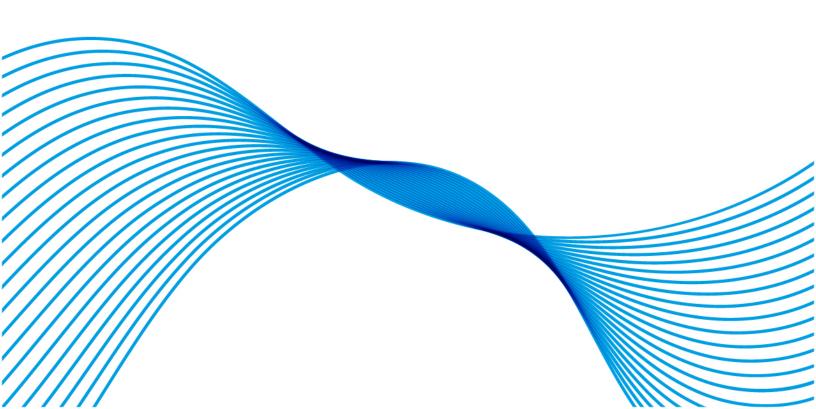
# **PRI** Principles for Responsible Investment

# PUBLIC TRANSPARENCY REPORT

2024

# **United Bankers Ltd**

Generated 25-11-2024



# About this report

PRI reporting is the largest global reporting project on responsible investment. It was developed with investors, for investors.

PRI signatories are required to report publicly on their responsible investment activities each year. In turn, they receive a number of outputs, including a public and private Transparency Report.

The public Transparency Reports, which are produced using signatories' reported information, provide accountability and support signatories to have internal discussions about their practices and to discuss these with their clients, beneficiaries, and other stakeholders.

This public Transparency Report is an export of the signatory's responses to the PRI Reporting Framework during the 2024 reporting period. It includes the signatory's responses to core indicators, as well as responses to plus indicators that the signatory has agreed to make public.

In response to signatory feedback, the PRI has not summarised signatories' responses – the information in this document is presented exactly as it was reported.

For each of the indicators in this document, all options selected by the signatory are presented, including links and qualitative responses. In some indicators, all applicable options are included for additional context.

# Disclaimers

# Legal Context

PRI recognises that the laws and regulations to which signatories are subject differ by jurisdiction. We do not seek or require any signatory to take an action that is not in compliance with applicable laws. All signatory responses should therefore be understood to be subject to and informed by the legal and regulatory context in which the signatory operates.

# **Responsible investment definitions**

Within the PRI Reporting Framework Glossary, we provide definitions for key terms to guide reporting on responsible investment practices in the Reporting Framework. These definitions may differ from those used or proposed by other authorities and regulatory bodies due to evolving industry perspectives and changing legislative landscapes. Users of this report should be aware of these variations, as they may impact interpretations of the information provided.

# Data accuracy

This document presents information reported directly by signatories in the 2024 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented. The PRI has taken reasonable action to ensure that data submitted by signatories in the reporting tool is reflected in their official PRI reports accurately. However, it is possible e that small data inaccuracies and/or gaps remain, and the PRI shall not be responsible or liable for such inaccuracies and gaps.

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# **SENIOR LEADERSHIP STATEMENT (SLS)**

# SENIOR LEADERSHIP STATEMENT

## SENIOR LEADERSHIP STATEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1	CORE	N/A	N/A	PUBLIC	Senior Leadership Statement	GENERAL

### Section 1. Our commitment

Why does your organisation engage in responsible investment?

• What is your organisation's overall approach to responsible investment, and what major responsible investment commitment(s) have you made?

The primary objective of investment management activities at United Bankers is to achieve – in a responsible manner – the best possible return at the level of risk chosen by its clients, both in the long and in the short term. As part of this objective, we consider how environmental, social and governance (ESG) factors affect companies and securities we invest in, and what kind of environmental and social impacts our investments have. We believe that focusing on sustainability will have a positive effect on investment returns, and that offering an increasingly sustainability focused product portfolio will add value to both our customers and United Bankers' shareholders. Integrating the responsibility aspect into United Bankers' products and services is, in our view, an integral part of the group's overall risk management.

Our aim is to reduce the negative climate impact of our investments and to increase the positive sustainability impact of our investments in the long term - these goals have been further detailed in United Bankers' sustainability framework and program as well as United Bankers' climate roadmap. In the climate roadmap United Bankers has committed to setting science-based emission reduction targets in line with the Science Based Targets initiative by 2025, and reducing greenhouse gas emissions of investment portfolios while increasing their carbon sequestration.

We have integrated the responsibility perspective into all our investment activities.

These considerations are taken into account in portfolio management of investment funds, discretionary asset management as well as other investment solutions we provide. United Bankers' Responsible Principles for Responsible Investment summarize our approach to responsible investment, and our commitments. These principles are approved by United Bankers Board of Directors, and updated regularly. United Bankers is committed to respecting human rights in line with UNGP, and reporting upon climate risks based on the TCFD framework. As PRI signatory since 2012, United Bankers also strives to promote responsible investment in our networks, and with our stakeholders. United Bankers also works actively in the Sustainability Committees of Finance Finland and the Finnish Venture Capital Association, among others, United Bankers is an active member of Sustainable Investment Finland, and participates in joint stewardship activities such as the CDP Non-Disclosure Campaign together with other investors.

### Section 2. Annual overview

Discuss your organisation's progress during the reporting year on the responsible investment issue you consider most relevant or material to your organisation or its assets.

Reflect on your performance with respect to your organisation's responsible investment objectives and targets during the reporting year. Details might include, for example, outlining your single most important achievement or describing your general progress on topics such as the following (where applicable):

- · refinement of ESG analysis and incorporation
- stewardship activities with investees and/or with policymakers
- collaborative engagements
- · attainment of responsible investment certifications and/or awards



In 2023 United Bankers advanced responsible investment in several ways.

Strategy and Principles: Sustainability and responsible investment are at the center of United Bankers' growth strategy. In 2023, United Bankers established its climate roadmap, and committed to setting emission reduction targets in line with the Science Based Targets initiative. The integration of United Bankers' human rights related considerations into responsible investing and United Bankers' activities as a whole were continued during 2023.

United Bankers requires that the operations of its business partners, such as service providers and suppliers, comply with United Bankers' sustainability standards. The principles and requirements are set out in the Supplier Code of Conduct that was introduced in 2023. United Bankers also published its ownership policy which outlines the manner in which ownership policy is being implemented, and how the policy is applied to the funds managed by United Bankers Asset Management Ltd and United Bankers Fund Management Company Ltd.

Organization: In 2023, United Bankers published its sustainability focus areas that were specified through a materiality analysis. The aim of the focus areas is to ensure that sustainability work and targets meet stakeholder expectations and focus on topics that are material to the company. Each focus area has different targets and indicators, the progress of which is monitored in the United Bankers' sustainability reporting. The attainment of sustainability goals is also increasingly linked to the company's remuneration policy and practices.

Reporting: In 2023, United Bankers published its principles for identification and consideration of the Principal Adverse Impacts (PAI) of investments in line with the EU SFDR. United Bankers reported the information on the PAI of its investments for the first time in 2023. In 2023, United Bankers further improved quarterly ESG reports for all United Bankers investment funds and SFDR 8 wealth management products. United Bankers published its sustainability focus areas and described the related targets in its holistic sustainability report based on the principles of the Global Reporting Initiative (GRI) in addition to PRI recommendations.

Stakeholders: In 2023, United Bankers' customer satisfaction improved to a very high level. The results improved among both retail and institutional clients.

United Bankers received Finland's Most Inspiring Workplace 2023 award. The PeoplePower index, which measures personnel commitment, continued to develop in a positive direction. United Bankers continued its work in the sustainability committees of Finance Finland and the Finnish Venture Capital Association. United Bankers' UNGP-compliant whistleblowing channel was opened in 2023.

Climate: United Bankers published its climate targets in 2023 as part of the United Bankers climate roadmap.

United Bankers invests in low-carbon and carbon sequestration solutions and aims to increase the carbon sequestration of its investments to exceed the greenhouse gas emissions of its investments by 2030. This will ensure that United Bankers' operations are aligned with the objectives of the Paris Climate Agreement and support United Bankers in achieving its long-term Net Zero targets by 2040-2050. The carbon footprint of United Bankers' investment products decreased by 7% and the company's total net emissions halved year-on-year. United Bankers funds continued proxy voting based on ISS International Sustainability Voting Guidelines, in order to push for climate- and other sustainability themes in their investments. In addition, United Bankers continued to participate in the CDP Non-Disclosure Campaign.

ESG data: In 2023, United Bankers made use of physical climate risk data from a specified data provider to quantify United Bankers' fixed income and equity funds' exposure to physical climate risks.

The results presented the percentage of economic value of facilities exposed to floods, droughts, wildfires, sea level rise, and similar risks. United Bankers expanded the use of Sustainalytics ESG-data in portfolio management by making more datasets available directly to portfolio managers to enhance ESG integration.

Products: In 2023, of United Bankers' selection of 25 funds, all were classified either under article 8 or 9 of the SFDR. The sustainability focus of United Bankers' products remains significant, as in 2023 United Bankers launched a new fund UB Renewable Energy that invests in renewable energy development projects and renewable energy power plants.

In 2023, United Bankers also launched a new forest fund that aims at climate change mitigation. UB Nordic Forest Fund IV invests in forest properties and is committed to making sustainable investments aligned with the EU Taxonomy. Additionally, UB Forest Industry Green Growth Fund I LP, which invests in sustainable and resource-efficient forest and bio-based industries, commenced its operations.

#### Section 3. Next steps

What specific steps has your organisation outlined to advance your commitment to responsible investment in the next two years?

We will focus on improving our performance in ESG efforts in number of areas. To address importance of ESG we have set ESG KPIs as part of remuneration programs for portfolio managers and the top management of UB Group. We strive for increased transparency in ESG reporting, improvement in chosen ESG scores and general awareness of ESG issues our work throughout the organization. We will strive to have stringent ESG criteria in all new product launches also from the SFDR and EU taxonomy criteria perspective (where applicable). We will work closely with our chosen key counterparts to be able to reach the targets set in the KPIs. We will set climate targets in line with Science Based Targets initiative (SBTi) by 2025.



### Section 4. Endorsement

'The Senior Leadership Statement has been prepared and/or reviewed by the undersigned and reflects our organisation-wide commitment and approach to responsible investment'.

Name

Patrick Anderson

Position

CEO

Organisation's Name

United Bankers Ltd

### **A**

'This endorsement applies only to the Senior Leadership Statement and should not be considered an endorsement of the information reported by the above-mentioned organisation in the various modules of the Reporting Framework. The Senior Leadership Statement serves as a general overview of the above-mentioned organisation's responsible investment approach. The Senior Leadership Statement does not constitute advice and should not be relied upon as such. Further, it is not a substitute for the skill, judgement and experience of any third parties, their management, employees, advisors and/or clients when making investment and other business decisions'.
B



# **ORGANISATIONAL OVERVIEW (OO)**

# **ORGANISATIONAL INFORMATION**

# **REPORTING YEAR**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 1	CORE	N/A	N/A	PUBLIC	Reporting year	GENERAL
What is the year-end date of the 12-month period you have chosen to report for PRI reporting purposes?						
		Date		Month		Year
	te of the 12-month RI reporting purposes:	31		12		2023

## **SUBSIDIARY INFORMATION**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 2	CORE	N/A	00 2.1	PUBLIC	Subsidiary information	GENERAL

### Does your organisation have subsidiaries?

(A) Yes

• (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 2.1	CORE	00 2	00 2.2	PUBLIC	Subsidiary information	GENERAL

Are any of your organisation's subsidiaries PRI signatories in their own right?

○ (A) Yes○ (B) No



# **ASSETS UNDER MANAGEMENT**

# ALL ASSET CLASSES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle		
OO 4	CORE	00 3	N/A	PUBLIC	All asset classes	GENERAL		
What are your to	What are your total assets under management (AUM) at the end of the reporting year, as indicated in [OO 1]?							
		USD						
including subs excluding the	AUM subject to risory, custody, or	US\$ 5,054,533,26	7.00					
(B) AUM of subsidiaries that are PRI signatories in their own right and excluded from this submission, as indicated in [OO 2.2]		US\$ 0.00						
	ect to execution, ody, or research	US\$ 0.00						



## **ASSET BREAKDOWN**

Indicator	Type of	indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 5	CORE		OO 3	Multiple indicators	PUBLIC	Asset breakdown	GENERAL
Provide a perce	entage brea	kdown of y	our total AUM at t	he end of the repo	rting year as inc	dicated in [OO 1].	
		(1) Perce	ntage of Internally	/ managed AUM	(2) Percentaç	ge of Externally ma	naged AUM
(A) Listed equ	uity	>10-50%			>0-10%		
(B) Fixed inco	ome	>0-10%			>0-10%		
(C) Private ec	quity	>0-10%			>0-10%		
(D) Real esta	te	>10-50%			>0-10%		
(E) Infrastruct	ture	>0-10%			0%		
(F) Hedge fur	nds	0%			0%		
(G) Forestry		>10-50%			0%		
(H) Farmland		0%			0%		
(I) Other		>0-10%			>0-10%		
(J) Off-balanc	e sheet	0%			0%		

(I) Other - (1) Percentage of Internally managed AUM - Specify:

Cash

(I) Other - (2) Percentage of Externally managed AUM - Specify:

Cash



## ASSET BREAKDOWN: EXTERNALLY MANAGED ASSETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.1	CORE	OO 5	Multiple	PUBLIC	Asset breakdown: Externally managed assets	GENERAL

Provide a further breakdown of your organisation's externally managed listed equity and/or fixed income AUM.

	(1) Listed equity	(2) Fixed income - SSA	(3) Fixed income - corporate	(4) Fixed income - securitised	(5) Fixed income - private debt
(A) Active	>75%	0%	0%	0%	>0-10%
(B) Passive	>0-10%	0%	>75%		

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.2	CORE	00 5, 00 5.1	SAM 3, SAM 8	PUBLIC	Asset breakdown: Externally managed assets	GENERAL

Provide a breakdown of your organisation's externally managed AUM between segregated mandates and pooled funds or investments.

