



RITRANSPARENCY REPORT 2020

Fondo Pensione Gruppo Intesa Sanpaolo





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 2020 reporting cycle. 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. As a result, the reports can be extensive. However, to help easily locate information, there is a **Principles index** which highlights where the information can be found and summarises the indicators that signatories complete and disclose.

Understanding the Principles Index

The Principles Index summarises the response status for the individual indicators and modules and shows how these relate to the six <u>Principles for Responsible Investment</u>. It can be used by stakeholders as an 'at-a-glance' summary of reported information and to identify particular themes or areas of interest.

Indicators can refer to one or more Principles. Some indicators are not specific to any Principle. These are highlighted in the 'General' column. When multiple Principles are covered across numerous indicators, in order to avoid repetition, only the main Principle covered is highlighted.

All indicators within a module are presented below. The status of indicators is shown with the following symbols:

Symbol	Status
✓	The signatory has completed all mandatory parts of this indicator
Ø	The signatory has completed some parts of this indicator
•	This indicator was not relevant for this signatory
-	The signatory did not complete any part of this indicator
Ъ	The signatory has flagged this indicator for internal review

Within the table, indicators marked in blue are mandatory to complete. Indicators marked in grey are voluntary to complete.



Principles Index



Organisa	ntional Overview			Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
OO TG	·	8	n/a							
00 01	Signatory category and services	✓	Public							√
00 02	Headquarters and operational countries	✓	Public							✓
OO 03	Subsidiaries that are separate PRI signatories	✓	Public							✓
OO 04	Reporting year and AUM	✓	Public							✓
OO 05	Breakdown of AUM by asset class	~	Asset mix disclosed in OO 06							√
OO 06	How would you like to disclose your asset class mix	✓	Public							✓
OO 07	Fixed income AUM breakdown	✓	Private							✓
OO 08	Segregated mandates or pooled funds	✓	Private							✓
OO 09	Breakdown of AUM by market	✓	Public							✓
OO 10	Active ownership practices for listed assets	✓	Public							✓
00 11	ESG incorporation practices for all assets	✓	Public							✓
00 12	Modules and sections required to complete	✓	Public							✓
OO LE 01	Breakdown of listed equity investments by passive and active strategies	8	n/a							✓
OO LE 02	Reporting on strategies that are <10% of actively managed listed equities	8	n/a							✓
OO FI 01	Breakdown of fixed income investments by passive and active strategies	8	n/a							✓
OO FI 02	Reporting on strategies that are <10% of actively managed fixed income	8	n/a							✓
OO FI 03	Fixed income breakdown by market and credit quality	8	n/a							✓
OO SAM 01	Breakdown of externally managed investments by passive and active strategies	✓	Private							✓
OO PE 01	Breakdown of private equity investments by strategy	8	n/a							✓
OO PE 02	Typical level of ownership in private equity investments	8	n/a							✓
00 PR 01	Breakdown of property investments	8	n/a							✓
00 PR 02	Breakdown of property assets by management	8	n/a							✓
00 PR 03	Largest property types	8	n/a							✓
OO INF 01	Breakdown of infrastructure investments	8	n/a							✓
OO INF 02	Breakdown of infrastructure assets by management	8	n/a							✓
OO INF 03	Largest infrastructure sectors	8	n/a							✓
OO HF 01	Breakdown of hedge funds investments by strategies	8	n/a							✓
OO End	Module confirmation page	✓	-							

CCStrate	CStrategy and Governance					rin	cip	le		General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
SG 01	RI policy and coverage	✓	Public							✓
SG 01 CC	Climate risk	✓	Private							✓
SG 02	Publicly available RI policy or guidance documents	✓	Public						✓	
SG 03	Conflicts of interest	✓	Public							✓
SG 04	Identifying incidents occurring within portfolios	✓	Private							✓
SG 05	RI goals and objectives	✓	Public							✓
SG 06	Main goals/objectives this year	✓	Private							✓
SG 07	RI roles and responsibilities	✓	Public							✓
SG 07 CC	Climate-issues roles and responsibilities	✓	Private							✓
SG 08	RI in performance management, reward and/or personal development	✓	Private							✓
SG 09	Collaborative organisations / initiatives	✓	Public				✓	✓		
SG 09.2	Assets managed by PRI signatories	✓	Private	✓						
SG 10	Promoting RI independently	✓	Public				✓			
SG 11	Dialogue with public policy makers or standard setters	✓	Private				✓	✓	✓	
SG 12	Role of investment consultants/fiduciary managers	✓	Public				✓			
SG 13	ESG issues in strategic asset allocation	✓	Public	✓						
SG 13 CC		8	n/a							✓
SG 14	Long term investment risks and opportunity	✓	Private	~						
SG 14 CC		✓	Private							✓
SG 15	Allocation of assets to environmental and social themed areas	✓	Private	✓						
SG 16	ESG issues for internally managed assets not reported in framework	8	n/a							✓
SG 17	ESG issues for externally managed assets not reported in framework	✓	Public							✓
SG 18	Innovative features of approach to RI	✓	Private							✓
SG 19	Communication	✓	Public		✓				✓	
SG End	Module confirmation page	✓	-							

