion of votes where you, and/or the service provider(s) acting on your behalf, communicated the rationale to companies for abstaining or voting against management recommendations. Indicate this as a percentage out of all eligible votes. ❍ 100% ❍ 99–-75% ❍ 74–-50% ❍ 49–-25% ❍ 24–-1% ❍ We do not communicate the rationale to companies ❍ Not applicable because we and/or our service providers did not abstain or vote against management recommendations	
LEA 16.2	Indicate the reasons why your organisation would communicate to companies, the rationale for abstaining or voting against management recommendations. ❑ Vote(s) concern selected markets ❑ Vote(s) concern selected sectors ❑ Vote(s) concern certain ESG issues ❑ Vote(s) concern companies exposed to controversy on specific ESG issues ❑ Vote(s) concern significant shareholdings ❑ Client request ❑ Other; explain _____	
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.	
	❍ Yes	❍ No
LEA 16.4	Additional information. [OPTIONAL]	

LEA 16	EXPLANATORY NOTES		
LEA 16.4	This can include a discussion of: • the criteria according to which you would communicate the rationale to companies following a vote; • the criteria according to which you make public your voting decisions.		
LOGIC			
LEA 16	[LEA 16.2] is applicable if an option between 1-99% is reported in [LEA 16.1]. [LEA 16.3] is applicable if an option between 1-100% is reported in [LEA 16.1].		
ASSESSMENT			
LEA 16	Maximum score: Three ★ The assessment of this indicator is based on your responses to [16.1].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	Not applicable because we and/or our service providers did not abstain or vote against management recommendations	N/A	
	We do not communicate the rationale to companies	○	
	Less than 50%	★	
	74–50%	★★	
	75% or more	★★★	

LEA 16	DEFINITIONS
Significant shareholding	What exactly qualifies as a significant shareholding is based on your policies, but typically, holdings above 1% of a company's total shares outstanding (by number) are considered significant.

LEA 17	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 2

<table>
<tr><td>LEA 17</td><td colspan="2">INDICATOR</td></tr>
<tr><td rowspan="3">LEA 17.1</td><td colspan="2">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.</td></tr>
<tr><td>Votes cast (to the nearest 1%)</td><td>Specify the basis on which this percentage is calculated.</td></tr>
<tr><td>_____ %

❑ We do not track or collect this information.</td><td>❍ Of the total number of ballot items on which you could have issued instructions
❍ Of the total number of company meetings at which you could have voted
❍ Of the total value of your listed equity holdings on which you could have voted</td></tr>
<tr><td>LEA 17.2</td><td colspan="2">Explain your reason(s) for not voting on certain holdings:

❑ Shares were blocked
❑ Notice, ballots or materials not received on time
❑ Missed deadline
❑ Geographical restrictions (non-home market)
❑ Cost
❑ Conflicts of interest
❑ Holdings deemed too small
❑ Administrative impediments (e.g., power of attorney requirements, ineligibility due to participation in share placement)
❑ Client request
❑ Other (explain) _____</td></tr>
<tr><td>LEA 17.3</td><td colspan="2">Additional information.
[OPTIONAL]</td></tr>
</table>

LEA 17	EXPLANATORY NOTES		
LEA 17.1	*For investment managers* When calculating the percentage of votes cast, please include only those holdings for which you have a client mandate to vote. If you do not have a mandate, do not include those holdings. *For asset owners* When calculating the percentages of votes cast, please include only those holdings for which you or your service providers have the mandate to vote. If you have given your investment manager the mandate to vote on your behalf on part of your holdings, do not include those holdings in the numerator or denominator of this ratio.		
LOGIC			
LEA 17	[LEA 17.2] is applicable if you report the percentage of votes cast as less than 100% in [LEA 17.1].		
ASSESSMENT			
LEA 17	Maximum score: Three ★ The assessment of this indicator is based on the percentage reported in [17.1].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	"We do not track or collect this information" OR <30%	○	
	30–80%	★	
	81–95%	★★	
	>95%	★★★	