	(1) Segregated mandate(s)	(2) Pooled fund(s) or pooled investment(s)
(A) Listed equity - active	0%	>75%
(B) Listed equity - passive	0%	>75%
(C) Fixed income - active	0%	>75%
(D) Fixed income - passive	0%	>75%
(E) Private equity	0%	>75%
(F) Real estate	0%	>75%



# ASSET BREAKDOWN: INTERNALLY MANAGED LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 5.3 LE	CORE	00 5	Multiple	PUBLIC	Asset breakdown: Internally managed listed equity	GENERAL
Provide a furthe	er breakdown of you	r internally manage	ed listed equity	AUM.		
(A) Passive e	quity 0%	)				
(B) Active – q	uantitative >0	-10%				
(C) Active – fu	ındamental >7	5%				
(D) Other stra	tegies 0%	)				

## ASSET BREAKDOWN: INTERNALLY MANAGED FIXED INCOME

Indicator	Type of inc	dicator I	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 FI	CORE	(	00 5	Multiple	PUBLIC	Asset breakdown: Internally managed fixed income	GENERAL
Provide a furthe	r breakdown	of your int	ernally managed	d fixed income	AUM.		
(A) Passive –	SSA	0%					
(B) Passive –	corporate	>10-50%					
(C) Active – S	SA	0%					
(D) Active – co	orporate	>50-75%					
(E) Securitised	1	>10-50%					
(F) Private det	ot	>10-50%					



## ASSET BREAKDOWN: INTERNALLY MANAGED PRIVATE EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 PE	CORE	00 5	N/A	PUBLIC	Asset breakdown: Internally managed private equity	GENERAL
Provide a furtl	her breakdown of your	internally manage	d private equit	y AUM.		
(A) Venture	capital	0%				
(B) Growth c	(B) Growth capital					
(C) (Leveraç	ged) buy-out	0%				
(D) Distress special situa	ed, turnaround or ttions	0%				
(E) Seconda	aries	0%				
(F) Other		0%				

### ASSET BREAKDOWN: INTERNALLY MANAGED REAL ESTATE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 5.3 RE	CORE	OO 5	N/A	PUBLIC	Asset breakdown: Internally managed real estate	GENERAL

Provide a further breakdown of your internally managed real estate AUM.

(A) Retail	>10-50%
(B) Office	>10-50%
(C) Industrial	>10-50%
(D) Residential	>0-10%
(E) Hotel	>0-10%



(F) Lodging, leisure and recreation	0%
(G) Education	>0-10%
(H) Technology or science	0%
(I) Healthcare	>0-10%
(J) Mixed use	>0-10%
(K) Other	>0-10%
(K) Other - Specify:	

Miscellaneous

# ASSET BREAKDOWN: INTERNALLY MANAGED INFRASTRUCTURE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 5.3 INF	CORE	00 5	N/A	PUBLIC	Asset breakdown: Internally managed infrastructure	GENERAL
Provide a furth	er breakdown of your i	internally manage	d infrastructure	e AUM.		
(A) Data infra	structure	0%				
(B) Diversified	d	0%				
(C) Energy ar	nd water resources	0%				
(D) Environm	ental services	0%				
(E) Network u	utilities	0%				
(F) Power ger renewables)	neration (excl.	0%				
(G) Renewab	le power	>10-50%				
(H) Social infi	rastructure	0%				
(I) Transport		0%				



(J) Other

### (J) Other - Specify:

Corporate bonds, cash & equivalents, government related.

## MANAGEMENT BY PRI SIGNATORIES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 6	CORE	00 5	N/A	PUBLIC	Management by PRI signatories	GENERAL

What percentage of your organisation's externally managed assets are managed by PRI signatories?

>50-75%

### **GEOGRAPHICAL BREAKDOWN**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 7	CORE	Multiple, see guidance	N/A	PUBLIC	Geographical breakdown	GENERAL

How much of your AUM in each asset class is invested in emerging markets and developing economies?

### AUM in Emerging Markets and Developing Economies

(A) Listed equity	(2) >0 to 10%
(C) Fixed income – corporate	(2) >0 to 10%
(D) Fixed income – securitised	(1) 0%
(E) Fixed income – private debt	(1) 0%
(F) Private equity	(2) >0 to 10%
(G) Real estate	(1) 0%
(H) Infrastructure	(1) 0%



# STEWARDSHIP

### **STEWARDSHIP**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 8	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship	GENERAL

Does your organisation conduct stewardship activities, excluding (proxy) voting, for any of your assets?

	(1) Listed equity - active	(2) Listed equity - passive	(3) Fixed income - active	(4) Fixed income - passive	(5) Private equity
(A) Yes, through internal staff					
(B) Yes, through service providers					
(C) Yes, through external managers					
(D) We do not conduct stewardship	0	0	0	0	0

	(6) Real estate	(7) Infrastructure	(9) Forestry	(11) Other
(A) Yes, through internal staff				
(B) Yes, through service providers				
(C) Yes, through external managers				
(D) We do not conduct stewardship	0	0	0	۲



# **STEWARDSHIP: (PROXY) VOTING**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle	
OO 9	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship: (Proxy) voting	GENERAL	
Does your orga	Does your organisation conduct (proxy) voting activities for any of your listed equity holdings?						
		(1) Listed	equity - active		(2) Listed equity -	passive	
(A) Yes, throu	(A) Yes, through internal staff						
(B) Yes, throu	(B) Yes, through service providers						
(C) Yes, through external managers							
(D) We do no voting	t conduct (proxy)		0		0		

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9.1	CORE	00 9	PGS 10.1, PGS 31	PUBLIC	Stewardship: (Proxy) voting	GENERAL

For each asset class, on what percentage of your listed equity holdings do you have the discretion to vote?

Percentage of your listed equity holdings over which you have the discretion to vote

(A) Listed equity – active	(10) >80 to 90%
(B) Listed equity - passive	(9) >70 to 80%



# **STEWARDSHIP NOT CONDUCTED**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 10	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship not conducted	2

Describe why your organisation does not currently conduct stewardship and/or (proxy) voting.

Stewardship, excluding (proxy) voting

(K) Other

This asset class mainly includes cash, so voting has not been considered relevant.

# **ESG INCORPORATION**

# **INTERNALLY MANAGED ASSETS**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 11	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Internally managed assets	1

For each internally managed asset class, does your organisation incorporate ESG factors, to some extent, into your investment decisions?

	(1) Yes, we incorporate ESG factors into our investment decisions	(2) No, we do not incorporate ESG factors into our investment decisions
(B) Listed equity - active - quantitative	۲	ο
(C) Listed equity - active - fundamental	۲	ο
(F) Fixed income - corporate	۲	0
(G) Fixed income - securitised	۲	ο
(H) Fixed income - private debt	۲	ο
(I) Private equity	۲	ο
(J) Real estate	۲	o



(K) Infrastructure	۲	0
(T) Forestry	۲	0
(V) Other: Cash	0	۲

# **EXTERNAL MANAGER SELECTION**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 12	CORE	00 5, 00 5.1	Multiple indicators	PUBLIC	External manager selection	1

For each externally managed asset class, does your organisation incorporate ESG factors, to some extent, when selecting external investment managers?

	(1) Yes, we incorporate ESG factors when selecting external investment managers	(2) No, we do not incorporate ESG factors when selecting external investment managers
(A) Listed equity - active	۲	o
(B) Listed equity - passive	۲	0
(C) Fixed income - active	۲	0
(D) Fixed income - passive	۲	0
(E) Private equity	۲	0
(F) Real estate	۲	0
(K) Other: Cash	0	۲



## **EXTERNAL MANAGER APPOINTMENT**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 13	CORE	00 5, 00 5.1	Multiple indicators	PUBLIC	External manager appointment	1

For each externally managed asset class, does your organisation incorporate ESG factors, to some extent, when appointing external investment managers?

	(1) Yes, we incorporate ESG factors when appointing external investment managers	(2) No, we do not incorporate ESG factors when appointing external investment managers
(A) Listed equity - active	۲	0
(B) Listed equity - passive	۲	0
(C) Fixed income - active	۲	0
(D) Fixed income - passive	۲	0
(E) Private equity	۲	0
(F) Real estate	۲	0
(K) Other: Cash	0	۲



## **EXTERNAL MANAGER MONITORING**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 14	CORE	00 5, 00 5.1	Multiple indicators	PUBLIC	External manager monitoring	1

For each externally managed asset class, does your organisation incorporate ESG factors, to some extent, when monitoring external investment managers?

	(1) Yes, we incorporate ESG factors when monitoring external investment managers	(2) No, we do not incorporate ESG factors when monitoring external investment managers
(A) Listed equity - active	۲	0
(B) Listed equity - passive	۲	0
(C) Fixed income - active	۲	0
(D) Fixed income - passive	۲	0
(E) Private equity	۲	0
(F) Real estate	۲	0
(K) Other: Cash	0	۲

### **ESG IN OTHER ASSET CLASSES**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 15	CORE	00 11, 00 12– 14	N/A	PUBLIC	ESG in other asset classes	1

Describe how your organisation incorporates ESG factors into the following asset classes.

Internally managed

(A) Forestry

The UB forest funds focusing on forestry make sustainable investments. The objective of the funds is to mitigate climate change through sustainable forestry. Additionally, the timber produced in the fund's forests can also facilitate transition to a circular economy.

The funds invests in timberland and endeavor through timberland investments to absorb carbon dioxide from the atmosphere into tree growth, as well as in sustainable timber products. Furthermore, the use of the timber grown in the forests of the funds can partially replace fossil fuels and fossil-intensive materials.



The objective is to manage the forests as carbon sinks over long term. Sustainable forestry is an effective solution for the removal of carbon from the atmosphere and a vital means for attaining the goals set in the Paris Agreement. The forest management practices of the funds are designed based on 30 year GHG and carbon balance models to ensure carbon capture beyond conventional forest management practices.

The strategy of the funds supports climate change mitigation and promotes several of the UN sustainable development goals, particularly goal 13: Climate action, goal 15: Life on land and goal 9: Industry, innovation and infrastructure. In addition the fund may develop and zone forest properties, utilise the soil materials of the forest properties, as well as their potential recreational values.

The attainment of the sustainability goals of the funds is monitored through regular carbon balance accounting, and the results are included in the periodical reporting of each fund.

The forest management practices of the fund are designed based on 30 year GHG and carbon balance models to ensure carbon capture beyond conventional forest management practices.

The GHG balance calculation, modelling and reporting are conducted in accordance with best international practices that are constantly evolving. The funds report annually, inter alia, the size of the fund's carbon sink, the surface area of FSC and PEFC-certified forests, and areas excluded from economic use, the areas set-aside for different types of forest conservation, and various biodiversity indicators. In addition, the funds monitor and report on biodiversity indicators such as share of broad-leafed trees in the fund's forest.

### **ESG NOT INCORPORATED**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 16	CORE	00 11, 00 12– 14	N/A	PUBLIC	ESG not incorporated	1

Describe why your organisation does not currently incorporate ESG factors into your investment decisions and/or in the selection, appointment and/or monitoring of external investment managers.

Internally managed

(O) Other

"Other" mainly includes cash, so ESG incorporation has not been considered material.

Externally managed

(Z) Other

"Other" mainly includes cash, so ESG incorporation has not been considered material.



# **ESG STRATEGIES**

# LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 17 LE	CORE	00 11	00 17.1 LE, LE 12	PUBLIC	Listed equity	1

Which ESG incorporation approach and/or combination of approaches does your organisation apply to your internally managed active listed equity?

(A) Screening alone	0%
(B) Thematic alone	0%
(C) Integration alone	0%
(D) Screening and integration	>75%
(E) Thematic and integration	0%
(F) Screening and thematic	0%
(G) All three approaches combined	0%
(H) None	0%

### Percentage out of total internally managed active listed equity



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 17.1 LE	CORE	00 17 LE	LE 9	PUBLIC	Listed equity	1

What type of screening does your organisation use for your internally managed active listed equity assets where a screening approach is applied?

	Percentage coverage out of your total listed equity assets where a screening approach is applied
(A) Positive/best-in-class screening only	0%
(B) Negative screening only	0%
(C) A combination of screening approaches	>75%

### **FIXED INCOME**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 17 FI	CORE	OO 5.3 FI, OO 11	Multiple, see guidance	PUBLIC	Fixed income	1

Which ESG incorporation approach and/or combination of approaches does your organisation apply to your internally managed active fixed income?

	(2) Fixed income - corporate	(3) Fixed income - securitised
(A) Screening alone	0%	0%
(B) Thematic alone	0%	0%
(C) Integration alone	0%	0%
(D) Screening and integration	>75%	>75%
(E) Thematic and integration	0%	0%
(F) Screening and thematic	0%	0%



(G) All three approaches combined	0%	0%
(H) None	0%	0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 17.1 FI	CORE	00 17 FI	N/A	PUBLIC	Fixed income	1

What type of screening does your organisation use for your internally managed active fixed income where a screening approach is applied?

	(2) Fixed income - corporate	(3) Fixed income - securitised
(A) Positive/best-in-class screening only	0%	0%
(B) Negative screening only	0%	0%
(C) A combination of screening approaches	>75%	>75%

# **ESG/SUSTAINABILITY FUNDS AND PRODUCTS**

### LABELLING AND MARKETING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18	CORE	00 11–14	OO 18.1	PUBLIC	Labelling and marketing	1

Do you explicitly market any of your products and/or funds as ESG and/or sustainable?

● (A) Yes, we market products and/or funds as ESG and/or sustainable

Provide the percentage of AUM that your ESG and/or sustainability-marketed products or funds represent:

>50-75%

 $\circ$  (B) No, we do not offer products or funds explicitly marketed as ESG and/or sustainable

 $\circ~$  (C) Not applicable; we do not offer products or funds

### Additional information: (Voluntary)

The figure includes SFDR 8 and SFDR 9 labelled UB funds and asset management products. All internally managed UB funds are labelled SFDR 8 or SFDR 9. All UB 360 asset management strategies are labelled SFDR 8, except one. Thus, the vast majority of non-green products are externally managed.