Indirect -	ndirect – Manager Selection, Appointment and Monitoring					rin		General		
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
SAM 01	ESG incorporation strategies	✓	Public	✓						
SAM 02	Selection processes (LE and FI)	✓	Public	✓						
SAM 03	Evaluating engagement and voting practices in manager selection (listed equity/fixed income)	8	n/a		~					
SAM 04	Appointment processes (listed equity/fixed income)	8	n/a	~						
SAM 05	Monitoring processes (listed equity/fixed income)	✓	Public	~						
SAM 06	Monitoring on active ownership (listed equity/fixed income)	8	n/a	✓						
SAM 07	Percentage of (proxy) votes	8	n/a		✓					
SAM 08	Percentage of externally managed assets managed by PRI signatories	✓	Private	~						
SAM 09	Examples of ESG issues in selection, appointment and monitoring processes	✓	Public	~					✓	
SAM End	Module confirmation page	✓	-							

Direct - L	Direct - Listed Equity Active Ownership					rin	General			
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
LEA 01	Description of approach to engagement	✓	Public		✓					
LEA 02	Reasoning for interaction on ESG issues	✓	Public	✓	✓	✓				
LEA 03	Process for identifying and prioritising engagement activities	✓	Public		✓					
LEA 04	Objectives for engagement activities	✓	Public		✓					
LEA 05	Process for identifying and prioritising collaborative engagement	✓	Public		✓					
LEA 06	Role in engagement process	✓	Public		✓		✓			
LEA 07	Share insights from engagements with internal/external managers	✓	Private	✓	✓					
LEA 08	Tracking number of engagements	✓	Public		✓					
LEA 09	Number of companies engaged with, intensity of engagement and effort	✓	Private		✓					
LEA 10	Engagement methods	✓	Private		✓					
LEA 11	Examples of ESG engagements	-	n/a		✓					
LEA 12	Typical approach to (proxy) voting decisions	✓	Public		✓					
LEA 13	Percentage of voting recommendations reviewed	8	n/a		✓					
LEA 14	Securities lending programme	✓	Private		✓					
LEA 15	Informing companies of the rationale of abstaining/voting against management	✓	Public		✓					
LEA 16	Informing companies of the rationale of abstaining/voting against management	✓	Public		✓					
LEA 17	Percentage of (proxy) votes cast	✓	Public		✓					
LEA 18	Proportion of ballot items that were for/against/abstentions	✓	Private		✓					
LEA 19	Proportion of ballot items that were for/against/abstentions	✓	Public		✓					
LEA 20	Shareholder resolutions	✓	Private		✓					
LEA 21	Examples of (proxy) voting activities	-	n/a		✓					
LEA End	Module confirmation page	✓	-							

Confider	Confidence building measures					rin	General			
Indicator	Short description	Short description Status Disclosure		1	2	3	4	5	6	
CM1 01	Assurance, verification, or review	✓	Public							✓
CM1 02	Assurance of last year`s PRI data	✓	Public							✓
CM1 03	Other confidence building measures	✓	Public							✓
CM1 04	Assurance of this year`s PRI data	✓	Public							✓
CM1 05	External assurance	8	n/a							✓
CM1 06	Assurance or internal audit	8	n/a							✓
CM1 07	Internal verification	✓	Public							✓
CM1 01 End	Module confirmation page	✓	-							



Fondo Pensione Gruppo Intesa Sanpaolo

Reported Information

Public version

Organisational Overview

PRI disclaimer

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	Basic	info	rmation			
000	1	Mar	ndatory	Public	Gateway/Peering	General
	00 01	.1	Select the type that best describes	your organisation of	or the services you provide.	
	○ Nor	n-corp	orate pension or superannuation or re	tirement or provide	ent fund or plan	
	Cor	porate	e pension or superannuation or retiren	nent or provident fu	ind or plan	
			company			
	○ Fou					
	O End					
		-	nent finance institution sovereign or government controlled f	fund		
	○ Far			una		
	O Oth	-				
00 0	2	Mar	ndatory	Public	Peering	General
	00 02	2.1	Select the location of your organisa	ition's headquarters	S.	
	Italy					
	00 02	2.2	Indicate the number of countries in	which you have of	fices (including your headquarters	5).
	1					
	○ 2-5 ○ 6-1					
	O 5-10					
	0 >10	,				
	OO 02	2.3	Indicate the approximate number o	f staff in your orgar	nisation in full-time equivalents (F	TE).
'						
			FTE			
	25					
000	3	Mar	ndatory	Public	Descriptive	General
	OO 03	3.1	Indicate whether you have subsidia their own right.	aries within your org	ganisation that are also PRI signa	tories in
	○ Yes	3				
	No					
00 0	4	Mar	ndatory	Public	Gateway/Peering	General

$\boldsymbol{\frown}$	$\boldsymbol{\sim}$	\mathbf{a}	

Indicate the year end date for your reporting year.

31/12/2019

00 04.2

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

Include the AUM of subsidiaries, but exclude advisory/execution only assets, and exclude the assets of your PRI signatory subsidiaries that you have chosen not to report on in OO 03.2

	trillions	billions	millions	thousands	hundreds
Total AUM		7	000	000	000
Currency	USD				
Assets in USD		7	000	000	000

 $[\]hfill\square$ Not applicable as we are in the fund-raising process

OO 06 Mandatory Public Descriptive General

OO 06.1

Select how you would like to disclose your asset class mix.

