



| LEA 02  | Discipline: Mandatory  | Principle: PRI 1, 2, 3 |
|---|--|------------------------|
| <p><b>Type of engagement</b></p> <p>Individual/ internal staff engagements</p> <p>Collaborative engagements</p> <p>Service provider engagements</p> | <p><b>Reason for interaction</b></p> <p><input checked="" type="checkbox"/> To support investment decision-making in &amp; company's material ESG issues</p> <p><input checked="" type="checkbox"/> To enhance corporate transparency or identify the need for additional or more data on material ESG issues</p> <p><input type="checkbox"/> Other: specify</p> <p><input type="checkbox"/> We do not engage in internal staff</p> <p><input type="checkbox"/> To support investment decision-making in &amp; company's material ESG issues</p> <p><input type="checkbox"/> To enhance corporate transparency or identify the need for additional or more data on material ESG issues</p> <p><input type="checkbox"/> Other: specify</p> <p><input type="checkbox"/> We do not engage in collaborative engagements</p> <p><input type="checkbox"/> To support investment decision-making in &amp; company's material ESG issues</p> <p><input type="checkbox"/> To enhance corporate transparency or identify the need for additional or more data on material ESG issues</p> <p><input type="checkbox"/> Other: specify</p> <p><input type="checkbox"/> We do not engage in service provider engagements</p> |                        |

# RI TRANSPARENCY REPORT

## 2018

Ibercaja Pensión E.G.F.P., S.A.

## About this report

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

This report is an export of the individual Signatory organisation's response to the PRI during the 2018 reporting cycle. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information. As a result, the reports can be extensive. However, to help easily locate information, there is a **Principles index** which highlights where the information can be found and summarises the indicators that signatories complete and disclose.

## Understanding the Principles Index

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

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

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

| Symbol | Status  |
|--------|---|
| ✓      | The signatory has completed all mandatory parts of this indicator |
| ☑      | The signatory has completed some parts of this indicator          |
| 🔒      | This indicator was not relevant for this signatory                |
| -      | The signatory did not complete any part of this indicator         |
| Ⓜ      | The signatory has flagged this indicator for internal review      |

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

# Principles Index

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

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

| Direct - Listed Equity Incorporation |  |        |            | Principle |   |   |   |   |   | General |
|--------------------------------------|--|--------|------------|-----------|---|---|---|---|---|---------|
| Indicator                            | Short description  | Status | Disclosure | 1         | 2 | 3 | 4 | 5 | 6 |         |
| LEI 01                               | Percentage of each incorporation strategy                                    | ✓      | Public     | ✓         |   |   |   |   |   |         |
| LEI 02                               | Type of ESG information used in investment decision                          | ✓      | Private    | ✓         |   |   |   |   |   |         |
| LEI 03                               | Information from engagement and/or voting used in investment decision-making | ✓      | Private    | ✓         |   |   |   |   |   |         |
| LEI 04                               | Types of screening applied   | ✓      | Public     | ✓         |   |   |   |   |   |         |
| LEI 05                               | Processes to ensure screening is based on robust analysis                    | ✓      | Public     | ✓         |   |   |   |   |   |         |
| LEI 06                               | Processes to ensure fund criteria are not breached                           | ✓      | Private    | ✓         |   |   |   |   |   |         |
| LEI 07                               | Types of sustainability thematic funds/mandates                              | 🔒      | n/a        | ✓         |   |   |   |   |   |         |
| LEI 08                               | Review ESG issues while researching companies/sectors                        | ✓      | Public     | ✓         |   |   |   |   |   |         |
| LEI 09                               | Processes to ensure integration is based on robust analysis                  | ✓      | Private    | ✓         |   |   |   |   |   |         |
| LEI 10                               | Aspects of analysis ESG information is integrated into                       | ✓      | Private    | ✓         |   |   |   |   |   |         |
| LEI 11                               | ESG issues in index construction   | 🔒      | n/a        | ✓         |   |   |   |   |   |         |
| LEI 12                               | How ESG incorporation has influenced portfolio composition                   | ✓      | Private    | ✓         |   |   |   |   |   |         |
| LEI 13                               | Measurement of financial and ESG outcomes of ESG incorporation               | ✓      | Private    | ✓         |   |   |   |   |   |         |
| LEI 14                               | Examples of ESG issues that affected your investment view / performance      | ✓      | Private    | ✓         |   |   |   |   |   |         |
| LEI End                              | Module confirmation page   | ✓      | -          |           |   |   |   |   |   |         |

| Direct - Listed Equity Active Ownership |  |        |            | Principle |   |   |   |   |   | General |
|---|--|--------|------------|-----------|---|---|---|---|---|---------|
| Indicator                               | Short description  | Status | Disclosure | 1         | 2 | 3 | 4 | 5 | 6 |         |
| LEA 01                                  | Description of approach to engagement  | ✓      | Public     |           | ✓ |   |   |   |   |         |
| LEA 02                                  | Reasoning for interaction on ESG issues                                      | ✓      | Public     | ✓         | ✓ | ✓ |   |   |   |         |
| LEA 03                                  | Process for identifying and prioritising engagement activities               | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA 04                                  | Objectives for engagement activities   | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA 05                                  | Process for identifying and prioritising collaborative engagement            | ✓      | Public     |           | ✓ |   |   |   |   |         |
| LEA 06                                  | Objectives for engagement activities   | ✓      | Public     |           | ✓ |   |   |   |   |         |
| LEA 07                                  | Role in engagement process   | 🔒      | n/a        |           | ✓ |   | ✓ |   |   |         |
| LEA 08                                  | Monitor / discuss service provider information                               | 🔒      | n/a        |           | ✓ |   |   |   | ✓ |         |
| LEA 09                                  | Share insights from engagements with internal/external managers              | ✓      | Public     | ✓         | ✓ |   |   |   |   |         |
| LEA 10                                  | Tracking number of engagements   | ✓      | Public     |           | ✓ |   |   |   |   |         |
| LEA 11                                  | Number of companies engaged with, intensity of engagement and effort         | ✓      | Private    |           | ✓ |   |   |   |   |         |
| LEA 12                                  | Engagement methods   | ✓      | Private    |           | ✓ |   |   |   |   |         |
| LEA 13                                  | Companies changing practices / behaviour following engagement                | ✓      | Private    |           | ✓ |   |   |   |   |         |
| LEA 14                                  | Examples of ESG engagements  | ✓      | Private    |           | ✓ |   |   |   |   |         |
| LEA 15                                  | Voting policy & approach   | 🔒      | n/a        | ✓         | ✓ | ✓ |   |   |   |         |
| LEA 16                                  | Typical approach to (proxy) voting decisions                                 | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA 17                                  | Percentage of voting recommendations reviewed                                | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA 18                                  | Confirmation of votes  | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA 19                                  | Securities lending programme   | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA 20                                  | Informing companies of the rationale of abstaining/voting against management | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA 21                                  | Percentage of (proxy) votes cast   | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA 22                                  | Proportion of ballot items that were for/against/abstentions                 | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA 23                                  | Shareholder resolutions  | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA 24                                  | Examples of (proxy) voting activities  | 🔒      | n/a        |           | ✓ |   |   |   |   |         |
| LEA End                                 | Module confirmation page   | ✓      | -          |           |   |   |   |   |   |         |