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18.1	CORE	00 18	OO 18.2	PUBLIC	Labelling and marketing	1

Do any of your ESG and/or sustainability-marketed products and/or funds hold formal ESG and/or RI certification(s) or label(s) awarded by a third party?

(A) Yes, our ESG and/or sustainability-marketed products and/or funds hold formal labels or certifications
 Provide the percentage of AUM that your labelled and/or certified products and/or funds represent:

>50-75%

 $\circ$  (B) No, our ESG and/or sustainability-marketed products and/or funds do not hold formal labels or certifications

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18.2	CORE	OO 18.1	N/A	PUBLIC	Labelling and marketing	1

#### Which ESG/RI certifications or labels do you hold?

 $\Box$  (A) Commodity type label (e.g. BCI)

- ☑ (B) GRESB
- $\Box$  (C) Austrian Ecolabel (UZ49)
- $\Box$  (D) B Corporation
- ☑ (E) BREEAM
- □ (F) CBI Climate Bonds Standard
- □ (G) DDV-Nachhaltigkeitskodex-ESG-Strategie
- □ (H) DDV-Nachhaltigkeitskodex-ESG-Impact
- □ (I) EU Ecolabel
- □ (J) EU Green Bond Standard
- $\Box$  (K) Febelfin label (Belgium)
- □ (L) Finansol
- □ (M) FNG-Siegel Ecolabel (Germany, Austria and Switzerland)
- $\Box$  (N) Greenfin label (France)
- □ (O) Grüner Pfandbrief
- □ (P) ICMA Green Bond Principles
- □ (Q) ICMA Social Bonds Principles
- □ (R) ICMA Sustainability Bonds Principles
- □ (S) ICMA Sustainability-linked Bonds Principles
- □ (T) Kein Verstoß gegen Atomwaffensperrvertrag
- □ (U) Le label ISR (French government SRI label)
- $\Box$  (V) Luxflag Climate Finance
- $\Box$  (W) Luxflag Environment
- $\Box$  (X) Luxflag ESG
- $\Box$  (Y) Luxflag Green Bond
- $\Box$  (Z) Luxflag Microfinance
- □ (AA) Luxflag Sustainable Insurance Products
- □ (AB) National stewardship code
- $\Box$  (AC) Nordic Swan Ecolabel
- □ (AD) Other SRI label based on EUROSIF SRI Transparency Code (e.g. Novethic)
- □ (AE) People's Bank of China green bond guidelines
- □ (AF) RIAA (Australia)
- □ (AG) Towards Sustainability label (Belgium)



Morningstar Globes Sustainability Rating is given to 14 of our 16 listed equity and fixed income funds Morningstar Low Carbon Designation was given to 7 of our 16 listed equity and fixed income funds Our two real estate alternative investment funds have GRESB ratings, and include BREEAM certified real estate

### **PASSIVE INVESTMENTS**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 19	CORE	OO 5.3 FI, OO 11	LE 8, FI 10	PUBLIC	Passive investments	1

What percentage of your total internally managed passive listed equity and/or fixed income passive AUM utilise an ESG index or benchmark?

Percentage of AUM that utilise an ESG index or benchmar	k
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(B) Fixed income - passive

# SUMMARY OF REPORTING REQUIREMENTS

>75%

## SUMMARY OF REPORTING REQUIREMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 21	CORE	Multiple indicators	Multiple indicators	PUBLIC	Summary of reporting requirements	GENERAL

The following table shows which modules are mandatory or voluntary to report on in the separate PRI asset class modules. Where a module is voluntary, indicate if you wish to report on it.

Applicable modules	(1) Mandatory to report (pre-filled based on previous responses)	(2.1) Voluntary to report. Yes, I want to opt-in to reporting on the module	(2.2) Voluntary to report. No, I want to opt-out of reporting on the module
Policy, Governance and Strategy	۲	0	o
Confidence Building Measures	۲	0	o
(B) Listed equity – active – quantitative	۲	0	o



(C) Listed equity – active – fundamental	۲	0	0
(F) Fixed income – corporate	0	0	۲
(G) Fixed income – securitised	0	0	۲
(H) Fixed income – private debt	0	0	۲
(I) Private equity	0	0	۲
(J) Real estate	۲	0	0
(K) Infrastructure	0	0	۲
(T) External manager selection, appointment and monitoring (SAM) – listed equity - active	0	0	۲
(U) External manager selection, appointment and monitoring (SAM) – listed equity - passive	0	0	۲
(V) External manager selection, appointment and monitoring (SAM) – fixed income - active	0	0	۲
(W) External manager selection, appointment and monitoring (SAM) – fixed income - passive	0	0	۲
(X) External manager selection, appointment and monitoring (SAM) – private equity	0	0	۲
(Y) External manager selection, appointment and monitoring (SAM) – real estate	0	0	۲



# **OTHER ASSET BREAKDOWNS**

### **REAL ESTATE: BUILDING TYPE**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 24	CORE	00 21	RE 1, RE 9 - 10	PUBLIC	Real estate: Building type	GENERAL

What is the building type of your physical real estate assets?

☑ (A) Standing investments

☑ (B) New construction

 $\Box$  (C) Major renovation

### **REAL ESTATE: OWNERSHIP LEVEL**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 25	CORE	00 21	N/A	PUBLIC	Real estate: Ownership level	GENERAL

What is the percentage breakdown of your physical real estate assets by the level of ownership?



# **REAL ESTATE: MANAGEMENT TYPE**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 26	CORE	00 21	RE 1, RE 6–8, RE 13	PUBLIC	Real estate: Management type	GENERAL

### Who manages your physical real estate assets?

- ☑ (A) Direct management by our organisation
- **(B)** Third-party property managers that our organisation appoints
- ☑ (C) Other investors or their third-party property managers
- ☑ (D) Tenant(s) with operational control

# **SUBMISSION INFORMATION**

### **REPORT DISCLOSURE**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 32	CORE	00 3, 00 31	N/A	PUBLIC	Report disclosure	GENERAL

How would you like to disclose the detailed percentage figures you reported throughout the Reporting Framework?

• (A) Publish as absolute numbers

• (B) Publish as ranges



# POLICY, GOVERNANCE AND STRATEGY (PGS)

# POLICY

# **RESPONSIBLE INVESTMENT POLICY ELEMENTS**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 1	CORE	OO 8, OO 9	Multiple indicators	PUBLIC	Responsible investment policy elements	1, 2

Which elements are covered in your formal responsible investment policy(ies)?

(A) Overall approach to responsible investment

- (B) Guidelines on environmental factors
- ☑ (C) Guidelines on social factors
- ☑ (D) Guidelines on governance factors

(E) Guidelines on sustainability outcomes

 $\blacksquare$  (F) Guidelines tailored to the specific asset class(es) we hold

☑ (G) Guidelines on exclusions

☑ (H) Guidelines on managing conflicts of interest related to responsible investment

☑ (I) Stewardship: Guidelines on engagement with investees

 $\hfill\square$  (J) Stewardship: Guidelines on overall political engagement

☑ (K) Stewardship: Guidelines on engagement with other key stakeholders

☑ (L) Stewardship: Guidelines on (proxy) voting

 $\hfill\square$  (M) Other responsible investment elements not listed here

• (N) Our organisation does not have a formal responsible investment policy and/or our policy(ies) do not cover any responsible investment elements

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 2	CORE	PGS 1	Multiple, see guidance	PUBLIC	Responsible investment policy elements	1

Does your formal responsible investment policy(ies) include specific guidelines on systematic sustainability issues?

(A) Specific guidelines on climate change (may be part of guidelines on environmental factors)

(B) Specific guidelines on human rights (may be part of guidelines on social factors)

(C) Specific guidelines on other systematic sustainability issues

Specify:

Biodiversity

• (D) Our formal responsible investment policy(ies) does not include guidelines on systematic sustainability issues



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 3	CORE	PGS 1, PGS 2	N/A	PUBLIC	Responsible investment policy elements	6

Which elements of your formal responsible investment policy(ies) are publicly available?

☑ (A) Overall approach to responsible investment

Add link:

https://www.unitedbankers.fi/media/hcafaxgu/principles-for-responsible-investment-09-2023.pdf

### ☑ (B) Guidelines on environmental factors

Add link:

https://www.unitedbankers.fi/media/hcafaxgu/principles-for-responsible-investment-09-2023.pdf

(C) Guidelines on social factors

Add link:

https://www.unitedbankers.fi/media/hcafaxgu/principles-for-responsible-investment-09-2023.pdf

(D) Guidelines on governance factors Add link:

https://www.unitedbankers.fi/media/hcafaxgu/principles-for-responsible-investment-09-2023.pdf

(E) Guidelines on sustainability outcomes Add link:

https://www.unitedbankers.fi/media/hcafaxgu/principles-for-responsible-investment-09-2023.pdf

☑ (F) Specific guidelines on climate change (may be part of guidelines on environmental factors) Add link:

https://www.unitedbankers.fi/media/hcafaxgu/principles-for-responsible-investment-09-2023.pdf

☑ (G) Specific guidelines on human rights (may be part of guidelines on social factors) Add link:

https://www.unitedbankers.fi/media/hcafaxgu/principles-for-responsible-investment-09-2023.pdf

- $\Box$  (H) Specific guidelines on other systematic sustainability issues
- ☑ (I) Guidelines tailored to the specific asset class(es) we hold Add link:

https://www.unitedbankers.fi/media/hcafaxgu/principles-for-responsible-investment-09-2023.pdf

☑ (J) Guidelines on exclusions

Add link:

https://www.unitedbankers.fi/media/hcafaxgu/principles-for-responsible-investment-09-2023.pdf

- $\Box$  (K) Guidelines on managing conflicts of interest related to responsible investment
- Image: Content of the second secon

https://unitedbankers.fi/media/kvuku0bq/ownership-policy-05012024.pdf

☑ (N) Stewardship: Guidelines on engagement with other key stakeholders Add link:



#### https://unitedbankers.fi/media/kvuku0bq/ownership-policy-05012024.pdf

#### O) Stewardship: Guidelines on (proxy) voting Add link:

#### https://www.issgovernance.com/file/policy/active/specialty/Sustainability-International-Voting-Guidelines.pdf

#### • (Q) No elements of our formal responsible investment policy(ies) are publicly available

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 5	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

Which elements are covered in your organisation's policy(ies) or guidelines on stewardship?

### ☑ (A) Overall stewardship objectives

(B) Prioritisation of specific ESG factors to be advanced via stewardship activities

□ (C) Criteria used by our organisation to prioritise the investees, policy makers, key stakeholders, or other entities on which to focus our stewardship efforts

(D) How different stewardship tools and activities are used across the organisation

(E) Approach to escalation in stewardship

☑ (F) Approach to collaboration in stewardship

 $\hfill\square$  (G) Conflicts of interest related to stewardship

 $\Box$  (H) How stewardship efforts and results are communicated across the organisation to feed into investment decision-making and vice versa

□ (I) Other

 $\circ~$  (J) None of the above elements is captured in our policy(ies) or guidelines on stewardship

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 6	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

### Does your policy on (proxy) voting include voting principles and/or guidelines on specific ESG factors?

(A) Yes, it includes voting principles and/or guidelines on specific environmental factors

(B) Yes, it includes voting principles and/or guidelines on specific social factors

☑ (C) Yes, it includes voting principles and/or guidelines on specific governance factors

• (D) Our policy on (proxy) voting does not include voting principles or guidelines on specific ESG factors

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 7	CORE	OO 9	N/A	PUBLIC	Responsible investment policy elements	2

### Does your organisation have a policy that states how (proxy) voting is addressed in your securities lending programme?

• (A) We have a publicly available policy to address (proxy) voting in our securities lending programme

• (B) We have a policy to address (proxy) voting in our securities lending programme, but it is not publicly available



- $\circ~$  (C) We rely on the policy of our external service provider(s)
- $\circ\,$  (D) We do not have a policy to address (proxy) voting in our securities lending programme
- (E) Not applicable; we do not have a securities lending programme

### **RESPONSIBLE INVESTMENT POLICY COVERAGE**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 8	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy coverage	1

### What percentage of your total AUM is covered by the below elements of your responsible investment policy(ies)?

	Combined AUM coverage of all policy elements
<ul> <li>(A) Overall approach to responsible investment</li> <li>(B) Guidelines on environmental factors</li> <li>(C) Guidelines on social factors</li> <li>(D) Guidelines on governance factors</li> </ul>	(6) >90% to <100%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 9	CORE	PGS 2	N/A	PUBLIC	Responsible investment policy coverage	1

What proportion of your AUM is covered by your formal policies or guidelines on climate change, human rights, or other systematic sustainability issues?

	AUM coverage
(A) Specific guidelines on climate change	(2) for a majority of our AUM
(B) Specific guidelines on human rights	(2) for a majority of our AUM
(C) Specific guidelines on other systematic sustainability issues	(2) for a majority of our AUM



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10	CORE	OO 8, OO 9, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

Per asset class, what percentage of your AUM is covered by your policy(ies) or guidelines on stewardship with investees?