LEA 18	Indicator status VOLUNTARY	Purpose ADDITIONAL ASSESSED	Principle PRI 2

LEA 18	INDICATOR	
LEA 18.1	Indicate whether you track the voting instructions that you or your service provider on your behalf have issued.	
	❍ Yes, we track this information.	❍ No, we do not 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:	
	Voting instructions	**Breakdown as percentage of votes cast**
	For (supporting) management recommendations	%
	Against (opposing) management recommendations	%
	Abstentions	%
	Total	**100%**
LEA 18.3	In cases where your organisation voted against management recommendations, indicate the percentage of companies which you have engaged.	
	%	
LEA 18.4	Additional information. [OPTIONAL]	

LEA 18	EXPLANATORY NOTES
LEA 18	The indicator [LEA 18.1] is aligned with the ICGN Global Stewardship Principles.
LEA 18.3	You may wish to discuss: • how the decision to vote against management is part of your engagement programme • how you communicate with affected companies before and after the vote • how you monitor a company's reaction and eventual changes to internal ESG ratings • how you communicate internally about the vote (e.g., to portfolio managers)
LOGIC	
LEA 18	[LEA 18.2] is applicable if you report "Yes, we track this information" in [LEA 18.1]. [LEA 18.3] is applicable if you report an amount above 0% in 'Against management recommendations' in [LEA 18.2].
ASSESSMENT	
LEA 18	Maximum score: Three ★ The assessment of this indicator is based on the percentage reported in [18.1].

Indicator scoring methodology		
Selected response	**Level score**	**Further Details**
"No, we do not track this information."	○	
"Yes, we track this information."	★★★	

LEA 18	DEFINITION
Abstentions	Under some voting systems, shareholders are only given the option to vote 'for' a resolution, or to 'withhold' their support (e.g., for a director election). For the purpose of this indicator, 'withhold' votes that have the effect of a vote opposing the recommendation should be included under 'against' management recommendations.

LEA 19	Indicator status MANDATORY	Purpose CORE ASSESSED	Principle PRI 2

LEA 19	INDICATOR	
LEA 19.1	Indicate whether your organisation has a formal escalation strategy following unsuccessful voting.	
	❍ Yes	❍ No
LEA 19.2	Indicate the escalation strategies used at your organisation following abstentions and/or votes against management. ❑ 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, specify_____	
LEA 19.3	Additional information. [OPTIONAL]	

LEA 19	EXPLANATORY NOTES
LEA 19.1	This indicator considers unsuccessful voting as a situation in which the desired outcome of your organisation's voting is not achieved.
LEA 19.3	This indicator gives organisations the ability to outline their strategy in circumstances where voting was unsuccessful, and/or the desired outcome was not achieved.
LOGIC	
LEA 19	[LEA 19.2] is applicable if "Yes" is reported in [LEA 19.1].

ASSESSMENT			
LEA 19	Maximum score: Three ★ The assessment of this indicator is based on the percentage reported in [19.1] and [19.2].		
	Indicator scoring methodology		
	Selected response	**Level score**	**Further Details**
	"No" in LEA 19.1.	⭘	
	"Yes" in LEA 19.1 and one option in LEA 19.2.	★	"Other" is not counted as an option towards your assessment
	"Yes" in LEA 19.1 and two options in LEA 19.2.	★★	"Other" is not counted as an option towards your assessment
	"Yes" in LEA 19.1 and at least three options in LEA 19.2.	★★★	"Other" is not counted as an option towards your assessment

LEA 20	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle PRI 2

LEA 20	INDICATOR	
LEA 20.1	Indicate whether your organisation, directly or through a service provider, filed or co-filed any ESG shareholder resolutions during the reporting year.	
	❍ Yes	❍ No
LEA 20.2	Indicate the number of ESG shareholder resolutions you filed or co-filed.	
	Total number	
LEA 20.3	Indicate what percentage of these ESG shareholder resolutions resulted in the following:	
	Went to vote	%
	Were withdrawn due to changes at the company and/or negotiations with the company	%
	Were withdrawn for other reasons	%
	Were rejected/not acknowledged by the company	%
	Total	**100%**
LEA 20.4	Of the ESG shareholder resolutions that you filed or co-filed and that were put to a vote (i.e., not withdrawn), indicate the percentage that received approval:	
	>50%;	
	50–20%;	
	<20%.	
LEA 20.5	Describe the ESG shareholder resolutions that you filed or co-filed, and the outcomes achieved.	
	[200 words]	
LEA 20.6	Describe whether your organisation reviews ESG shareholder resolutions filed by other investors.	
	[200 words]	
LEA 20.7	Additional information. [OPTIONAL]	