 \bigcirc as percentage breakdown

as broad ranges

	Internally managed (%)	Externally managed (%)
Listed equity	0	10-50%
Fixed income	0	>50%
Private equity	0	<10%
Property	0	<10%
Infrastructure	0	0
Commodities	0	0
Hedge funds	0	0
Fund of hedge funds	0	0
Forestry	0	0
Farmland	0	0
Inclusive finance	0	0
Cash	0	0
Money market instruments	0	<10%
Other (1), specify	0	<10%
Other (2), specify	0	0

OO 06.2	Publish asset	class mix as	per attached	image [Optional].
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OO 06.3

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

○ Yes

 \bigcirc No



OO 06.5

Indicate whether your organisation uses fiduciary managers.

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

OO 09	Mand	atory	Public	Peering	General
00 09	9.1	Indicate the breakdown of your orga	anisation's AUM by	market.	
		Developed Markets			
095	5				
		Emerging Markets			
5					
		Frontier Markets			
0					
		Other Markets			
0					
		Total 100%			
100%	ò				
00 09	9.2	Additional information. [Optional]			

Asset class implementation gateway indicators						
00 10	Mar	ndatory	Public	Gateway	General	
OO 10.1 Select the active ownership activities your organisation implemented		on implemented in the repor	rting year.			
		Listed equity – engagement				
\checkmark	☑ We engage with companies on ESG factors via our staff, collaborations or service providers.					
	\square 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	Listed equity – voting					
☑ We cast our (proxy) votes directly or via dedicated voting pro	viders					
$\hfill\square$ We require our external managers to vote on our behalf.						
\square We do not cast our (proxy) votes directly and do not require ϵ	☐ We do not cast our (proxy) votes directly and do not require external managers to vote on our behalf					
Fixed income SSA – engagement	Fixed income SSA – engagement					
☑ We engage with SSA bond issuers on ESG factors via our	staff, collaborations or service provide	ers.				
$\hfill \square$ We require our external managers to engage with SSA both	nd issuers on ESG factors on our beha	alf.				
$\hfill\Box$ We do not engage directly and do not require external mar ESG factors. Please explain why you do not.	nagers to engage with SSA bond issue	ers on				
Fixed income Corporate (financial) – engageme	ent					
☑ We engage with companies on ESG factors via our staff, or	ollaborations or service providers.					
\square We require our external managers to engage with compan	ies on ESG factors on our behalf.					
☐ We do not engage directly and do not require external managers to engage with companies on ES factors. Please explain why you do not.						
Fixed income Corporate (non-financial) – engaç	gement					
☑ We engage with companies on ESG factors via our staff, or	ollaborations or service providers.					
$\hfill\square$ We require our external managers to engage with compan	ies on ESG factors on our behalf.					
$\hfill\square$ We do not engage directly and do not require external mar factors. Please explain why you do not.	nagers to engage with companies on E	ESG				
11 Mandatory Public	Gateway	General				
Select the externally managed assets classes in what address ESG incorporation in your external managed						

processes.



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			
	\square We incorporate ESG into our external manager appointment process			
	☑ We incorporate ESG into our external manager monitoring process			
	☐ 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			
	☑ We incorporate ESG into our external manager selection process			
	☐ We incorporate ESG into our external manager appointment process			
	☑ We incorporate ESG into our external manager monitoring process			
	☐ We do not do ESG incorporation			
Fixed income - corporate				
(financial)	Fixed income - corporate (financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes			
	☑ We incorporate ESG into our external manager selection process			
	☐ We incorporate ESG into our external manager appointment process			
	☑ We incorporate ESG into our external manager monitoring process			
	☐ We do not do ESG incorporation			
Fixed income - corporate				
(non-financial)	Fixed income - corporate (non-financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes			
	☑ We incorporate ESG into our external manager selection process			
	☐ We incorporate ESG into our external manager appointment process			
	☑ We incorporate ESG into our external manager monitoring process			
	☐ We do not do ESG incorporation			
Private equity				
	Private equity - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes			
	☐ We incorporate ESG into our external manager selection process			
	☑ We invest only in pooled funds and external manager appointment is not applicable			
	☐ We incorporate ESG into our external manager monitoring process			
	☐ We do not do ESG incorporation			



Property			
Froperty	Property - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes		
	☐ We incorporate ESG into our external manager selection process		
	☐ We incorporate ESG into our external manager appointment process		
	☐ We invest only in pooled funds and external manager appointment is not applicable		
	☑ We incorporate ESG into our external manager monitoring process		
	☐ We do not do ESG incorporation		
Money market instruments			
	Money market instruments - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes		
	☑ We incorporate ESG into our external manager selection process		
	\square We incorporate ESG into our external manager appointment process		
	☐ We incorporate ESG into our external manager monitoring process		
	☐ We do not do ESG incorporation		
Other (1)			
	Other (1) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes		
	☐ We incorporate ESG into our external manager selection process		
	☑ We invest only in pooled funds and external manager appointment is not applicable		
	☐ We incorporate ESG into our external manager monitoring process		
	☐ We do not do ESG incorporation		

00 11.4

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

00 11.5

For your externally managed pooled funds, describe any mechanisms in place to set expectations as part of the appointment or commitment process.