#### (A) Listed equity

- (1) Percentage of AUM covered
  - (1) >0% to 10%
  - (2) >10% to 20%
  - (3) >20% to 30%
  - (4) >30% to 40%
  - (5) >40% to 50%
  - (6) >50% to 60%
  - (7) >60% to 70%
  - (8) >70% to 80%
  - (9) >80% to 90%
  - (10) >90% to <100%
  - (11) 100%

#### (B) Fixed income

- (1) Percentage of AUM covered
  - (1) >0% to 10%
  - (2) >10% to 20%
  - (3) >20% to 30%
  - (4) >30% to 40%
  - (5) >40% to 50%
  - (6) >50% to 60%
  - (7) >60% to 70%
  - (8) >70% to 80%
  - (9) >80% to 90%
  - (10) >90% to <100%</li>
  - (11) 100%

### ☑ (C) Private equity

- (1) Percentage of AUM covered
  - (1) >0% to 10%
  - (2) >10% to 20%
  - (3) >20% to 30%
  - (4) >30% to 40%
  - (5) >40% to 50%
  - (6) >50% to 60%
  - (7) >60% to 70%
  - (1) 200% to 10%
    (8) >70% to 80%

  - (9) >80% to 90%
  - (10) >90% to <100%</li>
  - (11) 100%

#### ☑ (D) Real estate

- (1) Percentage of AUM covered
  - (1) >0% to 10%
  - (2) >10% to 20%
  - (3) >20% to 30%
  - (4) >30% to 40%
  - (5) >40% to 50%
  - (6) >50% to 60%
  - (7) >60% to 70%
  - (8) >70% to 80%



- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%
- ☑ (E) Infrastructure
  - (1) Percentage of AUM covered
    - (1) >0% to 10%
    - (2) >10% to 20%
    - (3) >20% to 30%
    - (4) >30% to 40%
    - (5) >40% to 50%
    - (6) >50% to 60%
    - (7) >60% to 70%
    - (8) >70% to 80%
    - (9) >80% to 90%
    - (10) >90% to <100%
    - **(11) 100%**

### G (G) Forestry

- (1) Percentage of AUM covered
  - (1) >0% to 10%
  - (2) >10% to 20%
  - (3) >20% to 30%
  - (4) >30% to 40%
  - (5) >40% to 50%
  - (6) >50% to 60%
  - (7) >60% to 70%
  - (1) \* 6676 to 1676
    (8) >70% to 80%
  - (9) >80% to 90%
  - (10) >90% to <100%</li>
  - **(11)** 100%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10.1	CORE	OO 9.1, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

### What percentage of your listed equity holdings is covered by your guidelines on (proxy) voting?

### ☑ (A) Actively managed listed equity

- (1) Percentage of your listed equity holdings over which you have the discretion to vote
  - (1) >0% to 10%
  - (2) >10% to 20%
  - (3) >20% to 30%
  - (4) >30% to 40%
  - (5) >40% to 50%
  - (6) >50% to 60%
  - (7) >60% to 70%
  - (1) \* 66 % to 10 %
     (8) >70% to 80%
  - (9) >80% to 90%
  - (10) >90% to <100%</li>
  - (11) 100%

### (B) Passively managed listed equity

(1) Percentage of your listed equity holdings over which you have the discretion to vote

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%



- (6) >50% to 60%
  (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- **(11)** 100%

# GOVERNANCE

# **ROLES AND RESPONSIBILITIES**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11	CORE	N/A	Multiple indicators	PUBLIC	Roles and responsibilities	1

# Which senior level body(ies) or role(s) in your organisation have formal oversight over and accountability for responsible investment?

#### ☑ (A) Board members, trustees, or equivalent

#### (B) Senior executive-level staff, or equivalent

Specify:

United Bankers' Executive Management Team ("EMT") manages the day-to-day administration of all companies of the Group. A person responsible for sustainability (CEO) has been appointed to the EMT, and the Head of ESG reports to this individual. The EMT ensures that the principles and regulations governing sustainability are integrated into the policies and processes across the Group. The EMT regularly reports to the Board of Directors on topical responsible investment issues.

#### (C) Investment committee, or equivalent

Specify:

United Bankers' ESG Steering Group, chaired by the Head of ESG, steers and manages the Group's ongoing sustainability and responsible investment work. The Steering Group regularly reports to the EMT and is supported by the ESG Team comprised of internal subject matter experts.

#### ☑ (D) Head of department, or equivalent

Specify department:

United Bankers' Head of ESG is responsible for the overall sustainability and responsible investment development work within the Group. Head of ESG is part of the Extended Management Team.

• (E) None of the above bodies and roles have oversight over and accountability for responsible investment



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.1	CORE	PGS 1, PGS 2, PGS 11	N/A	PUBLIC	Roles and responsibilities	1, 2

Does your organisation's senior level body(ies) or role(s) have formal oversight over and accountability for the elements covered in your responsible investment policy(ies)?

	(1) Board members, trustees, or equivalent	(2) Senior executive-level staff, investment committee, head of department, or equivalent
(A) Overall approach to responsible investment		
(B) Guidelines on environmental, social and/or governance factors		
(C) Guidelines on sustainability outcomes		
(D) Specific guidelines on climate change (may be part of guidelines on environmental factors)		
(E) Specific guidelines on human rights (may be part of guidelines on social factors)		
(F) Specific guidelines on other systematic sustainability issues		
(G) Guidelines tailored to the specific asset class(es) we hold		
(H) Guidelines on exclusions		
(I) Guidelines on managing conflicts of interest related to responsible investment		
(J) Stewardship: Guidelines on engagement with investees		
(L) Stewardship: Guidelines on engagement with other key stakeholders		



(M) Stewardship: Guidelines on (proxy) voting		
(N) This role has no formal oversight over and accountability for any of the above elements covered in our responsible investment policy(ies)	0	Ο

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.2	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1-6

Does your organisation have governance processes or structures to ensure that your overall political engagement is aligned with your commitment to the principles of PRI, including any political engagement conducted by third parties on your behalf?

• (A) Yes

• (B) No

• (C) Not applicable, our organisation does not conduct any form of political engagement directly or through any third parties

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 12	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1

In your organisation, which internal or external roles are responsible for implementing your approach to responsible investment?

☑ (A) Internal role(s)

Specify:

CEO, Head of ESG, ESG Manager/Analyst, Portfolio Managers, Head of Compliance

☑ (B) External investment managers, service providers, or other external partners or suppliers Specify:

Portfolio Managers

• (C) We do not have any internal or external roles with responsibility for implementing responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 13	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

Does your organisation use responsible investment KPIs to evaluate the performance of your board members, trustees, or equivalent?

## (A) Yes, we use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent

Describe: (Voluntary)

• (B) No, we do not use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 14	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

Does your organisation use responsible investment KPIs to evaluate the performance of your senior executive-level staff (or equivalent), and are these KPIs linked to compensation?

(A) Yes, we use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

Indicate whether these responsible investment KPIs are linked to compensation

• (1) KPIs are linked to compensation

- (2) KPIs are not linked to compensation as these roles do not have variable compensation
- $\circ$  (3) KPIs are not linked to compensation even though these roles have variable compensation
- Describe: (Voluntary)

• (B) No, we do not use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

### EXTERNAL REPORTING AND DISCLOSURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 16	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

What elements are included in your regular reporting to clients and/or beneficiaries for the majority of your AUM?

(A) Any changes in policies related to responsible investment

- ☑ (B) Any changes in governance or oversight related to responsible investment
- ☑ (C) Stewardship-related commitments
- ☑ (D) Progress towards stewardship-related commitments
- (E) Climate-related commitments
- ☑ (F) Progress towards climate-related commitments
- **G** (G) Human rights-related commitments
- ☑ (H) Progress towards human rights-related commitments
- (I) Commitments to other systematic sustainability issues
- ☑ (J) Progress towards commitments on other systematic sustainability issues

• (K) We do not include any of these elements in our regular reporting to clients and/or beneficiaries for the majority of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 17	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose climate-related information in line with the Task Force on Climate-Related Financial Disclosures' (TCFD) recommendations?

(A) Yes, including all governance-related recommended disclosures



(B) Yes, including all strategy-related recommended disclosures

(C) Yes, including all risk management-related recommended disclosures

- (D) Yes, including all applicable metrics and targets-related recommended disclosures
- (E) None of the above

Add link(s):

https://unitedbankers.fi/media/ot0d1j0v/united-bankers-annual-report-2023.pdf

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 19	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose its membership in and support for trade associations, think tanks or similar bodies that conduct any form of political engagement?

• (A) Yes, we publicly disclosed our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement

• (B) No, we did not publicly disclose our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement

• (C) Not applicable, we were not members in or supporters of any trade associations, think tanks, or similar bodies that conduct any form of political engagement during the reporting year

### STRATEGY

### **CAPITAL ALLOCATION**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 20	CORE	N/A	N/A	PUBLIC	Capital allocation	1

#### Which elements do your organisation-level exclusions cover?

(A) Exclusions based on our organisation's values or beliefs regarding particular sectors, products or services

□ (B) Exclusions based on our organisation's values or beliefs regarding particular regions or countries

☑ (C) Exclusions based on minimum standards of business practice aligned with international norms such as the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, UN Security Council sanctions or the UN Global Compact

(D) Exclusions based on our organisation's climate change commitments

 $\Box$  (E) Other elements

• (F) Not applicable; our organisation does not have any organisation-level exclusions



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 21	CORE	N/A	N/A	PUBLIC	Capital allocation	1

How does your responsible investment approach influence your strategic asset allocation process?

(A) We incorporate ESG factors into our assessment of expected asset class risks and returns

Select from dropdown list:

(1) for all of our AUM subject to strategic asset allocation

- (2) for a majority of our AUM subject to strategic asset allocation
- (3) for a minority of our AUM subject to strategic asset allocation

(B) We incorporate climate change-related risks and opportunities into our assessment of expected asset class risks and returns

Select from dropdown list:

(1) for all of our AUM subject to strategic asset allocation

- $\circ$  (2) for a majority of our AUM subject to strategic asset allocation
- (3) for a minority of our AUM subject to strategic asset allocation

C) We incorporate human rights-related risks and opportunities into our assessment of expected asset class risks and returns

Select from dropdown list:

(1) for all of our AUM subject to strategic asset allocation

• (2) for a majority of our AUM subject to strategic asset allocation

• (3) for a minority of our AUM subject to strategic asset allocation

□ (D) We incorporate risks and opportunities related to other systematic sustainability issues into our assessment of expected asset class risks and returns

• (E) We do not incorporate ESG factors, climate change, human rights or other systematic sustainability issues into our assessment of expected asset class risks and returns

 $\circ$  (F) Not applicable; we do not have a strategic asset allocation process



### STEWARDSHIP: OVERALL STEWARDSHIP STRATEGY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 22	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

For the majority of AUM within each asset class, which of the following best describes your primary stewardship objective?

	(1) Listed equity	(2) Fixed income	(3) Private equity	(4) Real estate	(5) Infrastructu	(7) ire Forestry
(A) Maximise our portfolio-level risk- adjusted returns. In doing so, we seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.	۲	۲	۲	۲	۲	۲
(B) Maximise our individual investments' risk-adjusted returns. In doing so, we do not seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.	0	0	ο	0	o	O

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Which of the following best describes your organisation's default position, or the position of the external service providers or external managers acting on your behalf, concerning collaborative stewardship efforts?

(A) We recognise the value of collective action, and as a result, we prioritise collaborative stewardship efforts wherever possible

- (B) We collaborate on a case-by-case basis
- $\circ~$  (C) Other
- $\circ~$  (D) We do not join collaborative stewardship efforts



### **STEWARDSHIP: (PROXY) VOTING**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 29	CORE	OO 9, PGS 1	N/A	PUBLIC	Stewardship: (Proxy) voting	2

When you use external service providers to give recommendations, how do you ensure those recommendations are consistent with your organisation's (proxy) voting policy?

☑ (A) Before voting is executed, we review external service providers' voting recommendations for controversial and high-profile votes

Select from the below list:

- (1) in all cases
- (2) in a majority of cases
- (3) in a minority of cases

 $\Box$  (B) Before voting is executed, we review external service providers' voting recommendations where the application of our voting policy is unclear

 $\Box$  (C) We ensure consistency with our voting policy by reviewing external service providers' voting recommendations only after voting has been executed

 $\circ$  (D) We do not review external service providers' voting recommendations

• (E) Not applicable; we do not use external service providers to give voting recommendations

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 30	CORE	00 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

#### How is voting addressed in your securities lending programme?

• (A) We recall all securities for voting on all ballot items

• (B) When a vote is deemed important according to pre-established criteria (e.g. high stake in the company), we recall all our securities for voting

• (C) Other

• (D) We do not recall our securities for voting purposes

• (E) Not applicable; we do not have a securities lending programme

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 31	CORE	00 9.1	N/A	PUBLIC	Stewardship: (Proxy) voting	2

For the majority of votes cast over which you have discretion to vote, which of the following best describes your decision making approach regarding shareholder resolutions (or that of your external service provider(s) if decision making is delegated to them)?

(A) We vote in favour of resolutions expected to advance progress on our stewardship priorities, including affirming a company's good practice or prior commitment

 $\circ~$  (B) We vote in favour of resolutions expected to advance progress on our stewardship priorities, but only if the investee

company has not already publicly committed to the action(s) requested in the proposal

 $\circ~$  (C) We vote in favour of shareholder resolutions only as an escalation measure

 $\circ~$  (D) We vote in favour of the investee company management's recommendations by default

 $\circ~$  (E) Not applicable; we do not vote on shareholder resolutions



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 32	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

## During the reporting year, how did your organisation, or your external service provider(s), pre-declare voting intentions prior to voting in annual general meetings (AGMs) or extraordinary general meetings (EGMs)?

□ (A) We pre-declared our voting intentions publicly through the PRI's vote declaration system on the Resolution Database

 $\Box$  (B) We pre-declared our voting intentions publicly by other means, e.g. through our website

 $\square$  (C) We privately communicated our voting decision to investee companies prior to the AGM/EGM

(D) We did not privately or publicly communicate our voting intentions prior to the AGM/EGM

 $\circ$  (E) Not applicable; we did not cast any (proxy) votes during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 33	CORE	OO 9	PGS 33.1	PUBLIC	Stewardship: (Proxy) voting	2

## After voting has taken place, do you publicly disclose your (proxy) voting decisions or those made on your behalf by your external service provider(s), company by company and in a central source?