LEA 20	EXPLANATORY NOTES
LEA 20	This indicator is intended to capture both the number and nature of ESG shareholder resolutions that you filed or co-filed, and the outcomes of any engagement associated with the filing of resolutions.
LEA 20.5	Your description of the ESG shareholder resolutions can include: • the rationale for filing these resolutions, including the relationship with your current engagement programme; • the process undertaken to generate the support required to submit the resolution; • the subject(s) of the resolution(s); • the markets in which they were filed; • why some resolutions were withdrawn; • whether company management changed its approach to address your concerns, or other outcomes that resulted.
LEA 20.6	You may wish to discuss: • the criteria which you or your service providers consider to support an ESG shareholder resolution; • whether you internally review all or some of the ESG resolutions filed; • whether you outsource entirely the review process to your service provider(s).
LOGIC	
LEA 20	[LEA 20.2] will be applicable if you select “Yes” in [LEA 20.1]. [LEA 20.3, LEA 20.4 and LEA 20.5] will be applicable if you report more than zero ESG shareholder resolutions in [LEA 20.2].

LEA 21	Indicator status VOLUNTARY	Purpose DESCRIPTIVE	Principle PRI 2

LEA 21	INDICATOR				
LEA 21.1	Provide examples of the (proxy) voting activities that your organisation and/or service provider carried out during the reporting year.				
	ESG Topic	**Conducted by**	**Objectives**	**Scope and Process**	**Outcomes**
	Drop down: • Executive remuneration • Climate change • Human rights • Company leadership issues • Pollution • General ESG • Diversity • Shareholder rights • Health and safety • Sustainability reporting • Water risks • Labour practices and supply chain management • Anti-bribery and corruption • Deforestation • Aggressive tax planning • Cyber security • Political spending / lobbying • Other governance • Plastics • Other Multiple	Drop down: • Individual /Internal • Service provider	[200 words]	[200 words]	Drop down: • Company changed practice • Company committed to change • Disclosure/report published • Divestment • Failed/no outcome • Increased understanding/information • Invested in company • On-going • Voting • Other
	[same as above]	[same as above]	[same as above]	[same as above]	[same as above]
	[same as above]	[same as above]	[same as above]	[same as above]	[same as above]
	[same as above]	[same as above]	[same as above]	[same as above]	[same as above]
	[same as above]	[same as above]	[same as above]	[same as above]	[same as above]
LEA 21.2	Additional information [OPTIONAL]				

Examples				
ESG topic	**Conducted by**	**Objectives**	**Scope and Process**	**Outcomes**
Select from drop down menu the most applicable E, S or G topic.	Internal staff	To ensure that executive remuneration is aligned with shareholder interests	We focused on AIM-listed companies held in our small cap funds (a total of approximately 25 companies) and decided to vote against 8 remuneration packages.	Following these votes, two companies engaged with us (see engagement section of this report) on how they can ensure that their remuneration practices are supported by investors, and they undertook to make changes prior to next year's AGM.

LEA 21	**EXPLANATORY NOTES**
LEA 21	*Number of examples* The number of examples that you provide will depend on how you structure your voting activities. We suggest that you provide at least three and up to 10 examples. As far as is practicable, these examples should be chosen to provide a rounded picture of your organisation's voting activities. *ESG topic* Specify the E, S and/or G topic. *Decision made by* Select whether the voting decision was made internally (e.g., dedicated ESG/proxy voting team or portfolio manager) or by a service provider. *Objectives* Describe the voting outcome you expected, and any underlying motivations for voting in this way. *Scope and process* For example, you might indicate whether (before or after the vote) the company was informed of your voting decision, how the decision was taken, the relationship with your engagement programme, the number of companies the voting topic applied to, and the AUM they represent. *Outcomes* Describe the changes, if any, in corporate practice that resulted from the voting decision.