| Direct - Fixed Income |   |        |            | Principle |   |   |   |   |   | General |
|-----------------------|---|--------|------------|-----------|---|---|---|---|---|---------|
| Indicator             | Short description                                     | Status | Disclosure | 1         | 2 | 3 | 4 | 5 | 6 |         |
| FI 01                 | Incorporation strategies applied                      | ✓      | Public     | ✓         |   |   |   |   |   |         |
| FI 02                 | ESG issues and issuer research                        | ✓      | Private    | ✓         |   |   |   |   |   |         |
| FI 03                 | Processes to ensure analysis is robust                | ✓      | Public     | ✓         |   |   |   |   |   |         |
| FI 04                 | Types of screening applied                            | ✓      | Public     | ✓         |   |   |   |   |   |         |
| FI 05                 | Negative screening - overview and rationale           | ✓      | Public     | ✓         |   |   |   |   |   |         |
| FI 06                 | Examples of ESG factors in screening process          | -      | n/a        | ✓         |   |   |   |   |   |         |
| FI 07                 | Screening - ensuring criteria are met                 | ✓      | Public     | ✓         |   |   |   |   |   |         |
| FI 08                 | Thematic investing - overview                         | 🔒      | n/a        | ✓         |   |   |   |   |   |         |
| FI 09                 | Thematic investing - themed bond processes            | 🔒      | n/a        | ✓         |   |   |   |   |   |         |
| FI 10                 | Thematic investing - assessing impact                 | 🔒      | n/a        | ✓         |   |   |   |   |   |         |
| FI 11                 | Integration overview                                  | ✓      | Public     | ✓         |   |   |   |   |   |         |
| FI 12                 | Integration - ESG information in investment processes | ✓      | Public     | ✓         |   |   |   |   |   |         |
| FI 13                 | Integration - E,S and G issues reviewed               | ✓      | Public     | ✓         |   |   |   |   |   |         |
| FI 14                 | ESG incorporation in passive funds                    | 🔒      | n/a        | ✓         |   |   |   |   |   |         |
| FI 15                 | Engagement overview and coverage                      | ✓      | Private    |           | ✓ |   |   |   |   |         |
| FI 16                 | Engagement method                                     | ✓      | Private    | ✓         | ✓ |   |   |   |   |         |
| FI 17                 | Engagement policy disclosure                          | ✓      | Private    | ✓         | ✓ |   |   |   |   |         |
| FI 18                 | Financial/ESG performance                             | ✓      | Private    |           |   |   |   |   |   | ✓       |
| FI 19                 | Examples - ESG incorporation or engagement            | ✓      | Private    | ✓         | ✓ |   |   |   |   |         |
| FI End                | Module confirmation page                              | ✓      | -          |           |   |   |   |   |   |         |

| Assurance        |                                    |        |            | Principle |   |   |   |   |   | General |
|------------------|------------------------------------|--------|------------|-----------|---|---|---|---|---|---------|
| Indicator        | Short description                  | Status | Disclosure | 1         | 2 | 3 | 4 | 5 | 6 |         |
| CM 1 01.1        | Assurance, verification, or review | ✓      | Public     |           |   |   |   |   |   | ✓       |
| CM 1 01.2 & 01.8 | Assurance of this year's PRI data  | ✓      | Public     |           |   |   |   |   |   |         |
| CM 1 01.3 & 01.9 | Assurance of last year's PRI data  | ✓      | Public     |           |   |   |   |   |   | ✓       |
| CM 1 01.4, 10-12 | Other confidence building measures | ✓      | Public     |           |   |   |   |   |   | ✓       |
| CM 1 01.5        | External assurance                 | 🔒      | n/a        |           |   |   |   |   |   | ✓       |
| CM 1 01.6        | Assurance or internal audit        | 🔒      | n/a        |           |   |   |   |   |   | ✓       |
| CM 1 01.7        | Internal verification              | 🔒      | n/a        |           |   |   |   |   |   | ✓       |
| CM 1 01 End      | Module confirmation page           | ✓      | -          |           |   |   |   |   |   |         |

## Basic information

|       |           |        |                 |         |
|-------|-----------|--------|-----------------|---------|
| OO 01 | Mandatory | Public | Gateway/Peering | General |
|-------|-----------|--------|-----------------|---------|

### OO 01.1 Select the services and funds you offer

Fund management

% of assets under management (AUM) in ranges

- <10%
- 10-50%
- >50%

- Fund of funds, manager of managers, sub-advised products
- Other, specify

Further options for investment managers (may be selected in addition to the above)

- Execution and advisory services
- Hedge funds
- Fund of hedge funds

|       |           |        |         |         |
|-------|-----------|--------|---------|---------|
| OO 02 | Mandatory | Public | Peering | General |
|-------|-----------|--------|---------|---------|

### OO 02.1 Select the location of your organisation's headquarters.

Spain

### OO 02.2 Indicate the number of countries in which you have offices (including your headquarters).

- 1
- 2-5
- 6-10
- >10

### OO 02.3 Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).

FTE

26

|       |           |        |             |         |
|-------|-----------|--------|-------------|---------|
| OO 03 | Mandatory | Public | Descriptive | General |
|-------|-----------|--------|-------------|---------|



OO 03.1

Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.

- Yes
- No

OO 04

Mandatory

Public

Gateway/Peering

General

OO 04.1

Indicate the year end date for your reporting year.

31/12/2017

OO 04.2

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

|               | trillions | billions | millions | thousands | hundreds |
|---------------|-----------|----------|----------|-----------|----------|
| Total AUM     |           | 4        | 715      | 582       | 772      |
| Currency      | EUR       |          |          |           |          |
| Assets in USD |           | 5        | 595      | 023       | 710      |

OO 04.5

Additional information. [Optional]

We do not consider AUM the liabilities insured (buy-out). We are consigning those assets that actually we have a mandate to manage.