• (A) Yes, for all (proxy) votes

- $\circ~$  (B) Yes, for the majority of (proxy) votes
- (C) Yes, for a minority of (proxy) votes

Add link(s):

https://unitedbankers.fi/media/x4nn1xgp/liite\_rahastojen-vuosikertomus-2023.pdf

Explain why you only publicly disclose a minority of (proxy) voting decisions:

We report on our proxy voting practices on our official website, but not on a company by company basis for all votes. We disclose our proxy voting decisions on a company by company basis for the votes against/abstain/withhold. The information is available on our official website as part of our funds' annual reporting (annex report on board statistics p.120-217).

• (D) No, we do not publicly report our (proxy) voting decisions company-by-company and in a central source

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 33.1	CORE	PGS 33	N/A	PUBLIC	Stewardship: (Proxy) voting	2

In the majority of cases, how soon after an investee's annual general meeting (AGM) or extraordinary general meeting (EGM) do you publish your voting decisions?

- $\circ~$  (A) Within one month of the AGM/EGM
- (B) Within three months of the AGM/EGM

• (C) Within six months of the AGM/EGM

- (D) Within one year of the AGM/EGM
- (E) More than one year after the AGM/EGM



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 34	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

After voting has taken place, did your organisation, and/or the external service provider(s) acting on your behalf, communicate the rationale for your voting decisions during the reporting year?

	(1) In cases where we abstained or voted against management recommendations	(2) In cases where we voted against an ESG-related shareholder resolution
(A) Yes, we publicly disclosed the rationale		
(B) Yes, we privately communicated the rationale to the company		
(C) We did not publicly or privately communicate the rationale, or we did not track this information	۲	۲
(D) Not applicable; we did not abstain or vote against management recommendations or ESG-related shareholder resolutions during the reporting year	O	Ο



### **STEWARDSHIP: ESCALATION**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 36	CORE	OO 8, OO 9 HF, OO 9	N/A	PUBLIC	Stewardship: Escalation	2
	equity holdings, what ers acting on your beha			nisation, or the	e external investm	ent managers or
			(1	L) Listed equity	/	
	r broadening an borative engagement new one					
	-filing, and/or shareholder resolution					
	engaging the entity, an open letter					
	gainst the re-election re board directors					
board of dire	jainst the chair of the ctors, or equivalent, ependent director					
(F) Divesting						
(G) Litigation	l					
(H) Other						
not use any o	easures for our listed			o		



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 37	CORE	Multiple, see guidance	N/A	PUBLIC	Stewardship: Escalation	2

## For your corporate fixed income assets, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?

(A) Joining or broadening an existing collaborative engagement or creating a new one

- $\Box$  (B) Publicly engaging the entity, e.g. signing an open letter
- ☑ (C) Not investing
- Image: Displaying the contract of the investee entity
- ☑ (E) Divesting
- $\Box$  (F) Litigation
- □ (G) Other
- (H) In the past three years, we did not use any of the above escalation measures for our corporate fixed income assets

### STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39	CORE	OO 8, OO 9	PGS 39.1, PGS 39.2	PUBLIC	Stewardship: Engagement with policy makers	2

Did your organisation, or the external investment managers or service providers acting on your behalf, engage with policy makers as part of your responsible investment approach during the reporting year?

 $\Box$  (A) Yes, we engaged with policy makers directly

(B) Yes, we engaged with policy makers through the leadership of or active participation in working groups or collaborative initiatives, including via the PRI

 $\Box$  (C) Yes, we were members of, supported, or were in another way affiliated with third party organisations, including trade associations and non-profit organisations, that engage with policy makers, excluding the PRI

• (D) We did not engage with policy makers directly or indirectly during the reporting year beyond our membership in the PRI

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.1	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, what methods did you, or the external investment managers or service providers acting on your behalf, use to engage with policy makers as part of your responsible investment approach?

- ☑ (A) We participated in 'sign-on' letters
- (B) We responded to policy consultations
- ☑ (C) We provided technical input via government- or regulator-backed working groups Describe:



As a member of Finance Finland, our positions were disclosed as part of Finance Finland's positions regarding sustainability and sustainable finance regulation:

https://www.finanssiala.fi/en/Finanssiala

 $\Box$  (D) We engaged policy makers on our own initiative

□ (E) Other methods

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.2	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, did your organisation publicly disclose details of your engagement with policy makers conducted as part of your responsible investment approach, including through external investment managers or service providers?

 $\hfill\square$  (A) We publicly disclosed all our policy positions

 $\Box$  (B) We publicly disclosed details of our engagements with policy makers

• (C) No, we did not publicly disclose details of our engagement with policy makers conducted as part of our responsible investment approach during the reporting year

Explain why:

As a member of Finance Finland, our positions were disclosed as part of Finance Finland's positions regarding sustainability and sustainable finance regulation:

https://www.finanssiala.fi/en/Finanssiala

### **CLIMATE CHANGE**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41	CORE	N/A	PGS 41.1	PUBLIC	Climate change	General

#### Has your organisation identified climate-related risks and opportunities affecting your investments?

☑ (A) Yes, within our standard planning horizon

Specify the risks and opportunities identified and your relevant standard planning horizon:



Please see key climate risks and opportunities listed for each key asset class below:

Listed Equity: limited physical and transition risks due to high level of portfolio diversification; increased market demand for low carbon intensity portfolios (opportunities)

Fixed Income: limited physical and transition risks due to high level of portfolio diversification; increased market demand for low carbon intensity portfolios (opportunities)

Private equity: limited physical and transition risks identified; increased market demand for portfolios mitigating climate change (opportunities)

Real Estate: flooding, hail (acute physical risks); fire weather stress, rising sea levels (chronic physical risks); regulatory changes, increased energy efficiency requirements, energy pricing (transition risks); increased market demand for sustainable properties and onsite renewable energy production (opportunities)

Forestry: heat stress, forest fires, flooding (acute physical risks); changes in biodiversity (chronic physical risks); increased demand for sustainably managed forests (opportunities)

United Bankers' standard planning horizon is c.

5-10 years, which is also in line with average investment holding periods.

#### $\Box$ (B) Yes, beyond our standard planning horizon

• (C) No, we have not identified climate-related risks and/or opportunities affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41.1	CORE	PGS 41	N/A	PUBLIC	Climate change	General

## Does your organisation integrate climate-related risks and opportunities affecting your investments in its overall investment strategy, financial planning and (if relevant) products?

## (A) Yes, our overall investment strategy, financial planning and (if relevant) products integrate climate-related risks and opportunities

Describe how climate-related risks and opportunities have affected or are expected to affect your investment strategy, financial planning and (if relevant) products:

The risks and opportunities presented by climate change have a significant impact on United Bankers' investment activities and sustainability work. The United Bankers Board of Directors and Executive Committee have made climate change and the green transition a priority across the Group for both strategic and humane reasons. At the Board level, climate issues are regularly addressed as part of the Group's broader sustainability work. The Board of Directors also approves the United Bankers Responsible Investment Principles, which guide investment activities by defining responsible investment policies and practices. The Head of ESG of United Bankers is part of the extended executive team that meets several times a year.

Working to mitigate climate change is one of the focus areas of United Bankers' business.

At United Bankers, the most significant climate risks and opportunities relate to investment activities, as the direct environmental impact of the Group's own operations is limited. In 2022, the majority (99.6%) of the Group's total carbon footprint was made up of the carbon footprint of the investments in the products offered by the group (Scope 3, Category 15). This highlights the importance of climate work in asset management. United Bankers' process to identify climate-related risks and opportunities in the short, medium, and long term was launched in late 2022, with the aim of identifying the most significant climate drivers in each asset class to ensure regular monitoring. United Bankers reports on climate risk indicators of daily valued equity and fixed income funds, as well as the funds' exposure to physical climate risks.



Climate work at United Bankers focuses on the continuous development of investment products and their strategies to consider climaterelated risks and opportunities. Climate metrics are reviewed throughout the investment period, from the investment decision to the sale of the investment. These metrics include the carbon intensity of the investment and the carbon risk of the investment as defined by the TCFD, which describes the investment's transition risk. In addition, United Bankers' Principles for Responsible Investment define climate-based exclusion criteria for activities such as coal production, its use in energy generation, and oil sands extraction. Active lobbying and voting on climate-related issues at shareholder meetings are also an important part of daily portfolio management. Climate opportunities are an important part of United Bankers' product development and investment strategy formulation.

Climate risks are identified and assessed as part of United Bankers' daily portfolio and risk management. Responsibilities are divided so that the risk analysis of individual investments is primarily the responsibility of portfolio management, while the management of the aggregate climate risk of United Bankers' products is the responsibility of the responsible investment team and the Sustainability Steering Group. The Risk management function integrates climate risks into the risk management of the Group as a whole. The Board of Directors is responsible for the direction of the company's climate strategy. The risk analysis utilizes company-level data from several independent ESG data sources, including Morningstar, Sustainalytics, and Bloomberg. In addition, United Bankers actively monitors the setting and achievement of climate targets through CDP and other similar databases.

In 2023, United Bankers published its climate roadmap, and committed to setting climate targets in accordance with the Science Based Targets initiative.

United Bankers aims to reduce greenhouse gas emissions from investments and increasing carbon sequestration so that the investments' carbon sequestration exceeds emissions by 2030.

United Bankers' objective is to keep the climate risks of the entire Group at a level that does not result in significant negative impacts. Methodologies and metrics for assessing climate risk vary by asset class and require further development. United Bankers aims to proactively identify the climate risks that are relevant to its operations and to identify opportunities related to the green transition.

• (B) No, our organisation has not yet integrated climate-related risks and opportunities into its investment strategy, financial planning and (if relevant) products

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 42	PLUS	N/A	N/A	PUBLIC	Climate change	General

#### Which sectors are covered by your organisation's strategy addressing high-emitting sectors?

#### (A) Coal

Describe your strategy:

United Bankers avoids investing in companies, where a minimum of 25 per cent of the company's revenues come from the use of thermal coal in energy production or oil sands extraction. United Bankers may deviate from such exclusion if the company has a clear plan for altering its operations.

#### 🗆 (B) Gas

#### ✓ (C) Oil

Describe your strategy:

United Bankers avoids investing in companies, where a minimum of 25 per cent of the company's revenues come from the use of thermal coal in energy production or oil sands extraction. United Bankers may deviate from such exclusion if the company has a clear plan for altering its operations.

- □ (D) Utilities
- □ (E) Cement
- 🗆 (F) Steel
- $\Box$  (G) Aviation
- $\Box$  (H) Heavy duty road
- $\Box$  (I) Light duty road
- □ (J) Shipping
- □ (K) Aluminium

□ (L) Agriculture, forestry, fishery



□ (M) Chemicals

 $\Box$  (N) Construction and buildings

 $\Box$  (O) Textile and leather

□ (P) Water

□ (Q) Other

• (R) We do not have a strategy addressing high-emitting sectors

#### Provide a link(s) to your strategy(ies), if available

https://unitedbankers.fi/media/hcafaxgu/principles-for-responsible-investment-09-2023.pdf

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 43	CORE	N/A	N/A	PUBLIC	Climate change	General

### Has your organisation assessed the resilience of its investment strategy in different climate scenarios, including one in which the average temperature rise is held to below 2 degrees Celsius (preferably to 1.5 degrees Celsius) above preindustrial levels?

□ (A) Yes, using the Inevitable Policy Response Forecast Policy Scenario (FPS) or Required Policy Scenario (RPS)

 $\Box$  (B) Yes, using the One Earth Climate Model scenario

□ (C) Yes, using the International Energy Agency (IEA) Net Zero scenario

 $\Box$  (D) Yes, using other scenarios

• (E) No, we have not assessed the resilience of our investment strategy in different climate scenarios, including one that holds temperature rise to below 2 degrees

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 44	CORE	N/A	N/A	PUBLIC	Climate change	General

## Does your organisation have a process to identify, assess, and manage the climate-related risks (potentially) affecting your investments?

#### (A) Yes, we have a process to identify and assess climate-related risks

(1) Describe your process

For fixed income and equity funds, at the heart of the climate risk analysis are carbon intensity and carbon risk indicators, which allow portfolio managers and the ESG team to quickly understand the relative greenhouse gas emissions of a company and its exposure to transition risk. If the indicators indicate a high level of climate risk, the next step in the analysis is to examine the current status of and progress towards the company's science-based climate targets. The analysis will also include, where appropriate, a comparison of the climate risk of the investee within a relevant reference group, as climate risks depend on the company's industry and geographical location. The analysis of physical climate risks was introduced in 2023 as part of the analysis of fixed income and equity funds. The risk analysis utilizes company-level data from several independent ESG data sources, including Morningstar, Sustainalytics, and Bloomberg. In addition, United Bankers actively monitors the setting and achievement of climate targets through CDP and other similar databases.

The climate risk analysis of real estate funds focuses on physical climate risks,. As United Bankers' real estate funds invest in all Nordic countries except Iceland, the average climate risks are significantly lower than in Central Europe and the Americas, for example. In terms of regional risks, flood risk affects some properties in coastal areas.



According to estimates, one property of all properties is considered to be at medium-level risk of flooding. In terms of climate risk, properties are categorized as low, medium, or high risk. United Bankers works to keep the climate risk of its property portfolios low. In 2024, further efforts have already been made to identify and assess both physical and transition risks. The GRESB international real estate sustainability assessment, which includes several climate risk indicators, is also used to assess real estate investments.

In forest funds, the management of physical climate risks is strongly linked to the management of the financial risks of the fund, as the forest holdings in which forest funds invest are directly exposed to both acute and chronic physical risks. In 2024, further analysis has already been carried out on the physical climate risks of United Bankers' forest funds.

(2) Describe how this process is integrated into your overall risk management

Climate risks are identified and assessed as part of United Bankers' daily portfolio and risk management. Responsibilities are divided so that the risk analysis of individual investments is primarily the responsibility of portfolio management, while the management of the aggregate climate risk of United Bankers' products is the responsibility of the responsible investment team and the Sustainability Steering Group. The Risk management function integrates climate risks into the risk management of the Group as a whole. The Board of Directors is responsible for the direction of the company's climate strategy.