00 1	2	Mar	ndatory	Public	Gateway	General
			Delay are all applicable modules as	r agatiana yay may	ranart an Thaga which are mane	datamy to
	00.12	1	Below are all applicable modules or report (asset classes representing a			The second secon

Those which are voluntary to report on can be opted into by ticking the box.



Core modules ☑ Organisational Overview RI implementation directly or via service providers ☑ Engagements ☑ (Proxy) voting RI implementation via external managers Indirect - Selection, Appointment and Monitoring of External Managers ☑ Listed Equities ☑ Fixed income - SSA ☐ Fixed income - Corporate (financial) ☑ Fixed income - Corporate (non-financial) ☐ Private Equity ☐ Property Closing module ☑ Closing module

00 12.2

Additional information. [Optional



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Strategy and Governance

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Investment policy

SG 01 Mandatory Public Core Assessed General

New selection options have been added to this indicator. Please review your prefilled responses carefully.

SG 01.1

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

Yes

SG 01.2

Indicate the components/types and coverage of your policy.

Select all that apply

Policy components/types	Coverage by AUM
☑ Policy setting out your overall approach	Applicable policies cover all AUM
	O Applicable policies cover a majority of AUM
	O Applicable policies cover a minority of AUM
☑ Formalised guidelines on corporate governance factors	
☑ Fiduciary (or equivalent) duties	
☑ Asset class-specific RI guidelines	
☑ Sector specific RI guidelines	
☑ Screening / exclusions policy	
☐ (Proxy) voting policy	
☐ Other, specify (1)	
☐ Other, specify(2)	



SG 01.3	Indicate if the investment policy covers any of the following		
	anisation's definition of ESG and/or responsible investment and it's relation to investments		
	estment objectives that take ESG factors/real economy influence into account		
☑ Time hori	izon of your investment		
☑ Governar	nce structure of organisational ESG responsibilities		
☑ ESG inco	prporation approaches		
☑ Active ow	nership approaches		
☑ Reporting			
☑ Climate of the control of the	change		
☑ Understa	nding and incorporating client / beneficiary sustainability preferences		
☐ Other RI	☐ Other RI considerations, specify (1)		
☐ Other RI	☐ 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.		

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]

 $\bigcirc \ \mathsf{No}$

SG 02 Mandatory Public Core Assessed PRI 6

New selection options have been added to this indicator. Please review your prefilled responses carefully.

SG 02.1

Indicate which of your investment policy documents (if any) are publicly available. Provide a URL and an attachment of the document.

 $\ensuremath{\square}$ Policy setting out your overall approach

URL/Attachment

☑ URL



URL

https://www.fondopensioneintesasanpaolo.it/pdf/LINEE-GUIDA in-vigore-dal-27032018.pdf

☐ Attachment (will be made public)
□ Formalised guidelines on environmental factors
☐ Formalised guidelines on social factors
☐ Formalised guidelines on corporate governance factors
☐ Fiduciary (or equivalent) duties
☐ Asset class-specific RI guidelines
□ Sector specific RI guidelines
□ Screening / exclusions policy
□ Engagement 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
☑ URL
URL
https://www.fondononoignoigtocooppoolo.it/pdf// INEE CLUDA in vigore del 27022019 pdf
https://www.fondopensioneintesasanpaolo.it/pdf/LINEE-GUIDA in-vigore-dal-27032018.pdf
☐ Attachment
☐ 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
☐ We do not publicly disclose any investment policy components
SG 02.3 Additional information [Optional].

SG 03 Mandatory F	Public Core A	Assessed General
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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.

Il Fondo vigila che le operazioni poste in essere dai gestori finanziari siano realizzate nell'esclusivo interesse degli aderenti e vincola contrattualmente i gestori medesimi alla puntuale segnalazione di ogni transazione avente per oggetto strumenti in potenziale conflitto di interesse. Il Fondo verifica che i gestori adempiano correttamente i propri obblighi comunicativi e, al contempo, segnala in modo sistematico all'Autorità di Vigilanza (COVIP) eventuali operazioni in conflitto. Il Fondo vigila altresì sulle situazioni di conflitto di interessi, anche solo potenziali, che si possono verificare nei diversi contesti operativi in cui si sostanzia la gestione dell'Ente. A tale fine gli esponenti e i dipendenti del Fondo, qualora vengano a conoscenza di una situazione di conflitto di interessi, sono tenuti a comunicarla al Fondo. I componenti degli Organi di Amministrazione e Controllo sono altresì tenuti a comunicare eventuali interessi in relazione alle operazioni che devono essere poste in essere dal Fondo e devono astenersi dalle decisioni che la riguardano. Il Fondo è tenuto a comunicare a COVIP le predette situazioni ogni qualvolta le stesse possano influenzare la corretta gestione dell'Ente.