OO 06

Mandatory

Public

Descriptive

General

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

OO 06.1

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

- as percentage breakdown
- as broad ranges

|                | Internally managed (%) | Externally managed (%) |
|----------------|------------------------|------------------------|
| Listed equity  | 10-50%                 | <10%                   |
| Fixed income   | >50%                   | <10%                   |
| Private equity | 0                      | <10%                   |
| Property       | 0                      | <10%                   |

|                    |      |      |
|--------------------|------|------|
| Infrastructure     | 0    | <10% |
| Commodities        | 0    | <10% |
| Hedge funds        | 0    | <10% |
| Forestry           | 0    | 0    |
| Farmland           | 0    | 0    |
| Inclusive finance  | 0    | 0    |
| Cash               | <10% | 0    |
| Other (1), specify | 0    | 0    |
| Other (2), specify | 0    | 0    |

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

|              |  |               |                |                |
|--------------|--|---------------|----------------|----------------|
| <b>OO 09</b> | <b>Mandatory to Report Voluntary to Disclose</b> | <b>Public</b> | <b>Peering</b> | <b>General</b> |
|--------------|--|---------------|----------------|----------------|

**OO 09.1** Indicate the breakdown of your organisation's AUM by market.

|                                      |  |
|--------------------------------------|--|
| Developed Markets                    | <input type="radio"/> 0%<br><input type="radio"/> <10%<br><input type="radio"/> 10-50%<br><input checked="" type="radio"/> >50 % |
| Emerging, Frontier and Other Markets | <input type="radio"/> 0%<br><input checked="" type="radio"/> <10%<br><input type="radio"/> 10-50%<br><input type="radio"/> >50 % |
| <i>Total</i>                         | <i>100%</i>  |

**Asset class implementation gateway indicators**

|              |                  |               |                |                |
|--------------|------------------|---------------|----------------|----------------|
| <b>OO 10</b> | <b>Mandatory</b> | <b>Public</b> | <b>Gateway</b> | <b>General</b> |
|--------------|------------------|---------------|----------------|----------------|

**OO 10.1** Select the active ownership activities your organisation implemented in the reporting year.

### Listed equity – engagement

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

### Listed equity – voting

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

### OO 10.3

#### Indicate why you do not cast your votes

- Indicate why you do not cast your votes

The company hasn't yet defined a voting policy.

- We do not cast our votes but provide substantive research and voting recommendations to our clients.

### Fixed income SSA – engagement

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

Please explain why you do not engage directly and do not require external managers to engage with companies on ESG factors.

We haven't started any engagement in SSA

### Fixed income Corporate (financial) – engagement

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

Please explain why you do not engage directly and do not require external managers to engage with companies on ESG factors.

We haven't started any engagement in Fixed Income Corporate

### Fixed income Corporate (non-financial) – engagement

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

Fixed income Corporate (securitised) – engagement

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

Please explain why you do not engage directly and do not require external managers to engage with companies on ESG factors.

We haven't started any engagement in Fixed Income Securitised

|       |           |        |         |         |
|-------|-----------|--------|---------|---------|
| OO 11 | Mandatory | Public | Gateway | General |
|-------|-----------|--------|---------|---------|

**OO 11.1** Select the internally managed asset classes in which you addressed ESG incorporation into your investment decisions and/or your active ownership practices (during the reporting year).

Listed equity

- We address ESG incorporation.
- We do not do ESG incorporation.

Fixed income - SSA

- We address ESG incorporation.
- We do not do ESG incorporation.

Fixed income - corporate (financial)

- We address ESG incorporation.
- We do not do ESG incorporation.

Fixed income - corporate (non-financial)

- We address ESG incorporation.
- We do not do ESG incorporation.

Fixed income - securitised

- We address ESG incorporation.
- We do not do ESG incorporation.

Cash

- We address ESG incorporation.
- We do not do ESG incorporation.

| Asset class                              | ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes   |
|--|---|
| Listed equity                            | <p data-bbox="571 342 1474 423">Listed equity - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p data-bbox="571 439 1334 595"> <input type="checkbox"/> We incorporate ESG into our external manager selection process<br/> <input type="checkbox"/> We incorporate ESG into our external manager appointment process<br/> <input type="checkbox"/> We incorporate ESG into our external manager monitoring process<br/> <input checked="" type="checkbox"/> We do not do ESG incorporation         </p>                                |
| Fixed income - SSA                       | <p data-bbox="571 656 1474 736">Fixed income - SSA - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p data-bbox="571 752 1334 909"> <input type="checkbox"/> We incorporate ESG into our external manager selection process<br/> <input type="checkbox"/> We incorporate ESG into our external manager appointment process<br/> <input type="checkbox"/> We incorporate ESG into our external manager monitoring process<br/> <input checked="" type="checkbox"/> We do not do ESG incorporation         </p>                           |
| Fixed income - corporate (financial)     | <p data-bbox="571 969 1474 1072">Fixed income - corporate (financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p data-bbox="571 1088 1334 1245"> <input type="checkbox"/> We incorporate ESG into our external manager selection process<br/> <input type="checkbox"/> We incorporate ESG into our external manager appointment process<br/> <input type="checkbox"/> We incorporate ESG into our external manager monitoring process<br/> <input checked="" type="checkbox"/> We do not do ESG incorporation         </p>      |
| Fixed income - corporate (non-financial) | <p data-bbox="571 1305 1474 1408">Fixed income - corporate (non-financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p data-bbox="571 1424 1334 1581"> <input type="checkbox"/> We incorporate ESG into our external manager selection process<br/> <input type="checkbox"/> We incorporate ESG into our external manager appointment process<br/> <input type="checkbox"/> We incorporate ESG into our external manager monitoring process<br/> <input checked="" type="checkbox"/> We do not do ESG incorporation         </p> |
| Private equity                           | <p data-bbox="571 1653 1474 1733">Private equity - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p data-bbox="571 1749 1334 1906"> <input type="checkbox"/> We incorporate ESG into our external manager selection process<br/> <input type="checkbox"/> We incorporate ESG into our external manager appointment process<br/> <input type="checkbox"/> We incorporate ESG into our external manager monitoring process<br/> <input checked="" type="checkbox"/> We do not do ESG incorporation         </p>                           |
| Property                                 |   |

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

OO 11.3b

If your organisation does not integrate ESG factors into investment decisions on your externally managed assets, explain why not.

The company has begun to implement some socially responsible investment strategies through its direct investment, leaving the external investment for a more advanced phase. In addition, these investments account for a small percentage of total investment.

OO 11.4

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

The company has begun to implement some socially responsible investment strategies through its direct investment, leaving the external investment for a more advanced phase. In addition, these investments account for a small percentage of total investment.

|       |           |        |         |         |
|-------|-----------|--------|---------|---------|
| OO 12 | Mandatory | Public | Gateway | General |
|-------|-----------|--------|---------|---------|

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

**Core modules**

- Organisational Overview
- Strategy and Governance

**RI implementation directly or via service providers**

**Direct - Listed Equity incorporation**

- Listed Equity incorporation

**Direct - Listed Equity active ownership**

- Engagements

**Direct - Fixed Income**

- Fixed income - Corporate (financial)
- Fixed income - Corporate (non-financial)

**RI implementation via external managers**

**Closing module**

- Closing module

**Investment policy**

|       |           |        |               |         |
|-------|-----------|--------|---------------|---------|
| SG 01 | Mandatory | Public | Core Assessed | General |
|-------|-----------|--------|---------------|---------|

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

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

- Yes

**SG 01.2** Indicate the components/types and coverage of your policy.

Select all that apply

| Policy components/types  | Coverage by AUM  |
|--|--|
| <input checked="" type="checkbox"/> Policy setting out your overall approach<br><input type="checkbox"/> Formalised guidelines on environmental factors<br><input type="checkbox"/> Formalised guidelines on social factors<br><input type="checkbox"/> Formalised guidelines on corporate governance factors<br><input type="checkbox"/> Asset class-specific RI guidelines<br><input type="checkbox"/> Sector specific RI guidelines<br><input checked="" type="checkbox"/> Screening / exclusions policy<br><input type="checkbox"/> Engagement policy<br><input type="checkbox"/> (Proxy) voting policy<br><input type="checkbox"/> Other, specify (1)<br><input type="checkbox"/> Other, specify(2) | <input type="radio"/> Applicable policies cover all AUM<br><input checked="" type="radio"/> Applicable policies cover a majority of AUM<br><input type="radio"/> Applicable policies cover a minority of AUM |

**SG 01.3** Indicate if the investment policy covers any of the following

- Your organisation's definition of ESG and/or responsible investment and it's relation to investments
- Your investment objectives that take ESG factors/real economy influence into account
- Time horizon of your investment
- Governance structure of organisational ESG responsibilities
- ESG incorporation approaches
- Active ownership approaches
- Reporting
- Climate change and related issues
- Other RI considerations, specify (1)
- Other RI considerations, specify (2)

**SG 01.4** Describe your organisation's investment principles and overall investment strategy, and how they consider ESG factors and real economy impact.