 $\Box$  (B) Yes, we have a process to manage climate-related risks

• (C) No, we do not have any processes to identify, assess, or manage the climate-related risks affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 45	CORE	N/A	N/A	PUBLIC	Climate change	General

## During the reporting year, which of the following climate risk metrics or variables affecting your investments did your organisation use and publicly disclose?

#### ☑ (A) Exposure to physical risk

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
  - (1) Metric or variable used
  - (2) Metric or variable used and disclosed
  - (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://unitedbankers.fi/media/epbhfv2r/ub\_sustainability\_report\_2023.pdf

#### (B) Exposure to transition risk

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
  - (1) Metric or variable used
  - (2) Metric or variable used and disclosed
  - (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://unitedbankers.fi/media/epbhfv2r/ub\_sustainability\_report\_2023.pdf

#### $\Box$ (C) Internal carbon price

- ☑ (D) Total carbon emissions
  - (1) Indicate whether this metric or variable was used and disclosed, including the methodology
    - (1) Metric or variable used
    - (2) Metric or variable used and disclosed
    - (3) Metric or variable used and disclosed, including methodology
  - (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://unitedbankers.fi/media/epbhfv2r/ub\_sustainability\_report\_2023.pdf

#### (E) Weighted average carbon intensity

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
  - (1) Metric or variable used



- $\circ~$  (2) Metric or variable used and disclosed
- (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://unitedbankers.fi/media/epbhfv2r/ub\_sustainability\_report\_2023.pdf

- $\Box$  (F) Avoided emissions
- $\Box$  (G) Implied Temperature Rise (ITR)
- □ (H) Non-ITR measure of portfolio alignment with UNFCCC Paris Agreement goals
- □ (I) Proportion of assets or other business activities aligned with climate-related opportunities
- ☑ (J) Other metrics or variables
  - Specify:

Carbon sinks and carbon balance of UB forestry funds in tCO2e/year and in absolute tCO2e.

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
  - (1) Metric or variable used
  - (2) Metric or variable used and disclosed
  - (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://unitedbankers.fi/media/epbhfv2r/ub\_sustainability\_report\_2023.pdf

• (K) Our organisation did not use or publicly disclose any climate risk metrics or variables affecting our investments during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 46	CORE	N/A	N/A	PUBLIC	Climate change	General

## During the reporting year, did your organisation publicly disclose its Scope 1, Scope 2, and/or Scope 3 greenhouse gas emissions?

☑ (A) Scope 1 emissions

- (1) Indicate whether this metric was disclosed, including the methodology
  - (1) Metric disclosed
  - (2) Metric and methodology disclosed
- (2) Provide links to the disclosed metric and methodology, as applicable

https://unitedbankers.fi/media/epbhfv2r/ub sustainability report 2023.pdf

- (B) Scope 2 emissions
  - (1) Indicate whether this metric was disclosed, including the methodology
    - (1) Metric disclosed
    - (2) Metric and methodology disclosed
  - (2) Provide links to the disclosed metric and methodology, as applicable

https://unitedbankers.fi/media/epbhfv2r/ub\_sustainability\_report\_2023.pdf

- IC) Scope 3 emissions (including financed emissions)
  - (1) Indicate whether this metric was disclosed, including the methodology
    - (1) Metric disclosed
    - (2) Metric and methodology disclosed
  - (2) Provide links to the disclosed metric and methodology, as applicable

https://unitedbankers.fi/media/epbhfv2r/ub\_sustainability\_report\_2023.pdf

• (D) Our organisation did not publicly disclose its Scope 1, Scope 2, or Scope 3 greenhouse gas emissions during the reporting year



### SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47	CORE	N/A	Multiple indicators	PUBLIC	Sustainability outcomes	1, 2

Has your organisation identified the intended and unintended sustainability outcomes connected to its investment activities?

(A) Yes, we have identified one or more specific sustainability outcomes connected to our investment activities

• (B) No, we have not yet identified the sustainability outcomes connected to any of our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.1	CORE	PGS 47	N/A	PUBLIC	Sustainability outcomes	1, 2

Which widely recognised frameworks has your organisation used to identify the intended and unintended sustainability outcomes connected to its investment activities?

☑ (A) The UN Sustainable Development Goals (SDGs) and targets

(B) The UNFCCC Paris Agreement

☑ (C) The UN Guiding Principles on Business and Human Rights (UNGPs)

(D) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business

**Conduct for Institutional Investors** 

- (E) The EU Taxonomy
- $\Box$  (F) Other relevant taxonomies
- ☑ (G) The International Bill of Human Rights
- (H) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- $\Box$  (I) The Convention on Biological Diversity
- ☑ (J) Other international framework(s)

Specify:

Task Force on Climate-Related Financial Disclosures (TCFD)

 $\Box$  (K) Other regional framework(s)

☑ (L) Other sectoral/issue-specific framework(s)

Specify:

Forest Stewardship Council (FSC) sustainable forestry certifications and Programme for the Endorsement of Forest Certification (PEFC) sustainable forestry certifications

• (M) Our organisation did not use any widely recognised frameworks to identify the intended and unintended sustainability outcomes connected to its investment activities



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.2	CORE	PGS 47	PGS 48	PUBLIC	Sustainability outcomes	1, 2

## What are the primary methods that your organisation has used to determine the most important intended and unintended sustainability outcomes connected to its investment activities?

(A) Identify sustainability outcomes that are closely linked to our core investment activities

 $\Box$  (B) Consult with key clients and/or beneficiaries to align with their priorities

☑ (C) Assess which actual or potential negative outcomes for people are most severe based on their scale, scope, and irremediable character

(D) Identify sustainability outcomes that are closely linked to systematic sustainability issues

(E) Analyse the input from different stakeholders (e.g. affected communities, civil society, trade unions or similar)

☑ (F) Understand the geographical relevance of specific sustainability outcome objectives

□ (G) Other method

• (H) We have not yet determined the most important sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48	CORE	PGS 47.2	PGS 48.1, SO 1	PUBLIC	Sustainability outcomes	1, 2

Has your organisation taken action on any specific sustainability outcomes connected to its investment activities, including to prevent and mitigate actual and potential negative outcomes?

(A) Yes, we have taken action on some of the specific sustainability outcomes connected to our investment activities

 $\circ~$  (B) No, we have not yet taken action on any specific sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48.1	PLUS	PGS 48	N/A	PUBLIC	Sustainability outcomes	1, 2

#### Why has your organisation taken action on specific sustainability outcomes connected to its investment activities?

☑ (A) We believe that taking action on sustainability outcomes is relevant to our financial risks and returns over both short- and long-term horizons

 $\Box$  (B) We believe that taking action on sustainability outcomes, although not yet relevant to our financial risks and returns, will become so over a long-time horizon

 $\Box$  (C) We have been requested to do so by our clients and/or beneficiaries

(D) We want to prepare for and respond to legal and regulatory developments that are increasingly addressing sustainability outcomes

(E) We want to protect our reputation, particularly in the event of negative sustainability outcomes connected to investments

□ (F) We want to enhance our social licence-to-operate (i.e. the trust of beneficiaries, clients, and other stakeholders)

G) We believe that taking action on sustainability outcomes in parallel to financial return goals has merit in its own right

□ (H) Other



### **HUMAN RIGHTS**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49	PLUS	PGS 47	PGS 49.1	PUBLIC	Human rights	1, 2

During the reporting year, what steps did your organisation take to identify and take action on the actual and potentially negative outcomes for people connected to your investment activities?

☑ (A) We assessed the human rights context of our potential and/or existing investments and projected how this could connect our organisation to negative human rights outcomes

Explain how these activities were conducted:

We included assessments of human rights risks into the due diligence processes for our investments, and into the monitoring of our existing investments. The methodologies differ for different asset classes, as for example for listed assets ESG-database -type resources are available, and in non-listed assets such as real estate and forestry, where more hands-on expert assessments are needed.

□ (B) We assessed whether individuals at risk or already affected might be at heightened risk of harm

 $\Box$  (C) We consulted with individuals and groups who were at risk or already affected, their representatives and/or other relevant stakeholders such as human rights experts

☑ (D) We took other steps to assess and manage the actual and potentially negative outcomes for people connected to our investment activities

Specify:

Our forest funds certify all their forest holdings to FSC and /or PEFC sustainable forest management certification that set strict criteria also fore social sustainability. This is done to manage and mitigate any possible negative impacts of the forestry activities on people. In our forestry funds we report future forest management activities to local neighbors and stakeholders in advance, so that if they wish, they can contact us and discuss the potential impacts.

Explain how these activities were conducted:

As part of complying with the regulatory, FSC and PEFC certification criteria on social impacts, for example the information regarding forest management activities is published in a public web portal in advance, and the local neighbors and stakeholders can contact United Bankers if they wish to discuss any potential impacts.

• (E) We did not identify and take action on the actual and potentially negative outcomes for people connected to any of our investment activities during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.1	PLUS	PGS 49	N/A	PUBLIC	Human rights	1, 2

During the reporting year, which stakeholder groups did your organisation include when identifying and taking action on the actual and potentially negative outcomes for people connected to your investment activities?

□ (A) Workers

**(B)** Communities

Sector(s) for which each stakeholder group was included

- □ (1) Energy
- ☑ (2) Materials
- □ (3) Industrials
- $\Box$  (4) Consumer discretionary
- $\Box$  (5) Consumer staples
- $\Box$  (6) Healthcare



(9) Communication services<br/>(10) Utilities<br/>(11) Real estate<br/>(11) R

#### ☑ (A) Corporate disclosures

□ (7) Finance

 $\Box$  (8) Information technology

Provide further detail on how your organisation used these information sources:

Used together with other materials in due diligence and in portolio monitoring for non-listed listed assets

#### (B) Media reports

Provide further detail on how your organisation used these information sources:

Used together with other materials in due diligence and in portolio monitoring for non-listed listed assets

#### $\blacksquare$ (C) Reports and other information from NGOs and human rights institutions

Provide further detail on how your organisation used these information sources:

Used together with other materials in due diligence and in portolio monitoring for non-listed listed assets

#### ☑ (D) Country reports, for example, by multilateral institutions, e.g. OECD, World Bank Provide further detail on how your organisation used these information sources:

Used together with other materials in due diligence and in portolio monitoring for non-listed listed assets

#### (E) Data provider scores or benchmarks

Provide further detail on how your organisation used these information sources:

Sustainalytics & Morningstar ESG-database was used in due diligence and in portolio monitoring of listed assets

- $\Box$  (F) Human rights violation alerts
- $\Box$  (G) Sell-side research
- $\Box$  (H) Investor networks or other investors
- $\Box$  (I) Information provided directly by affected stakeholders or their representatives
- $\Box$  (J) Social media analysis
- □ (K) Other

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 50	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

## During the reporting year, did your organisation, directly or through influence over investees, enable access to remedy for people affected by negative human rights outcomes connected to your investment activities?

 $\Box$  (A) Yes, we enabled access to remedy directly for people affected by negative human rights outcomes we caused or contributed to through our investment activities



#### (B) Yes, we used our influence to ensure that our investees provided access to remedies for people affected by negative human rights outcomes we were linked to through our investment activities Describe:

In 2023, United Bankers opened its whistleblowing channel in compliance with UNGP. In case of detecting for example UNGP breaches that would indicate potential negative human rights outcomes, we would seek to initiate engagement or dialogue with the investee in question and push for ensuring access to remedy. However, in 2023 we didn't detect such UNGP breaches in our portfolio monitoring.

• (C) No, we did not enable access to remedy directly, or through the use of influence over investees, for people affected by negative human rights outcomes connected to our investment activities during the reporting year



# LISTED EQUITY (LE)

## **OVERALL APPROACH**

### **MATERIALITY ANALYSIS**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 1	CORE	OO 21	N/A	PUBLIC	Materiality analysis	1
Does your orga listed equity st	anisation have a forma trategies?	l investment proce	ess to identify a	nd incorporate	e material ESG factors	across your
		(2) Activ	e - quantitative		(3) Active - fundar	nental
	investment process material governance	(1) for	all of our AUM		(1) for all of our A	AUM
incorporates	investment process material al and social factors	(1) for	all of our AUM		(1) for all of our A	AUM
incorporates	investment process material ESG factors organisation's average olding period	(1) for	all of our AUM		(1) for all of our A	AUM
process. Our	s identify material ESG		0		O	
informal proc	o not have a formal or cess to identify and naterial ESG factors		0		O	



### **MONITORING ESG TRENDS**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 2	CORE	00 21	N/A	PUBLIC	Monitoring ESG trends	1
• •	Does your organisation have a formal process for monitoring and reviewing the implications of changing ESG trends across your listed equity strategies?					
		(2) Activ	ve - quantitative	)	(3) Active - fundan	nental
	ave a formal process scenario analyses					
• •	ave a formal process, t include scenario	(1) for	all of our AUM		(1) for all of our A	UM
process for ou strategies; ou professionals	t have a formal ur listed equity r investment monitor how ESG ver time at their	o			o	
· · ·	t monitor and review ns of changing ESG listed equity		0		0	



### **PRE-INVESTMENT**

### **ESG INCORPORATION IN RESEARCH**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle	
LE 3	CORE	00 21	N/A	PUBLIC	ESG incorporation in research	1	
How does your	How does your financial analysis and equity valuation or security rating process incorporate m						
		(1) Activ	ve - quantitative	•	(2) Active - fundam	iental	
governance-r financial anal	oorate material elated risks into our ysis and equity ecurity rating process	(1)	in all cases		(1) in all cases		
environmenta our financial a	oorate material I and social risks into analysis and equity ecurity rating process	(1) in all cases			(1) in all cases		
environmenta related to con chains into ou	porate material Il and social risks npanies' supply Ir financial analysis Iuation or security S	(1) in all cases			(1) in all cases		
ESG risks into	t incorporate material o our financial ity valuation or g processes	ο			0		



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 4	CORE	00 21	N/A	PUBLIC	ESG incorporation in research	1

What information do you incorporate when you assess the ESG performance of companies in your financial analysis, benchmark selection and/or portfolio construction process?