 \bigcirc No

SG 05 Mandatory Public Gateway/Core Assessed General

SG 05.1

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

O Quarterly or more frequently

Objectives and strategies

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

Governance and human resources

SG 07 Mandatory Public 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
☑ B	oard m	nembers or trustees
	☑ Ove	ersight/accountability for responsible investment
	☑ Imp	plementation of responsible investment
	-	oversight/accountability or implementation responsibility for responsible investment
☑ Ir		Roles (triggers other options)
		Select from the below internal roles
		ief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), tment Committee
	☑ Oth	ner Chief-level staff or head of department, specify
	Ger	neral Manager and Deputy Manager
	<u> </u>	☑ Oversight/accountability for responsible investment
		☐ Implementation of responsible investment
		☐ No oversight/accountability or implementation responsibility for responsible investment
	☑ Por	rtfolio managers
	<u> </u>	☑ Oversight/accountability for responsible investment
	5	☑ Implementation of responsible investment
		☐ No oversight/accountability or implementation responsibility for responsible investment
	□ Inv	restment analysts
	□ Ded	dicated responsible investment staff
	□ Inv	restor relations
	□ Oth	ner role, specify (1)
	□ Oth	ner role, specify (2)
✓E	xternal	I managers or service providers
	☑ Ove	ersight/accountability for responsible investment
		plementation of responsible investment
		oversight/accountability or implementation responsibility for responsible investment
SG 07.	.3	Indicate the number of dedicated responsible investment staff your organisation has.
		Number
2		
Promo	oting I	responsible investment
	Mano	datory Public Core Assessed PRI 4,5
SG 09.	.1	Select the collaborative organisation and/or initiatives of which your organisation is a member or in which it participated during the reporting year, and the role you played



which it participated during the reporting year, and the role you played.

SG 09

Select all that apply

	Your organisation's role in the initiative during the reporting period (see definitions)
☑ Basic	
☐ Moder	ate
☐ Advan	ced
	Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
☐ Asian Corpora	ate Governance Association
☐ Australian Co	uncil of Superannuation Investors
☐ AVCA: Sustai	nability Committee
☐ France Invest	- La Commission ESG
□ BVCA – Resp	onsible Investment Advisory Board
☑ CDP Climate	Change
	Your organisation's role in the initiative during the reporting period (see definitions)
☑ Basic	
☐ Moder	ate
☐ Advan	ced
☐ CDP Forests	
☐ CDP Water	
☐ CFA Institute	Centre for Financial Market Integrity
	n 100+
	Your organisation's role in the initiative during the reporting period (see definitions)
☑ Basic	
☐ Moder	ate
☐ Advan	ced



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

supporter

No			
○ Yes			
SG 10.1 Indicate if your organisation promo initiatives.	otes responsible inve	estment, independently of c	ollaborative
Mandatory	Public	Core Assessed	PRI 4
			P.21.4
☐ Other collaborative organisation/initiative, spec			
☐ Other collaborative organisation/initiative, spec	-		
☐ Other collaborative organisation/initiative, spec			
☐ Other collaborative organisation/initiative, spec	cifv		
☐ United Nations Global Compact	(0.12.	,	
☐ United Nations Environmental Program Finance	,	=[)	
□ Shareholder Association for Research and Edu			
☐ Responsible Finance Principles in Inclusive Fir		o, . to tti t, tti v t, opooliy	
☐ Regional or National Social Investment Forums	s (e.a. UKSIF Furo	sif, ASRIA, RIAA), specify	
□ Principles for Sustainable Insurance	,		
□ Principles for Financial Action in the 21st Centr	urv		
☐ Local Authority Pension Fund Forum			
☐ Investor Network on Climate Risk (INCR)/CER	•		
☐ International Integrated Reporting Council (IIR)		7)	
☐ Investor Group on Climate Change, Australia/N	•		
☐ International Corporate Governance Network (,		
☐ Interfaith Center on Corporate Responsibility (I			
☐ HKVCA: ESG Committee☐ Institutional Investors Group on Climate Change	re (IICCC)		
☐ Green Bond Principles			
☐ Global Real Estate Sustainability Benchmark (GKESB)		
☐ Global Impact Investing Network (GIIN)	CDESD)		
☐ Global Investors Governance Network (GIGN)			
☐ Invest Europe Responsible Investment Roundt			
☐ ESG Research Australia			
☐ Extractive Industries Transparency Initiative (E	:111)		
□ Eumedion			
☐ Council of Institutional Investors (CII)			
☐ Code for Responsible Investment in SA (CRIS.	A)		



Outsourcing to fiduciary managers and investment consultants

SG 12 Mandatory Public Core Assessed PRI 4

New selection options have been added to this indicator. Please review your prefilled responses carefully.

SG 12.1 Indicate whether your organisation uses investment consultants.

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

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

Asset class

- ☑ Listed Equity (LE)
- ☑ Fixed income SSA
- ☑ Fixed income Corporate (non-financial)
- ☐ Other asset classes
- ☑ We use investment consultants in our monitoring of external managers

Asset class

- ☑ Listed Equity (LE)
- ☑ Fixed income SSA
- ☑ Fixed income Corporate (non-financial)
- ☐ 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.
- \square 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.
- \Box We do not consider responsible investment in the selection, appointment and/or review processes for investment consultants.