Ibercaja Pension is an Asset Management Company of individual pensions funds and occupational pension funds whose main target is managing assets in order to obtain the maximum profitability according to predefined investment and risk parameters.

As institutional investors, we are committed to acting in the best long-term interest of our stakeholders and members. Considering this delegated function, we strongly believe that environmental, social, and corporate governance (ESG) issues can affect the performance of investment portfolios ( in different degree depending on companies, sectors, regions, asset classes and timing).

Ibercaja Pension considers that companies with good corporate governance praxis and sustainable practices in social, labor and environmental matters have more possibilities in the long term to survive, progress and create value for the investor. In short, we understand that these aspects have an impact in the risk/reward profile of companies in the long term.

This approach is elaborated in accordance with the CSR model of its parent company Ibercaja Banco, which is a signatory of the United Nations Global Compact Principles on human rights, labor rights, environmental protection and anti-corruption

No



Your responses to this indicator will be used to determine if you meet the minimum requirements of being a PRI signatory introduced for the first time in 2018. Signatories have until 2020 to meet these requirements.

You can find out more information on the PRI website.

There are two minimum requirements for this indicator SG 01.1 and SG 01.2:

- A policy, or similar document, that:Sets out your overall approach to responsible investment; or
- Formalised guidelines on environmental factors; or
- Formalised guidelines on social factors; or
- Formalised guidelines on governance factors.
- 

The PRI recognises that RI "policies" can take many different forms and can have a variety of titles. Please see the explanatory notes for this indicator to see further explanation of this and further guidance.

- This policy/document should cover more than 50% of your AUM

If you have any questions or need support please contact reporting@unpri.org or call on + 44 (0) 203 714 3187.

|       |           |        |               |       |
|-------|-----------|--------|---------------|-------|
| SG 02 | Mandatory | Public | Core Assessed | PRI 6 |
|-------|-----------|--------|---------------|-------|

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

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

- Policy setting out your overall approach

|                |
|----------------|
| URL/Attachment |
|----------------|

- URL

|     |
|-----|
| URL |
|-----|

<https://media.ibercaja.net/ibercaja-es/planes-pensiones/politica-inversion-socialmente-responsable-ibercaja-pension.pdf>

- Attachment (will be made public)

|            |
|------------|
| Attachment |
|------------|

[File 1:Editada Politica de Inversion Socialmente Responsable de Ibercaja Pension 2016.pdf](#)

- Screening / exclusions policy

|                |
|----------------|
| URL/Attachment |
|----------------|

- URL

URL

<https://media.ibercaja.net/ibercaja-es/planes-pensiones/politica-inversion-socialmente-responsable-ibercaja-pension.pdf>

Attachment (will be made public)

Attachment

[File 1:Editada Politica de Inversion Socialmente Responsable de Ibercaja Pension 2016.pdf](#)

We do not publicly disclose our investment policy documents

**SG 02.2**

Indicate if any of your investment policy components are publicly available. Provide URL and an attachment of the document.

Your organisation's definition of ESG and/or responsible investment and it's relation to investments

URL/Attachment

URL

URL

[https://media3.ibercaja.net/planes-pensiones/DPPI\\_Fondos/V78958162\\_PI.pdf](https://media3.ibercaja.net/planes-pensiones/DPPI_Fondos/V78958162_PI.pdf)

Attachment

File Attachment

V78958162\_PI.pdf [463KB]

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

Time horizon of your investment

ESG incorporation approaches

We do not publicly disclose any investment policy components

**SG 02.3**

Indicate if your organisation's investment principles, and overall investment strategy is publicly available

Yes

No

**SG 03**

**Mandatory**

**Public**

**Core Assessed**

**General**

**SG 03.1**

Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.

Yes

**SG 03.2**

Describe your policy on managing potential conflicts of interest in the investment process.

As a regulated pension fund management company we have a legal requirement to act in the best interest of our clients, pension funds and members. Ibercaja Pension follows generally accepted practices to satisfy this legal obligation and avoid conflicts of interest.

With respect to ESG issues, the company does not have a written guide to settle the conflicts of interest related to these issues, but has a SRI Committee that it would be the forum where we will try to solve the case identified.

No

**Objectives and strategies****SG 05****Mandatory****Public****Gateway/Core Assessed****General****SG 05.1**

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

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

**Governance and human resources****SG 07****Mandatory****Public****Core Assessed****General****SG 07.1**

Indicate the roles present in your organisation and for each, indicate whether they have oversight and/or implementation responsibilities for responsible investment.

Roles present in your organisation

- Board members or trustees
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Chief Executive Officer (CEO), Chief Investment Officer (CIO), Investment Committee
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Other Chief-level staff or head of department, specify
- Portfolio managers
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- ESG portfolio manager
- Investment analysts
- Dedicated responsible investment staff
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- External managers or service providers
- Investor relations
- Other role, specify (1)
- Other role, specify (2)

**SG 07.2**

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

We have a SRI Committee which sets the strategic lines of action.

The Quality Manager of the company is the primary responsible of implementing the SRI policy. Among his functions is to provide ESG information to investment managers so they can integrate it into the process of making investment decisions..

The Compliance Department is responsible for monitoring the compliance about the exclusions.

**SG 07.3**

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

Number

1

Your responses to this indicator will be used to determine if you meet the minimum requirements of being a PRI signatory introduced for the first time in 2018. Signatories have until 2020 to meet these requirements.

You can find out more information on the PRI website.

There are two minimum requirements for this indicator SG 07.1:

- A role implementing responsible investment: Individuals with implementation roles are those charged with implementing specific aspects of the organisation's responsible investment practices, for example, conducting ESG-related research, incorporating ESG issues into investment strategies, voting shareholdings, engaging with companies and policy makers;
- This can be an internal staff or an external role;
- They do not have to be a dedicated RI/ESG investment staff (captured in 07.3); and
- They do not have to be allocating the majority of their time to RI/ESG activities.
- 
- Senior level oversight and accountability for RI implementation: Individuals with oversight roles are those with management or governance responsibility for ensuring that the organisation implements its policies, and achieves its objectives and targets in relation to responsible investment performance; and
- "Senior level" includes the roles: Chief level staff, head of department, CEO, CIO, Investment Committee and Board members or trustees.
- 

If you have any questions or need support please contact [reporting@unpri.org](mailto:reporting@unpri.org) or call on + 44 (0) 203 714 3187.