	(2) Active - quantitative	(3) Active - fundamental
(A) We incorporate qualitative and/or quantitative information on current performance across a range of material ESG factors	(1) in all cases	(1) in all cases
(B) We incorporate qualitative and/or quantitative information on historical performance across a range of material ESG factors	(1) in all cases	(1) in all cases
(C) We incorporate qualitative and/or quantitative information on material ESG factors that may impact or influence future corporate revenues and/or profitability	(1) in all cases	(1) in all cases
(D) We incorporate qualitative and/or quantitative information enabling current, historical and/or future performance comparison within a selected peer group across a range of material ESG factors	(1) in all cases	(1) in all cases
(E) We do not incorporate qualitative or quantitative information on material ESG factors when assessing the ESG performance of companies in our financial analysis, equity investment or portfolio construction process	o	O



### ESG INCORPORATION IN PORTFOLIO CONSTRUCTION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 6	CORE	00 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1
How do materia process?	al ESG factors contribu	ute to your stock s	selection, portfe	olio constructio	on and/or benchmark s	election
		(2) Activ	ve - quantitative		(3) Active - fundam	nental
to the selection and/or sector portfolio cons	ESG factors contribute on of individual assets r weightings within our struction and/or election process	(1) for	all of our AUM		(1) for all of our A	UM
to the portfoli individual ass portfolio cons	(B) Material ESG factors contribute to the portfolio weighting of individual assets within our portfolio construction and/or benchmark selection process		(1) for all of our AUM		(1) for all of our AUM	
to the country of assets with	ESG factors contribute y or region weighting hin our portfolio and/or benchmark cess	(1) for all of our AUM		(1) for all of our AUM		UM
(D) Other ways material ESG factors contribute to your portfolio construction and/or benchmark selection process						
(E) Our stock selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors			0		0	



### **POST-INVESTMENT**

### ESG RISK MANAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 9	CORE	OO 17.1 LE, OO 21	N/A	PUBLIC	ESG risk management	1

What compliance processes do you have in place to ensure that your listed equity assets subject to negative exclusionary screens meet the screening criteria?

☑ (A) We have internal compliance procedures that ensure all funds or portfolios that are subject to negative exclusionary screening have pre-trade checks

 $\Box$  (B) We have an external committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening

☑ (C) We have an independent internal committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening

• (D) We do not have compliance processes in place to ensure that we meet our stated negative exclusionary screens

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 10	CORE	00 21	N/A	PUBLIC	ESG risk management	1

For the majority of your listed equity assets, do you have a formal process to identify and incorporate material ESG risks and ESG incidents into your risk management process?

	(1) Active - quantitative	(2) Active - fundamental
(A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual listed equity holdings	<b>I</b>	
(B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for other listed equity holdings exposed to similar risks and/or incidents		



(C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for our stewardship activities		
(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents		
(E) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process; our investment professionals identify and incorporate material ESG risks and ESG incidents at their discretion	0	ο
(F) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process	O	O

### **DISCLOSURE OF ESG SCREENS**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 12	CORE	OO 17 LE, OO 21	N/A	PUBLIC	Disclosure of ESG screens	6

For all your listed equity assets subject to ESG screens, how do you ensure that clients understand ESG screens and their implications?

☑ (A) We share a list of ESG screens

☑ (B) We share any changes in ESG screens

☑ (C) We explain any implications of ESG screens, such as their deviation from a benchmark or impact on sector weightings

• (D) We do not share the above information for all our listed equity assets subject to ESG screens



# **REAL ESTATE (RE)**

### POLICY

### **INVESTMENT GUIDELINES**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 1	CORE	OO 21, OO 24, OO 26	N/A	PUBLIC	Investment guidelines	1 to 6

What real estate-specific ESG guidelines are currently covered in your organisation's responsible investment policy(ies)?

(A) Guidelines on our ESG approach to real estate depending on use (e.g. retail and education) and geography

- ☑ (B) Guidelines on our ESG approach to new construction
- ☑ (D) Guidelines on our ESG approach to standing real estate investments
- (E) Guidelines on pre-investment screening

□ (F) Guidelines on our approach to ESG integration into short-term or 100-day plans (or equivalent)

☑ (G) Guidelines on our approach to ESG integration into long-term value creation efforts

- (H) Guidelines on our approach to ESG reporting
- (I) Guidelines on our engagement approach related to third-party property managers
- ☑ (J) Guidelines on our engagement approach related to tenants
- Image: (K) Guidelines on our engagement approach related to construction contractors

• (L) Our responsible investment policy(ies) does not cover real estate-specific ESG guidelines

### FUNDRAISING

### **COMMITMENTS TO INVESTORS**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 2	CORE	00 21	N/A	PUBLIC	Commitments to investors	1, 4

For all of the funds that you closed during the reporting year, what type of formal responsible investment commitments did you make in Limited Partnership Agreements (LPAs), side letters, or other constitutive fund documents?

• (A) We incorporated responsible investment commitments in LPAs (or equivalent) as a standard default procedure

• (B) We added responsible investment commitments in LPAs (or equivalent) upon a client's request

• (C) We added responsible investment commitments in side letters upon a client's request

• (D) We did not make any formal responsible investment commitments for the relevant reporting year

• (E) Not applicable; we have not raised funds in the last five years



### **PRE-INVESTMENT**

### MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 3	CORE	00 21	RE 3.1	PUBLIC	Materiality analysis	1

During the reporting year, how did you conduct ESG materiality analysis for your potential real estate investments?

- ${\ensuremath{ \bullet}}$  (A) We assessed ESG materiality for each property, as each case is unique
  - Select from dropdown list:
    - (1) for all of our potential real estate investments
    - $\circ~$  (2) for a majority of our potential real estate investments
    - $\circ~$  (3) for a minority of our potential real estate investments
- (B) We performed a mix of property level and property type or category level ESG materiality analysis
- $\circ~$  (C) We assessed ESG materiality at the property type or category level only
- (D) We did not conduct ESG materiality analysis for our potential real estate investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 3.1	CORE	RE 3	N/A	PUBLIC	Materiality analysis	1

## During the reporting year, what tools, standards and data did you use in your ESG materiality analysis of potential real estate investments?

 $\square$  (A) We used GRI standards to inform our real estate ESG materiality analysis

 $\Box$  (B) We used SASB standards to inform our real estate ESG materiality analysis

(C) We used the UN Sustainable Development Goals (SDGs) to inform our real estate ESG materiality analysis

(D) We used GRESB Materiality Assessment (RC7) or similar to inform our real estate ESG materiality analysis

(E) We used climate disclosures, such as the TCFD recommendations or other climate risk and/or exposure analysis

tools, to inform our real estate ESG materiality analysis

☑ (F) We used the UN Guiding Principles on Business and Human Rights (UNGPs) to inform our real estate ESG materiality analysis

G) We used geopolitical and macro-economic considerations in our real estate ESG materiality analysis

(H) We used green building certifications to inform our real estate ESG materiality analysis

☑ (I) We engaged with the existing owners and/or managers (or developers for new properties) to inform our real estate ESG materiality analysis

□ (J) Other



### **DUE DILIGENCE**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 4	CORE	00 21	N/A	PUBLIC	Due diligence	1

#### During the reporting year, how did material ESG factors influence your selection of real estate investments?

#### ☑ (A) Material ESG factors were used to identify risks

#### Select from dropdown list:

- (1) for all of our potential real estate investments
- $\circ~$  (2) for a majority of our potential real estate investments
- (3) for a minority of our potential real estate investments
- Image: (B) Material ESG factors were discussed by the investment committee (or equivalent)

#### Select from dropdown list:

- (1) for all of our potential real estate investments
- (2) for a majority of our potential real estate investments
- (3) for a minority of our potential real estate investments

#### ☑ (C) Material ESG factors were used to identify remedial actions for our 100-day plans (or equivalent)

#### Select from dropdown list:

- (1) for all of our potential real estate investments
- (2) for a majority of our potential real estate investments
- (3) for a minority of our potential real estate investments
- $\blacksquare$  (D) Material ESG factors were used to identify opportunities for value creation

#### Select from dropdown list:

- (1) for all of our potential real estate investments
- (2) for a majority of our potential real estate investments
- (3) for a minority of our potential real estate investments

 $\Box$  (E) Material ESG factors informed our decision to abandon potential investments in the due diligence phase in cases where ESG risks were considered too high to mitigate

#### (F) Material ESG factors impacted investments in terms of the price offered and/or paid

Select from dropdown list:

- (1) for all of our potential real estate investments
- (2) for a majority of our potential real estate investments
- (3) for a minority of our potential real estate investments
- (G) Material ESG factors did not influence the selection of our real estate investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 5	CORE	00 21	N/A	PUBLIC	Due diligence	1

## Once material ESG factors have been identified, what processes do you use to conduct due diligence on these factors for potential real estate investments?

(A) We conduct a high-level or desktop review against an ESG checklist for initial red flags

#### Select from dropdown list:

- (1) for all of our potential real estate investments
- (2) for a majority of our potential real estate investments
- (3) for a minority of our potential real estate investments

#### (B) We send detailed ESG questionnaires to target properties

#### Select from dropdown list:

• (1) for all of our potential real estate investments



- $\circ~$  (2) for a majority of our potential real estate investments
- (3) for a minority of our potential real estate investments
- C) We hire third-party consultants to do technical due diligence on specific material ESG factors Select from dropdown list:
  - (1) for all of our potential real estate investments
  - (2) for a majority of our potential real estate investments
  - (3) for a minority of our potential real estate investments
- ☑ (D) We conduct site visits
- Select from dropdown list:

(1) for all of our potential real estate investments

- $\circ$  (2) for a majority of our potential real estate investments
- (3) for a minority of our potential real estate investments
- (E) We conduct in-depth interviews with management and/or personnel

Select from dropdown list:

- (1) for all of our potential real estate investments
- (2) for a majority of our potential real estate investments
- $\circ$  (3) for a minority of our potential real estate investments
- $\Box$  (F) We conduct detailed external stakeholder analysis and/or engagement
- G (G) We incorporate ESG due diligence findings in all of our relevant investment process documentation in the same manner as for other key due diligence, e.g. commercial, accounting and legal

Select from dropdown list:

- (1) for all of our potential real estate investments
- (2) for a majority of our potential real estate investments
- (3) for a minority of our potential real estate investments
- Image: (H) Our investment committee (or an equivalent decision-making body) is ultimately responsible for ensuring all ESG due diligence is completed in the same manner as for other key due diligence, e.g. commercial, accounting and legal Select from dropdown list:
  - (1) for all of our potential real estate investments
  - (2) for a majority of our potential real estate investments
  - $\circ$  (3) for a minority of our potential real estate investments

□ (I) Other

• (J) We do not conduct due diligence on material ESG factors for potential real estate investments

### SELECTION, APPOINTMENT AND MONITORING OF THIRD-PARTY PROPERTY MANAGERS

### SELECTION PROCESS OF THIRD-PARTY PROPERTY MANAGERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 6	CORE	OO 26	N/A	PUBLIC	Selection process of third-party property managers	1, 4

## During the reporting year, how did you include material ESG factors in all of your selections of third-party property managers?

(A) We requested information from potential third-party property managers on their overall approach to material ESG factors

(B) We requested track records and examples from potential third-party property managers on their management of material ESG factors

☑ (C) We requested information from potential third-party property managers on their engagement process(es) with stakeholders

(D) We requested documentation from potential third-party property managers on their responsible procurement practices, including responsibilities, approach and incentives



(E) We requested the assessment of current and planned availability and aggregation of metering data from potential third-party property managers

□ (F) Other

• (G) We did not include material ESG factors in our selection of third-party property managers

### APPOINTMENT PROCESS OF THIRD-PARTY PROPERTY MANAGERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 7	CORE	OO 26	N/A	PUBLIC	Appointment process of third-party property managers	1, 4

How did you include material ESG factors when appointing your current third-party property managers?

- $\blacksquare$  (A) We set dedicated ESG procedures in all relevant property management phases
  - Select from dropdown list:
    - (1) for all of our third-party property managers
    - (2) for a majority of our third-party property managers
    - (3) for a minority of our third-party property managers
- **(B)** We set clear ESG reporting requirements
- Select from dropdown list:
  - (1) for all of our third-party property managers
  - $\circ~$  (2) for a majority of our third-party property managers
  - $\circ~$  (3) for a minority of our third-party property managers
- IC) We set clear targets on material ESG factors
  - Select from dropdown list:
    - $\circ$  (1) for all of our third-party property managers
    - (2) for a majority of our third-party property managers
    - (3) for a minority of our third-party property managers
- $\Box$  (D) We set incentives related to targets on material ESG factors
- (E) We included responsible investment clauses in property management contracts
  - Select from dropdown list:
    - (1) for all of our third-party property managers
    - (2) for a majority of our third-party property managers
    - $\circ~$  (3) for a minority of our third-party property managers
- □ (F) Other

• (G) We did not include material ESG factors in the appointment of third-party property managers

### MONITORING PROCESS OF THIRD-PARTY PROPERTY MANAGERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 8	CORE	OO 26	N/A	PUBLIC	Monitoring process of third-party property managers	1, 4

#### How do you include material ESG factors when monitoring current third-party property managers?

(A) We monitor the performance of quantitative and/or qualitative targets on material environmental factors Select from dropdown list:

#### • (1) for all of our third-party property managers

- $\circ~$  (2) for a majority of our third-party property managers
- $\circ$  (3) for a minority of our third-party property managers



#### (B) We monitor the performance of quantitative and/or qualitative targets on material social factors Select from dropdown list:

- (1) for all of our third-party property managers
- $\circ~$  (2) for a majority of our third-party property managers
- (3) for a minority of our third-party property managers

#### C) We monitor the performance of quantitative and/or qualitative targets on material governance factors Select from dropdown list:

- (1) for all of our third-party property managers
- (2) for a majority of our third-party property managers
- (3) for a minority of our third-party property managers
- (D) We monitor progress reports on engagement with tenants
- Select from dropdown list:
  - (1) for all of our third-party property managers
  - $\circ~$  (2) for a majority of our third-party property managers
  - $\circ$  (3) for a minority of our third-party property managers
- (E) We require formal reporting at least yearly

Select from dropdown list:

- (1) for all of our third-party property managers
- $\circ$  (2) for a majority of our third-party property managers
- (3) for a minority of our third-party property managers
- □ (F) We have discussions about material ESG factors with all relevant stakeholders at least yearly

 $\Box$  (G) We conduct a performance review of third-party property managers against targets on material ESG factors and/or a financial incentive structure linked to material ESG factors

(H) We have internal or external parties conduct site visits at least yearly

Select from dropdown list:

(1) for all of our third-party property managers

- $\circ~$  (2) for a majority of our third-party property managers
- (3) for a minority of our third-party property managers

□ (I) Other

• (J) We do not include material ESG factors in the monitoring of third-party property managers

### **CONSTRUCTION AND DEVELOPMENT**

### **CONSTRUCTION REQUIREMENTS**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 9	CORE	00 24	N/A	PUBLIC	Construction requirements	1

#### What ESG requirements do you currently have in place for all development projects and major renovations?

(A) We require the management of waste by diverting materials (e.g. from construction and demolition, reusable vegetation, rocks and soil) from disposal

(B) We require the minimisation of light and noise pollution that would affect the surrounding community

(C) We require the performance of an environmental and social site impact assessment

☑ (D) We require the protection of the air quality during construction

(E) We require the protection and restoration of the habitat and soils disturbed during construction and/or during previous development

☑ (F) We require the protection of surface water, groundwater and aquatic ecosystems by controlling and retaining construction pollutants

(G) We require constant monitoring of health and safety at the construction site

 $\Box$  (H) We require engagement with local communities and other stakeholders during the design and/or planning process  $\Box$  (I) Other

• (J) We do not have ESG requirements in place for development projects and major renovations



### MINIMUM BUILDING REQUIREMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 10	CORE	00 24	N/A	PUBLIC	Minimum building requirements	1

What minimum building requirements do you have in place for development projects and major renovations?