	SG 12.4		dicate whether you use investment consultants for any the following services. Describe the sponsible investment components of these services.		
	☐ Custo	odial ser	vices		
	✓ Inves	stment po	plicy development		
			Describe how responsible investment is incorporated		
	perio	dical rev	iew		
		egic ass	et allocation		
		Strategic asset allocation Describe how responsible investment is incorporated ESG benchmark Investment research Describe how responsible investment is incorporated new ESG sub fund Other, specify (1) Other, specify (2) Other, specify (3) None of the above o, we do not use investment consultants. Indicate whether your organisation considers any of the following responsible investment factors in the monitoring of fiduciary managers cluding responsible investment as a standard agenda item at performance review meetings iscussing whether the fiduciary manager has acted in accordance with your organisation's overall investment afs/ strategy/ policy on responsible investment and ESG factors			
			Describe how responsible investment is incorporated		
	ESG	benchm	ark		
	☑ Inves	stment re	esearch		
			Describe how reaponable investment is incorporated		
			Describe now responsible investment is incorporated		
	new E	ESG sub	fund		
	☐ Other	r, specify	<i>(</i> (1)		
	☐ Other	r, specify	(2)		
	☐ Other	r, specify	7 (3)		
	☐ None	of the a	bove		
	No, we do	not use	investment consultants.		
80	12.5	Indicat	e whether your organisation considers any of the following responsible investment factors in		
36	12.5	the mo	nitoring of fiduciary managers		
	Including r	responsi	ble investment as a standard agenda item at performance review meetings		
	Reviewing	the fidu	ciary manager's PRI Transparency or Assessment reports		
	Reviewing	the fidu	ciary manager's responsible investment reporting (excluding PRI generated reports)		
	Reviewing	g ESG ch	naracteristics/factors used by the fiduciary manager in portfolio construction		
	Reviewing	the fidu	ciary manager's incorporation approaches of ESG through-out asset classes		
	Reviewing	the imp	act of ESG factors on financial performance		
☑ pa	Encouragi rticipate in	ing your education	fiduciary managers to consider joining responsible investment initiatives/organisations or onal or collaborative projects with other investors		
	Including r	responsi	ble investment criteria as a formal component of overall manager performance evaluation		
	Reviewing	the fidu	ciary manger's ESG incorporation in external managers' selection, appointment, monitoring		
\checkmark	Reviewing	how ES	G materiality is defined by the fiduciary manager		
	Other gen	eral asp	ects of your monitoring; specify		
	We do not	t conside	er responsible investment in the monitoring processes for fiduciary managers.		

ESG issues in asset allocation



SG 1	3	Manda	itory		Public	Descriptive	PRI 1
						o analysis and/or modelling, and i set class, sector, strategic asset a	
	☐ Yes	s, in orde	to assess future ESG factor to assess future climate-re nisation does not currently o	lated ri			
	Asse	t class i	mplementation not repo	orted i	n other module	es	
SG 1	7	Manda	itory		Public	Descriptive	General
	SG 17	.1 8		to be d	eveloped or for wi	r managed assets for which a specifich you are not required to report	
Ass	set Class	5			ribe what proces omes achieved	ses are in place and the output	s or
Fixe	ed incom	e - Corpo	rate (financial)				
Priv	rate equi	ty					
Pro	perty						
Мо	ney marl	ket instru	ments				
	er (1) [as erview me		in Organisational				
	SG 17	.2 /	Additional information.				
	Com	municat	ion				
SG 1	9	Manda	atory		Public	Core Assessed	PRI 2, 6



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?

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

Disclosure to clients/beneficiaries
Disclosure to clients/beneficiaries
☑ How responsible investment considerations are included in manager selection, appointment and monitoring processes
☐ Details of the responsible investment activities carried out by managers on your behalf
$\hfill\Box$ E, S and/or G impacts and outcomes that have resulted from your managers' investments and/or active ownership
□ Other
Frequency
☐ Quarterly or more frequently
☐ Biannually
☑ Annually
☐ Less frequently than annually
☐ Ad-hoc/when requested

Listed equity - Engagement

Do you disclose?

- $\ensuremath{\bigcirc}$ We do not disclose to either clients/beneficiaries or the public.
- $\ \bigcirc$ 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
\square 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
Frequency
☐ Quarterly or more frequently
□ Biannually
☑ Annually
☐ Less frequently than annually
☐ Ad-hoc/when requested
URL
https://www.group.intesasanpaolo.com/scriptlsir0/si09/sostenibilita/ita_csr_unit.jsp
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
SG 19.2 Additional information [Optional]



Fondo Pensione Gruppo Intesa Sanpaolo

Reported Information

Public version

Indirect – Manager Selection, Appointment and Monitoring

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Liste	d Equ	ity and F	ixed Incor	ne Strategies							
)1	Man	datory			Public		Gateway	Р			
SAM	01.1	to imple	which of the ment on you investment	ır behalf for all y	incorporat our listed (ion s equit	trategies you require your ext y and/or fixed income assets:	ernal mana			
Ac	tive in	vestment	strategies	Listed Equity	FI - SS	A	FI - Corporate (non-financ	ial)			
Sc	reening			\checkmark	V						
Th	ematic										
Int	egratior	1									
No	one of th	e above									
		Passiv	e investmer	nt strategies							
			Passive ii	nvestment strat	egies	FI -	SSA				
			Screening			V					
			Thematic								
Integration			1								
			None of th	e above							
Sele	ction										

Principles for Responsible Investment

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

SAM 02.1

	LE	FI - SSA	FI - Corporate (non- financial)		
Your organisation's investment strategy and how ESG objectives relate to it	V	V	✓		
ESG incorporation requirements					
ESG reporting requirements	V	V			
Other					
No RI information covered in the selection documentation					