## Promoting responsible investment

SG 09

Mandatory

Public

Core Assessed

PRI 4,5

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

SG 09.1

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

### Select all that apply

Principles for Responsible Investment

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

Basic

Moderate

Advanced

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

We follow the working group documents for our engagement activity (Water Risks in Agricultural Supply Chain).  
 We follow the newsletters like PRI Proxy Voting Updates, PRI Collaborations or PRI Policy  
 We participate in the 2017 Investment Manager Ballot and the PRI survey about megatrends.

- Asian Corporate Governance Association
- Australian Council of Superannuation Investors
- AFIC – La Commission ESG
- BVCA – Responsible Investment Advisory Board
- CDP Climate Change
- CDP Forests
- CDP Water
- CFA Institute Centre for Financial Market Integrity
- Code for Responsible Investment in SA (CRISA)
- Code for Responsible Finance in the 21st Century
- Council of Institutional Investors (CII)
- Eumedion
- Extractive Industries Transparency Initiative (EITI)
- ESG Research Australia
- EVCA – Responsible Investment Roundtable
- Global Investors Governance Network (GIGN)
- Global Impact Investing Network (GIIN)
- Global Real Estate Sustainability Benchmark (GRESB)
- Green Bond Principles
- Institutional Investors Group on Climate Change (IIGCC)
- Interfaith Center on Corporate Responsibility (ICCR)
- International Corporate Governance Network (ICGN)
- Investor Group on Climate Change, Australia/New Zealand (IGCC)
- International Integrated Reporting Council (IIRC)
- Investor Network on Climate Risk (INCR)/CERES
- Local Authority Pension Fund Forum
- Principles for Sustainable Insurance
- Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify SPAINSIF, the Spanish Social Investment Forum.

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

- Basic
- Moderate
- Advanced

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

We usually are involved in its working sessions and seminars, and for Spainsif we organize and support an annually public event in Saragossa. Last one in June about Green Bonds

- Responsible Finance Principles in Inclusive Finance
- Shareholder Association for Research and Education (Share)
- United Nations Environmental Program Finance Initiative (UNEP FI)
- United Nations Global Compact
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify

|       |           |        |               |       |
|-------|-----------|--------|---------------|-------|
| SG 10 | Mandatory | Public | Core Assessed | PRI 4 |
|-------|-----------|--------|---------------|-------|

|         |  |
|---------|--|
| SG 10.1 | Indicate if your organisation promotes responsible investment, independently of collaborative initiatives. |
|---------|--|

- Yes

|         |  |
|---------|--|
| SG 10.2 | Indicate the actions your organisation has taken to promote responsible investment independently of collaborative initiatives. Provide a description of your role in contributing to the objectives of the selected action and the typical frequency of your participation/contribution. |
|---------|--|

- Provided or supported education or training programmes (this includes peer to peer RI support) Your education or training may be for clients, investment managers, actuaries, broker/dealers, investment consultants, legal advisers etc.)
- Provided financial support for academic or industry research on responsible investment
- Provided input and/or collaborated with academia on RI related work
- Encouraged better transparency and disclosure of responsible investment practices across the investment industry

|  |             |
|--|-------------|
|  | Description |
|--|-------------|

Ibercaja Pension was in Spain during 2017 one of the first five Asset Management Companies which reported according to the voluntary reporting model of SRI information for Annual Accounts designed by Spainsif. This model tries to homogenize the information for occupational pension funds to facilitate its comprehension and comparability.

#### Frequency of contribution

- Quarterly or more frequently
  - Biannually
  - Annually
  - Less frequently than annually
  - Ad hoc
  - Other
- Spoke publicly at events and conferences to promote responsible investment

#### Description

In 2017 we participated in a debate at the opening ceremony of the Spainsif's SRI Week in Madrid and we organized a conference about Green Bonds in Saragossa

#### Frequency of contribution

- Quarterly or more frequently
  - Biannually
  - Annually
  - Less frequently than annually
  - Ad hoc
  - Other
- Wrote and published in-house research papers on responsible investment
- Encouraged the adoption of the PRI
- Responded to RI related consultations by non-governmental organisations (OECD, FSB etc.)

#### Description

We participate in:

- PRI survey about megatrends.
- Public consultation of European Commission on institutional investors and asset managers' duties regarding sustainability (in this case, we have participated through our local Asset Management Association "Inverco").

#### Frequency of contribution

- Quarterly or more frequently
  - Biannually
  - Annually
  - Less frequently than annually
  - Ad hoc
  - Other
- Wrote and published articles on responsible investment in the media
- A member of PRI advisory committees/ working groups, specify
- On the Board of, or officially advising, other RI organisations (e.g. local SIFs)



|  |             |
|--|-------------|
|  | Description |
|--|-------------|

Member of the Board of Spainsif until July

|  |                           |
|--|---------------------------|
|  | Frequency of contribution |
|--|---------------------------|

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc
- Other
- Other, specify
- No

|                |   |
|----------------|---|
| <b>SG 10.3</b> | Describe any additional actions and initiatives that your organisation has taken part in during the reporting year to promote responsible investment [Optional] |
|----------------|---|

Ibercaja Pensión has promoted with Spainsif for 5 years (2012-2017) a public conference in Saragossa about its experiences setting up and implementing a SRI policy. The events were open to clients, civil administration, investors, trade unions, students and so.

We have published 2 documents about SRI. One about FAQs intended to the commercial network (Ibercaja Banco) and another intended to customers (URL <https://media.ibercaja.net/ibercaja-es/planes-pensiones/plan-ibercaja-pensiones-sostenible.pdf>). Both documents try to explain what is socially responsible investment and how it applies to our SRI Retail Pension Fund, and finally the document intended to customers provide websites where to get more information about these issues.

### Outsourcing to fiduciary managers and investment consultants

|              |                  |               |                      |              |
|--------------|------------------|---------------|----------------------|--------------|
| <b>SG 12</b> | <b>Mandatory</b> | <b>Public</b> | <b>Core Assessed</b> | <b>PRI 4</b> |
|--------------|------------------|---------------|----------------------|--------------|

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

|                |   |
|----------------|---|
| <b>SG 12.1</b> | Indicate whether your organisation uses investment consultants. |
|----------------|---|

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

### ESG issues in asset allocation

|              |                  |               |                    |              |
|--------------|------------------|---------------|--------------------|--------------|
| <b>SG 13</b> | <b>Mandatory</b> | <b>Public</b> | <b>Descriptive</b> | <b>PRI 1</b> |
|--------------|------------------|---------------|--------------------|--------------|

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

|                |  |
|----------------|--|
| <b>SG 13.1</b> | Indicate if your organisation executes scenario analysis and/or modelling in which the risk profile of future ESG trends at portfolio level is calculated. |
|----------------|--|

- We execute scenario analysis which includes factors representing the investment impacts of future environmental trends
- We execute scenario analysis which includes factors representing the investment impacts of future social trends
- We execute scenario analysis which includes factors representing the investment impacts of future governance trends
- We consider scenario analysis that includes factors representing the investment impacts of future climate-related risks and opportunities
- We execute other scenario analysis, specify
- We do not execute such scenario analysis and/or modelling

|                |                                    |
|----------------|------------------------------------|
| <b>SG 13.3</b> | Additional information. [OPTIONAL] |
|----------------|------------------------------------|

In the current implementation stage of our SRI policy, we use the information to assess individually the SRI profile of the companies.