☑ (A) We require the implementation of the latest available metering and internet of things (IoT) technology Select from dropdown list:

(1) for all development projects and major renovations

- $\circ$  (2) for a majority of our development projects and major renovations
- $\circ$  (3) for a minority of our development projects and major renovations

(B) We require the building to be able to obtain a recognised green and/or healthy building certification for new buildings

Select from dropdown list:

- (1) for all development projects and major renovations
- (2) for a majority of our development projects and major renovations
- (3) for a minority of our development projects and major renovations
- (C) We require the use of certified (or labelled) sustainable building materials

Select from dropdown list:

- $\circ~$  (1) for all development projects and major renovations
- (2) for a majority of our development projects and major renovations
- $\circ$  (3) for a minority of our development projects and major renovations
- ☑ (D) We require the installation of renewable energy technologies where feasible

Select from dropdown list:

- (1) for all development projects and major renovations
- (2) for a majority of our development projects and major renovations
- $\circ$  (3) for a minority of our development projects and major renovations

 $\Box$  (E) We require that development projects and major renovations become net-zero carbon emitters within five years of completion of the construction

- $\Box$  (F) We require water conservation measures
- G) We require common health and well-being measures for occupants

Select from dropdown list:

#### (1) for all development projects and major renovations

- (2) for a majority of our development projects and major renovations
- $\circ$  (3) for a minority of our development projects and major renovations

□ (H) Other

• (I) We do not have minimum building requirements in place for development projects and major renovations



### **POST-INVESTMENT**

### MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 11	CORE	00 21	RE 11.1	PUBLIC	Monitoring	1

During the reporting year, did you track one or more KPIs on material ESG factors across your real estate investments?

#### ☑ (A) Yes, we tracked KPIs on environmental factors

```
Percentage of real estate assets this applies to:
```

- (1) >0 to 10%
- (2) >10 to 50%
- (3) >50 to 75%
- (4) >75 to 95%
- (5) >95%

#### (B) Yes, we tracked KPIs on social factors

Percentage of real estate assets this applies to:

- (1) >0 to 10%
- (2) >10 to 50%
- (3) >50 to 75%
- (4) >75 to 95%
- (5) >95%

#### ☑ (C) Yes, we tracked KPIs on governance factors

Percentage of real estate assets this applies to:

- (1) >0 to 10%
- (2) >10 to 50%
- (3) >50 to 75%
- (4) >75 to 95%
- (5) >95%
- $\circ$  (D) We did not track KPIs on material ESG factors across our real estate investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 12	CORE	00 21	N/A	PUBLIC	Monitoring	1

#### During the reporting year, what ESG building performance data did you collect for your real estate assets?

#### ☑ (A) Energy consumption

Select from dropdown list:

- (1) for all of our real estate assets
- (2) for a majority of our real estate assets
- (3) for a minority of our real estate assets

#### ☑ (B) Water consumption

#### Select from dropdown list:

- (1) for all of our real estate assets
- (2) for a majority of our real estate assets
- (3) for a minority of our real estate assets

#### ☑ (C) Waste production

Select from dropdown list:

- (1) for all of our real estate assets
- (2) for a majority of our real estate assets



#### • (3) for a minority of our real estate assets

(D) Other

Specify:

Renewable Energy Usage

Select from dropdown list:

- (1) for all of our real estate assets
- $\circ~$  (2) for a majority of our real estate assets
- (3) for a minority of our real estate assets

 $\circ$  (E) We did not collect ESG building performance data for our real estate assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 13	CORE	OO 21, OO 26	RE 13.1	PUBLIC	Monitoring	1, 2

## What processes do you have in place to support meeting your targets on material ESG factors for your real estate investments?

☑ (A) We use operational-level benchmarks to assess and analyse the performance of assets against sector performance

Select from dropdown list:

- (1) for all of our real estate assets
- (2) for a majority of our real estate assets
- (3) for a minority of our real estate assets
- □ (B) We implement certified environmental and social management systems across our portfolio
- ☑ (C) We make sufficient budget available to ensure that the systems and procedures needed are established Select from dropdown list:

  - (1) for all of our real estate assets
  - (2) for a majority of our real estate assets
  - $\circ$  (3) for a minority of our real estate assets
- $\square$  (D) We hire external verification services to audit performance, systems, and procedures
- (E) We collaborate and engage with our third-party property managers and/or tenants to develop action plans

Select from dropdown list:

- (1) for all of our real estate assets
- $\circ$  (2) for a majority of our real estate assets
- $\circ$  (3) for a minority of our real estate assets

#### ☑ (F) We develop minimum health and safety standards

Select from dropdown list:

• (1) for all of our real estate assets

- $\circ$  (2) for a majority of our real estate assets
- $\circ~$  (3) for a minority of our real estate assets

G) We conduct ongoing engagement with all key stakeholders, e.g. local communities, NGOs, governments, and endusers

Select from dropdown list:

- (1) for all of our real estate assets
- (2) for a majority of our real estate assets
- (3) for a minority of our real estate assets
- □ (H) Other

• (I) We do not have processes in place to help meet our targets on material ESG factors for our real estate investments



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 14	CORE	OO 21	N/A	PUBLIC	Monitoring	1, 2

Post-investment, how do you manage material ESG risks and ESG opportunities to create value during the holding period?

☑ (A) We develop property-specific ESG action plans based on pre-investment research, due diligence and materiality findings

Select from dropdown list:

- (1) for all of our real estate investments
- (2) for a majority of our real estate investments
- $\circ$  (3) for a minority of our real estate investments
- (B) We adjust our ESG action plans based on performance monitoring findings at least yearly
  - Select from dropdown list:
    - (1) for all of our real estate investments
    - $\circ~$  (2) for a majority of our real estate investments
    - (3) for a minority of our real estate investments

☑ (C) We, or the external advisors that we hire, support our real estate investments with specific ESG value-creation opportunities

Select from dropdown list:

- (1) for all of our real estate investments
- $\circ~$  (2) for a majority of our real estate investments
- $\circ$  (3) for a minority of our real estate investments

□ (D) Other

• (E) We do not manage material ESG risks and opportunities post-investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 17	CORE	00 21	N/A	PUBLIC	Monitoring	1

#### What proportion of your real estate assets has obtained a green or sustainable building certification?

• (A) All of our real estate assets have obtained a green or sustainable building certification

- (B) A majority of our real estate assets have obtained a green or sustainable building certification
- (C) A minority of our real estate assets have obtained a green or sustainable building certification
- (D) None of our real estate assets have obtained a green or sustainable building certification

### STAKEHOLDER ENGAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 18	CORE	00 21	N/A	PUBLIC	Stakeholder engagement	1, 2

#### How does your third-party property manager(s) engage with tenants?

☑ (A) They engage with real estate tenants on energy, water consumption and/or waste production Select from dropdown list:

- (1) for all of our buildings or properties
- (2) for a majority of our buildings or properties
- (3) for a minority of our buildings or properties



## (B) They engage with real estate tenants by organising tenant events focused on increasing sustainability awareness, ESG training and guidance

Select from dropdown list:

- (1) for all of our buildings or properties
- (2) for a majority of our buildings or properties
- $\circ$  (3) for a minority of our buildings or properties

(C) They engage with real estate tenants by offering green leases

- Select from dropdown list:
  - (1) for all of our buildings or properties
  - $\circ~$  (2) for a majority of our buildings or properties
  - $\circ$  (3) for a minority of our buildings or properties

☑ (D) They engage with real estate tenants by identifying collaboration opportunities that support targets related to material ESG factors

#### Select from dropdown list:

- $\circ$  (1) for all of our buildings or properties
- (2) for a majority of our buildings or properties
- (3) for a minority of our buildings or properties
- (E) They engage with real estate tenants by offering shared financial benefits from equipment upgrades

Select from dropdown list:

- $\circ~$  (1) for all of our buildings or properties
- (2) for a majority of our buildings or properties
- $\circ~$  (3) for a minority of our buildings or properties

 $\Box$  (F) Other

 $\circ~$  (G) Our third-party property manager(s) do not engage with tenants

### EXIT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 20	CORE	00 21	N/A	PUBLIC	Exit	4, 6

## During the reporting year, what responsible investment information was shared with potential buyers of real estate investments?

(A) Our firm's high-level commitment to responsible investment, e.g. that we are a PRI signatory

- Select from dropdown list:
  - (1) for all of our real estate investments
  - (2) for a majority of our real estate investments
  - (3) for a minority of our real estate investments

(B) A description of what industry and asset class standards our firm aligns with, e.g. TCFD or GRESB Select from dropdown list:

#### • (1) for all of our real estate investments

- (2) for a majority of our real estate investments
- (3) for a minority of our real estate investments

☑ (C) Our firm's responsible investment policy (at minimum, a summary of key aspects and firm-specific approach) Select from dropdown list:

- (1) for all of our real estate investments
- $\circ$  (2) for a majority of our real estate investments
- $\circ$  (3) for a minority of our real estate investments
- □ (D) Our firm's ESG risk assessment methodology (topics covered in-house and/or with external support)
- $\Box$  (E) The outcome of our latest ESG risk assessment of the property(s)
- ☑ (F) Key ESG performance data on the property(s) being sold

Select from dropdown list:

- (1) for all of our real estate investments
- $\circ$  (2) for a majority of our real estate investments
- $\circ~$  (3) for a minority of our real estate investments

□ (G) Other



 $\circ$  (H) No responsible investment information was shared with potential buyers of real estate investments during the reporting year

• (I) Not applicable; we had no sales process (or control over the sales process) during the reporting year

### DISCLOSURE OF ESG PORTFOLIO INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 21	CORE	00 21	N/A	PUBLIC	Disclosure of ESG portfolio information	6

During the reporting year, how did you report on your targets on material ESG factors and related data to your investors?

☑ (A) We reported through a publicly disclosed sustainability report

(B) We reported in aggregate through formal reporting to investors

 $\Box$  (C) We reported at the property level through formal reporting to investors

 $\Box$  (D) We reported through a limited partners advisory committee (or equivalent)

 $\Box$  (E) We reported at digital or physical events or meetings with investors

 $\Box$  (F) We had a process in place to ensure that serious ESG incidents were reported

□ (G) Other

• (H) We did not report our targets on material ESG factors and related data to our investors during the reporting year



# **CONFIDENCE-BUILDING MEASURES (CBM)**

### **CONFIDENCE-BUILDING MEASURES**

### APPROACH TO CONFIDENCE-BUILDING MEASURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 1	CORE	N/A	Multiple indicators	PUBLIC	Approach to confidence-building measures	6

#### How did your organisation verify the information submitted in your PRI report this reporting year?

□ (A) We conducted independent third-party assurance of selected processes and/or data related to the responsible investment processes reported in our PRI report, which resulted in a formal assurance conclusion

 $\Box$  (B) We conducted a third-party readiness review and are making changes to our internal controls or governance processes to be able to conduct independent third-party assurance next year

□ (C) We conducted an internal audit of selected processes and/or data related to the responsible investment processes reported in our PRI report

## ☑ (D) Our board, trustees (or equivalent), senior executive-level staff (or equivalent), and/or investment committee (or equivalent) signed off on our PRI report

 $\Box$  (E) We conducted an external ESG audit of our holdings to verify that our funds comply with our responsible investment policy  $\Box$  (F) We conducted an external ESG audit of our holdings as part of risk management, engagement identification or investment decision-making

G) Our responses in selected sections and/or the entirety of our PRI report were internally reviewed before submission to the PRI

 $\circ$  (H) We did not verify the information submitted in our PRI report this reporting year

### **INTERNAL REVIEW**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 6	CORE	CBM 1	N/A	PUBLIC	Internal review	6

#### Who in your organisation reviewed the responses submitted in your PRI report this year?

 $\Box$  (A) Board, trustees, or equivalent

(B) Senior executive-level staff, investment committee, head of department, or equivalent

Sections of PRI report reviewed

#### • (1) the entire report

• (2) selected sections of the report

• (C) None of the above internal roles reviewed selected sections or the entirety of the responses submitted in our PRI report this year