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 (non- financial)	
Assess the time horizon of the investment manager's offering vs. your/beneficiaries' requirements	V	V		
Assess the quality of investment policy and its reference to ESG	\checkmark	V		
Assess the investment approach and how ESG objectives are implemented in the investment process	V	V		
Review the manager's firm-level vs. product-level approach to RI				
Assess the ESG definitions to be used				
Other				
None of the above				

ESG people/oversight



	LE	FI - SSA	FI - Corporate (non- financial)
Assess ESG expertise of investment teams			
Review the oversight and responsibilities of ESG implementation			
Review how is ESG implementation enforced /ensured	V	$\overline{\checkmark}$	
Review the manager's RI-promotion efforts and engagement with the industry			
Other			
None of the above			

Process/portfolio construction/investment valuation



		SSA		financial)
Review the process for ensuring the quality of the ESG data used				
Review and agree the use of ESG data in the investment decision making process	V	V		
Review and agree the impact of ESG analysis on investment decisions	t 🗸	V		
Review and agree ESG objectives (e.g. risk reduction, return seeking, real-world impact)	I 🗹	V		
Review and agree manager's ESG risk framework				
Review and agree ESG risk limits at athe portfolio level (portfolio construction) and other ESG objectives				
Review how ESG materiality is evaluated by the manager	\checkmark	V		
Review process for defining and communicating on ESG incidents				
Review and agree ESG reporting frequency and detail				
Other, specify				
None of the above				
SAM 02.3 Indicate the selection process and its ES	SG/RI co	omponent	s	
☐ Review ESG/RI responses to RfP, RfI, DDQ etc.				
☐ Review responses to PRI's Limited Partners` Respon	nsible Ir	nvestment	t Di	ue Diligence Questionnaire (LP DD)
\ensuremath{ert} Review publicly available information on ESG/RI				
$\ensuremath{\square}$ Review assurance process on ESG/RI data and proc	cesses			
☐ Review PRI Transparency Reports				
$\hfill\square$ Request and discuss PRI Assessment Reports				
$\hfill\square$ Meetings with the potential shortlisted managers cov	ering E	SG/RI the	me	es
☐ Site visits to potential managers offices				
☐ Other, specify				



	LE	FI - SSA	FI - Corporate (non-financial)		
ESG performance development targets	\checkmark	$\overline{\checkmark}$	abla		
ESG score	\checkmark	V			
ESG weight					
Real world economy targets	\checkmark	\checkmark			
Other RI considerations					
None of the above					

	Monit	toring						
SAM 05		Mar	ndatory	Public	Core Assessed	PRI 1		
SAM 05.1		5.1	When monitoring managers, indicat information your organisation typica			nent		

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

SAM 05.2

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



	LE	FI - SSA	FI - Corporate (non-financial)		
ESG score	V	\checkmark			
ESG weight					
ESG performance minimum threshold					
Real world economy targets					
Other RI considerations					
None of the above					

	Outp	uts ar	nd outcomes			
SAM	09	Man	ndatory	Public	Additional Assessed	PRI 1,6
	SAM 0	9.1	Provide examples of how ESG issuand/or monitoring process for your o			appointment
	□ Add	d Exam	nple 1			
	□ Add	l Exam	nple 2			
	□ Add	l Exam	nple 3			
	□ Add	d Exam	nple 4			
	□ Add	d Exam	nple 5			
	□ Add	d Exam	nple 6			
	□ Add	d Exam	nple 7			
	☑ We	are no	ot able to provide examples			

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Direct - Listed Equity Active Ownership

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Overview

LEA 01 Mandatory Public Core Assessed PRI 2

New selection options have been added to this indicator. Please review your prefilled responses carefully.

LEA 01.1

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

Yes

LEA 01.2

Attach or provide a URL to your active ownership policy.

- O Attachment provided:
- URL provided:

URL

https://www.fondopensioneintesasanpaolo.it

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
- ☑ Engagement approach



	Engagement					
	☑ ESG issues					
	☑ Prioritisation of engagement					
	☑ Transparency of engagement activities					
	☑ Due diligence and monitoring process					
	☑ Insider information					
	☑ Escalation strategies					
	☑ Service Provider specific criteria					
	☐ Other; (specify)					
□ (P	roxy) voting approach					
□ Ot	her					
□ No	one of the above					
○ No						
LEA 01.4	Do you outsource any of your active ownership activities to service providers?					
○ Yes						
No						
LEA 01.6	Additional information [optional]					

Engagement						
LEA 02	Mar	ndatory	Public	Core Assessed	PRI 1,2,3	
LEA (2.1	Indicate the method of engagement	t, giving reasons fo	r 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
	\square 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
	\square To gain an understanding of ESG strategy and/or management
	☑ We do not engage via service providers

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

New selection options have been added to this indicator. Please review your prefilled responses carefully.

LEA 03.1

Indicate whether your organisation has a formal process for identifying and prioritising engagements.

○ Yes

No

LEA 04	Mandatory	Public	Core Assessed	PRI 2
--------	-----------	--------	---------------	-------

New selection options have been added to this indicator. Please review your prefilled responses carefully.

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

LEA 05 Mandatory Public Core Assessed PRI 2

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.