## Communication

|              |                  |               |                      |              |
|--------------|------------------|---------------|----------------------|--------------|
| <b>SG 19</b> | <b>Mandatory</b> | <b>Public</b> | <b>Core Assessed</b> | <b>PRI 6</b> |
|--------------|------------------|---------------|----------------------|--------------|

|                |   |
|----------------|---|
| <b>SG 19.1</b> | Indicate whether your organisation proactively discloses asset class specific information. Select the frequency of the disclosure to clients/beneficiaries and the public, and provide a URL to the public information. |
|----------------|---|

|  |              |
|--|--------------|
|  | Fixed income |
|--|--------------|

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

|  |   |
|--|---|
| <b>Disclosure to clients/beneficiaries</b> |   |
| Disclosure to clients/beneficiaries        | <input checked="" type="radio"/> Broad approach to RI incorporation<br><input type="radio"/> Detailed explanation of RI incorporation strategy used   |
| Frequency                                  | <input type="checkbox"/> Quarterly<br><input type="checkbox"/> Biannually<br><input type="checkbox"/> Annually<br><input type="checkbox"/> Less frequently than annually<br><input checked="" type="checkbox"/> Ad hoc/when requested |

Listed equity - Engagement

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

|  |   |
|--|---|
| <b>Disclosure to clients/beneficiaries</b> |   |
| Disclosure to clients/beneficiaries        | <input checked="" type="checkbox"/> Details on the overall engagement strategy<br><input type="checkbox"/> Details on the selection of engagement cases and definition of objectives of the selections, priorities and specific goals<br><input type="checkbox"/> Number of engagements undertaken<br><input type="checkbox"/> Breakdown of engagements by type/topic<br><input type="checkbox"/> Breakdown of engagements by region<br><input type="checkbox"/> An assessment of the current status of the progress achieved and outcomes against defined objectives<br><input type="checkbox"/> Examples of engagement cases<br><input type="checkbox"/> Details on eventual escalation strategy taken after the initial dialogue has been unsuccessful (i.e. filing resolutions, issuing a statement, voting against management, divestment etc.)<br><input type="checkbox"/> Details on whether the provided information has been externally assured<br><input type="checkbox"/> Outcomes that have been achieved from the engagement<br><input type="checkbox"/> Other information |
| Frequency                                  | <input type="checkbox"/> Quarterly or more frequently<br><input type="checkbox"/> Biannually<br><input type="checkbox"/> Annually<br><input type="checkbox"/> Less frequently than annually<br><input checked="" type="checkbox"/> Ad-hoc/when requested  |

Listed equity - Incorporation

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

|  |  |
|--|--|
| <b>Disclosure to clients/beneficiaries</b> |  |
| Disclosure to clients/beneficiaries        | <input checked="" type="radio"/> Broad approach to ESG incorporation<br><input type="radio"/> Detailed explanation of ESG incorporation strategy used  |
| Frequency                                  | <input type="checkbox"/> Quarterly or more frequently<br><input type="checkbox"/> Biannually<br><input type="checkbox"/> Annually<br><input type="checkbox"/> Less frequently than annually<br><input checked="" type="checkbox"/> Ad-hoc/when requested |

|                |                                   |
|----------------|-----------------------------------|
| <b>SG 19.2</b> | Additional information [Optional] |
|----------------|-----------------------------------|

We only disclose to clients/beneficiaries in the case of occupational pension funds

## ESG incorporation in actively managed listed equities

### Implementation processes

|               |                  |               |                      |              |
|---------------|------------------|---------------|----------------------|--------------|
| <b>LEI 01</b> | <b>Mandatory</b> | <b>Public</b> | <b>Core Assessed</b> | <b>PRI 1</b> |
|---------------|------------------|---------------|----------------------|--------------|

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

|                 |  |
|-----------------|--|
| <b>LEI 01.1</b> | Indicate (1) which ESG incorporation strategy and/or combination of strategies you apply to your actively managed listed equities and (2) the breakdown of your actively managed listed equities by strategy or combination of strategies (+/- 5%) |
|-----------------|--|

**ESG incorporation strategy (select all that apply)**

- Screening alone (i.e. not combined with any other strategies)
- Thematic alone (i.e. not combined with any other strategies)
- Integration alone (i.e. not combined with any other strategies)
- Screening and integration strategies

|   |     |
|---|-----|
| Percentage of active listed equity to which the strategy is applied | %   |
|   | 100 |

- Thematic and integration strategies
- Screening and thematic strategies
- All three strategies combined
- We do not apply incorporation strategies

Total actively managed listed equities

100%

**LEI 01.2** Describe your organisation's approach to incorporation and the reasons for choosing the particular ESG incorporation strategy/strategies.

The main reasons are the defence of the Institution's values, the aim of protecting our reputation, the assessment of the risks in the companies's profiles we invest in, and the demands of our clients of considering the ESG questions in the investment activity

May include a discussion of the following:

- The main ESG strategies in use, and the motivation for its use.
- Who is responsible for the implementation of these strategies.
- How your ESG incorporation strategies differ (e.g. by sector, geography, etc.).
- If relevant, how combinations of strategies are used.

**LEI 01.3** If assets are managed using a combination of ESG incorporation strategies, briefly describe how these combinations are used. [Optional]

It is a two step approach. First, some companies are excluded of the investable universe due to their controversial activities (100% of listed equity).

Among the investable companies, the asset managers take into account the ESG controversies, ESG profiles or ESG Scoring to have a more complete view of the securities (95,3% of active listed equity ).

**(A) Implementation: Screening**

|               |                  |               |                    |              |
|---------------|------------------|---------------|--------------------|--------------|
| <b>LEI 04</b> | <b>Mandatory</b> | <b>Public</b> | <b>Descriptive</b> | <b>PRI 1</b> |
|---------------|------------------|---------------|--------------------|--------------|

**LEI 04.1** Indicate and describe the type of screening you apply to your internally managed active listed equities.

**Type of screening**

- Negative/exclusionary screening

**Screened by**

- Product
- Activity
- Sector
- Country/geographic region
- Environmental and social practices and performance
- Corporate governance

| Description |
|-------------|
|-------------|

Our exclusion criteria are:

- Controversial weapons as anti-personnel land-mines and cluster munitions. Chemical and biological weapons.
- Nuclear weapons in contravention of the Nuclear Non-Proliferation Treaty

Also, in 2015 we have launched a Pension Fund for the retail market with SRI profile (Ibercaja Sostenible) that expands its scope of exclusion to those companies that have excluded by the sovereign Norwegian Pension Fund for producing damages to the environment or acting against the human and labour rights.

Two of our Occupational Pension Funds have a general weapons exclusion.

Describe which ESG screens are used, for which funds and whether they are used in combination with other screens.

- Positive/best-in-class screening

**Screened by**

- Product
- Activity
- Sector
- Country/geographic region
- Environmental and social practices and performance
- Corporate governance

| Description |
|-------------|
|-------------|

For our retail Pension Fund with SRI profile (Ibercaja Sostenible) we follow some sustainable indexes to determinate the main investment universe. Mainly these indexes are based in best in class strategy.

Describe which ESG screens are used, for which funds and whether they are used in combination with other screens.

- Norms-based screening

| LEI 04.2 | Describe how the screening criteria are established, how often the criteria are reviewed and how you notify clients and/or beneficiaries when changes are made. |
|----------|---|
|----------|---|

The criteria are stated in a formal SRI Policy Statement. These criteria have been designed to be stable over time and have not been amended. The exclusion lists are usually updated quarterly or everytime the source upgrades its data.

We inform of the SRI policy and the activity in the annual report of each occupational pension fund.

|        |           |        |               |       |
|--------|-----------|--------|---------------|-------|
| LEI 05 | Mandatory | Public | Core Assessed | PRI 1 |
|--------|-----------|--------|---------------|-------|

**LEI 05.1** Indicate which processes your organisation uses to ensure screening is based on robust analysis.

- Comprehensive ESG research is undertaken or sourced to determine companies' activities and products.
- Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- External research and data used to identify companies to be excluded/included is subject to internal audit by ESG/RI staff, the internal audit function or similar
- Third-party ESG ratings are updated regularly to ensure that portfolio holdings comply with fund policies.
- A committee or body with representatives independent of the individuals who conduct company research reviews some or all screening decisions
- A periodic review of the quality of the research undertaken or provided is carried out
- Review and evaluation of external research providers
- Other, specify
- None of the above

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

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

**LEI 05.5** Additional information. [Optional]




The process "External research and data used to identify companies to be excluded/included is subject to internal audit by ESG/RI staff, the internal audit function or similar" only applies in the case of the exclusion screening.

### (C) Implementation: Integration of ESG issues

|        |           |        |               |       |
|--------|-----------|--------|---------------|-------|
| LEI 08 | Mandatory | Public | Core Assessed | PRI 1 |
|--------|-----------|--------|---------------|-------|

**LEI 08.1** Indicate which ESG factors you systematically research as part of your investment analysis and the proportion of actively managed listed equity portfolios that is impacted by this analysis.



| ESG issues           | Proportion impacted by analysis   |
|----------------------|---|
| Environmental        |  <p>Environmental</p> <p><input type="radio"/> &lt;10%</p> <p><input checked="" type="radio"/> 10-50%</p> <p><input type="radio"/> 51-90%</p> <p><input type="radio"/> &gt;90%</p>        |
| Social               |  <p>Social</p> <p><input type="radio"/> &lt;10%</p> <p><input checked="" type="radio"/> 10-50%</p> <p><input type="radio"/> 51-90%</p> <p><input type="radio"/> &gt;90%</p>               |
| Corporate Governance |  <p>Corporate Governance</p> <p><input type="radio"/> &lt;10%</p> <p><input checked="" type="radio"/> 10-50%</p> <p><input type="radio"/> 51-90%</p> <p><input type="radio"/> &gt;90%</p> |

**LEI 08.2** Additional information. [Optional]

The manager reviews those ESG aspects that may be relevant in companies, especially in those involved in controversies.

## Engagement

## Overview

LEA 01

Mandatory

Public

Core Assessed

PRI 2

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

**LEA 01.1** Indicate whether your organisation has a formal engagement policy.

- Yes
- No

**LEA 01.6** Additional information [optional]

We follow the engagement activities of the PRI Clearinghouse and specially the initiatives coordinated by the PRI Secretariat.

**LEA 02** **Mandatory** **Public** **Gateway** **PRI 1,2,3**

**LEA 02.1** Indicate the method of engagement, giving reasons for the interaction.

| Type of engagement                           | Reason for interaction  |
|--|---|
| <b>Individual/Internal staff engagements</b> | <input type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues<br><input type="checkbox"/> To encourage improved/increased ESG disclosure<br><input type="checkbox"/> Other, specify<br><input checked="" type="checkbox"/> We do not engage via internal staff<br><div style="background-color: #0070C0; color: white; padding: 5px; margin-top: 10px;">Please specify why your organisation does not engage via internal staff.</div> <p>The size of our organization doesn't allow us to influence in the behavior of companies. The aim of our meetings with companies is to convey our concerns for specific issues, but we do it in an informal way and in any case this activity can be understood as an "engagement" activity</p> |
| <b>Collaborative engagements</b>             | <input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues<br><input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure<br><input type="checkbox"/> Other, specify<br><input type="checkbox"/> We do not engage via collaborative engagements   |
| <b>Service provider engagements</b>          | <input type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues<br><input type="checkbox"/> To encourage improved/increased ESG disclosure<br><input type="checkbox"/> Other, specify<br><input checked="" type="checkbox"/> We do not engage via service providers<br><div style="background-color: #0070C0; color: white; padding: 5px; margin-top: 10px;">Please specify why your organisation does not engage via service providers.</div> <p>In this moment, we trust more in the effectiveness of initiatives by the leading of UNPRI</p>  |

## Process

### Process for engagements conducted via collaborations

|        |           |        |               |       |
|--------|-----------|--------|---------------|-------|
| LEA 05 | Mandatory | Public | Core Assessed | PRI 2 |
|--------|-----------|--------|---------------|-------|

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

**LEA 05.1** Indicate whether your organisation has a formal process for identifying and prioritising collaborative engagements

- Yes
- No

**LEA 05.3** Additional information [Optional]

We follow the engagement activities of the PRI clearinghouse and specially the initiatives coordinated by the PRI. We thought we had to start gradually in the engagement activities and we chose an initiative aligned with our values and SRI policy. Now, we are following an engagement activity: "PRI Water Risks in Agricultural Supply Chains Phase 1". We choose it because the efficient use of water are very relevant issue in our influence area.

|        |           |        |               |       |
|--------|-----------|--------|---------------|-------|
| LEA 06 | Mandatory | Public | Core Assessed | PRI 2 |
|--------|-----------|--------|---------------|-------|

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

**LEA 06.1** Indicate if you define specific objectives for your engagement activities carried out collaboratively.

- Yes
- We do not define specific objectives for engagement activities carried out collaboratively.