LEA 05.3 Additional information. [Optional

LEA 06 Mandatory Public Additional Assessed PRI 2,4

LEA 06.1

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

○ Yes

No

LEA 08 Mandatory Public 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	Yes, we track the number of our engagements in fullYes, we partially track the number of our engagementsWe 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

(Proxy) voting and shareholder resolutions

LEA 12 Mandatory Public Descriptive PRI 2

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

Approach

- O 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

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

LEA 15 Mandatory Public Descriptive PRI 2

LEA 15.1

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

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

LEA 16 Mandatory Public Core Assessed PRI 2

LEA 16	communicated the rationale to	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.							
O 100	%								
○ 99-7	75%								
○ 74-5	50%								
○ 49-2	25%								
O 24-1	%								
○ We	do not communicate the rationale to co	mpanies							
	applicable because we and/or our serv mendations	ice providers did not ab	stain or vote against managemer	nt					
LEA 17	Mandatory	Public	Core Assessed	PRI 2					
LEA 17	For listed equities in which you instructions, indicate the percer		er have the mandate to issue (pro ng the reporting year.	xy) voting					
○ We	do track or collect this information								
We	do not track or collect this information								
LEA 17	Explain your reason(s) for not v	oting on certain holding	gs						
☐ Sha	res were blocked								
☐ Noti	ce, ballots or materials not received on	time							
☐ Miss	sed deadline								
□ Coo	graphical restrictions (non-home marke	☐ Geographical restrictions (non-home market)							
	□ Cost								
	t	et)							
□ Cos	t flicts of interest	91)							
□ Cos ☑ Con		2()							
□ Cos ☑ Con □ Hold	flicts of interest dings deemed too small ninistrative impediments (e.g., power of		ineligibility due to participation in	share					
□ Cos ☑ Con □ Hold □ Adm placem	flicts of interest dings deemed too small ninistrative impediments (e.g., power of		ineligibility due to participation in	share					
☐ Cos ☑ Con ☐ Hold ☐ Adm placem ☐ Clie	flicts of interest dings deemed too small ninistrative impediments (e.g., power of nent)		ineligibility due to participation in	share					
☐ Cos ☑ Con ☐ Hold ☐ Adm placem ☐ Clie	flicts of interest dings deemed too small ninistrative impediments (e.g., power of nent) nt request		ineligibility due to participation in	share					

Indicate whether your organisation has a formal escalation strategy following unsuccessful voting.

○ Yes

LEA 19.1

No



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Confidence building measures

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Conf	idence building measures	6			
CM1 01	Mandatory		Public	Additional Assessed	General
CM1 (year has undergone:		nation you have pro	ovided for your PRI Transparenc	y Report this
☐ Thi	rd party assurance over select	ted responses	from this year's PF	RI Transparency Report	
	rd party assurance over data p nses this year	points from oth	ner sources that have	ve subsequently been used in yo	ur PRI
	rd party assurance or audit of is year)	the correct im	plementation of RI	processes (that have been repor	ted to the
	ernal audit of the correct imple ed to the PRI this year)	mentation of R	RI processes and/or	r accuracy of RI data (that have b	een
☑ Inte	ernal verification of responses	before submis	ssion to the PRI (e.	g. by the CEO or the board)	
(Whole PRI Transparency Re	eport has beer	n internally verified		
	Selected data has been inte	rnally verified			
	ner, specify				
□ No	ne of the above				
CM1 02	Mandatory		Public	Descriptive	General
CM1 (We undertook third p	arty assurance	e on last year's PRI	Transparency Report	
O Wh	ole PRI Transparency Report	was assured I	ast year		
○ Sel	ected data was assured in las	t year's PRI T	ransparency Repor	t	
• We	did not assure last year's PR	I Transparenc	y report		
○ No	ne of the above, we were in ou	ur preparation	year and did not re	port last year.	
CM1 03	Mandatory		Public	Descriptive	General
CM1 (We undertake confidence Transparency Report		measures that are (unspecific to the data contained i	n our PRI
□We	adhere to an RI certification of	or labelling sch	neme		
	carry out independent/third patts of which are included in this			ic report (such as a sustainability t	report)
□ES	G audit of holdings				
□ Oth	ner, specify				
☑ No	ne of the above				
CM1 04	Mandatory		Public	Descriptive	General



O Wh	ole PR	I Transparency Report will be assured	d			
○ Sel	ected o	data will be assured				
• We	do no	t plan to assure this year`s PRI Transp	parency repor	rt		
07 Mai		datory	Public	Descriptive	General	
CM1 (internally the whole - or selected data of the - PRI Transparency ted data please specify what data was reviewed		
Who	has co	nducted the verification				
□СЕ	O or ot	ther Chief-Level staff				
□ The	e Board	b				
□ Inv	estmer	nt Committee				
□ Со	mplian	ce Function				
□ RI/	ESG T	eam				
□ Inv	estmer	nt Teams				
□ Le(gal Dep	partment				
✓ Oth	ner (spe	ecify)				
		.,				
		specify				
adr	ninistra	ation role				
		What data has been verified				
[-	☑ Polic	ies				
☐ Overarching strategy and processes						
☑ Asset class specific processes						
☑ Quantitative data related to RI processes						
	☐ Othe	r				
		Relevant modules				
[☑ Orga	nisational Overview				
[☑ Strategy and Governance					

Do you plan to conduct third party assurance of this year's PRI Transparency report?



☑ Indirect – Manager Selection, Appointment and Monitoring

 $\ oxdot$ Direct - Listed Equity Active Ownership

CM1 04.1