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

- Yes
  - Yes, in all cases
  - Yes, in the majority of cases
  - Yes, in the minority of cases
- We do not monitor the actions that companies take following engagement activities carried out collaboratively

**LEA 06.3**

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

- Define timelines for your objectives
- Tracking and/or monitoring progress against defined objectives
- Tracking and or monitoring progress of actions taken when original objectives are not met
- Revisit and, if necessary, revise objectives on continuous basis
- Other, please specify

|  |                   |
|--|-------------------|
|  | other description |
|--|-------------------|

We identify the material issues in relation to the subject of the engagement and we monitor the evolution of the key indicators of the companies

- We do not monitor and evaluate progress of engagement activities carried out by internal staff

May include a discussion of the following;

- How collaborative engagement objectives are defined.
- How progress of collaborative engagement activities are tracked, including how you monitor action taken by companies.
- How the decision to terminate or escalate a collaborative engagement programme or activity is made.
- How insights from collaborative engagement are incorporated into investment decision-making.
- How lessons learned are tracked and integrated into future engagement programmes.
- Any relevant examples.

### General processes for all three groups of engagers

|               |                  |               |                            |                |
|---------------|------------------|---------------|----------------------------|----------------|
| <b>LEA 09</b> | <b>Mandatory</b> | <b>Public</b> | <b>Additional Assessed</b> | <b>PRI 1,2</b> |
|---------------|------------------|---------------|----------------------------|----------------|

**LEA 09.1**

Indicate if insights gained from your engagements are shared with your internal or external investment managers.

| Type of engagement               | Insights shared   |
|----------------------------------|---|
| <b>Collaborative engagements</b> | <input type="radio"/> Yes, systematically<br><input checked="" type="radio"/> Yes, occasionally<br><input type="radio"/> No |

**LEA 09.2**

Additional information. [Optional]

In September, the final draft public disclosure "Benchmark Report of the PRI 2017 Water Risk" was circulated between the group and we shared it with our management team. In March of 2018 was published the Guide for investors on Agricultural Supply Chains "Growing Water Risk Resilience", which we will share in the next weeks with our management team and its conclusions with our clients of the occupational pension funds.

May include a discussion of the following:

- How you decide what information to pass to investment decision-makers.
- What you expect investment decision-makers to do with the insights you pass on.
- How you monitor their use of insights you passed on.
- Whether ESG data collected through engagement feeds into an internal ratings tool/platform.

|        |           |        |         |       |
|--------|-----------|--------|---------|-------|
| LEA 10 | Mandatory | Public | Gateway | PRI 2 |
|--------|-----------|--------|---------|-------|

|                 |   |
|-----------------|---|
| <b>LEA 10.1</b> | Indicate if you track the number of your engagement activities. |
|-----------------|---|

| Type of engagement               | Tracking engagements   |
|----------------------------------|--|
| <b>Collaborative engagements</b> | <input type="radio"/> Yes, we track the number of our engagements in full<br><input checked="" type="radio"/> Yes, we partially track the number of our engagements<br><input type="radio"/> We do not track and cannot estimate our engagements |

May include a discussion of the following:

- The systems in place to track engagement progress.
- A description of the information collected.
- How regularly tracking systems are updated and to whom this information is provided
- Any auditing procedures that occur.

## ESG incorporation in actively managed fixed income

### Implementation processes

|       |           |        |         |       |
|-------|-----------|--------|---------|-------|
| FI 01 | Mandatory | Public | Gateway | PRI 1 |
|-------|-----------|--------|---------|-------|

|                |   |
|----------------|---|
| <b>FI 01.1</b> | Indicate 1) Which ESG incorporation strategy and/or combination of strategies you apply to your actively managed fixed income investments; and 2) The proportion (+/- 5%) of your total actively managed fixed income investments each strategy applies to. |
|----------------|---|

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

|  |                                     |      |
|--|-------------------------------------|------|
|  | Thematic + integration strategies   | 0    |
|  | Screening + thematic strategies     | 0    |
|  | All three strategies combined       | 0    |
|  | No incorporation strategies applied | 0    |
|  |                                     | 100% |

**FI 01.2** Describe your reasons for choosing a particular ESG incorporation strategy and how combinations of strategies are used.

It is a two step approach. First, some companies are excluded of the investable universe due to their controversial activities (100% of corporate).

Among the investable companies, the asset managers take into account the ESG controversies, ESG profiles or ESG Scoring to have a more complete view of the issuers (91,2% of corporate).

|              |                  |               |                            |              |
|--------------|------------------|---------------|----------------------------|--------------|
| <b>FI 03</b> | <b>Mandatory</b> | <b>Public</b> | <b>Additional Assessed</b> | <b>PRI 1</b> |
|--------------|------------------|---------------|----------------------------|--------------|

**FI 03.1** Indicate how you ensure that your ESG research process is robust:

- Issuers are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- Issuer information and/or ESG ratings are updated regularly to ensure ESG research is accurate
- Internal audits of ESG research are undertaken in a systematic way
- ESG analysis is benchmarked for quality against other providers
- Other, specify
- None of the above

**FI 03.2** Describe how your ESG information or analysis is shared among your investment team.

- ESG information is held within a centralised database and is accessible to all investment staff
- ESG information is a standard item on all individual issuer summaries, ‘tear sheets’, ‘dashboards’ or similar documents
- Investment staff are required to discuss ESG information on issuers as a standard item during investment committee meetings
- Records capture how ESG information and research was incorporated into investment decisions
- Other, specify
- None of the above

**(A) Implementation: Screening**

**FI 04** **Mandatory** **Public** **Gateway** **PRI 1**

**FI 04.1** Indicate the type of screening you conduct.

Select all that apply

|                                  | <b>Corporate (financial)</b>        | <b>Corporate (non-financial)</b>    |  |
|----------------------------------|-------------------------------------|-------------------------------------|--|
| Negative/exclusionary screening  | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |  |
| Positive/best-in-class screening | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |  |
| Norms-based screening            | <input type="checkbox"/>            | <input type="checkbox"/>            |  |

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

**Negative/exclusionary screening:**

Our exclusion criteria are: - Controversial weapons as anti-personnel land-mines and cluster munitions. Chemical and biological weapons. - Nuclear weapons in contravention of the Nuclear Non-Proliferation Treaty

Also, in 2015 we have launched a Pension Fund for retail market with SRI profile (Ibercaja Sostenible) that expands its scope of exclusion to those companies/issuers that have been excluded by the sovereign Norwegian Pension Fund for producing damage to the environment or acting against the human and labour rights.

Finally two of our Occupational Pension Funds have a general weapons exclusion.

**Positive/best-in-class screening**

For our retail Pension Fund with SRI profile (Ibercaja Sostenible) we follow some sustainable indexes to determinate the main investable universe. Mainly these indexes are based in best in class strategy.

The exclusion lists are usually updated quarterly. The investable universe based in sustainable indexes is update everytime the index company upgrades its components.

**FI 05** **Mandatory** **Public** **Descriptive** **PRI 1**

**Corporate (financial)**



Corporate (fin)

- For legal reasons
- For non-legal reasons

**Corporate (non-financial)**

Corporate (non-fin)

- For legal reasons
- For non-legal reasons

**FI 05.2** Describe your approach to ESG-based negative screening of issuers from your investable universe.

**For legal reasons**

By Spanish Act 27/2015, 28th July: Controversial weapons as anti-personnel land-mines and cluster munitions

By International treaties signed by Spain: Chemical and biological weapons. - Nuclear weapons in contravention of the Nuclear Non-Proliferation Treaty

**For non-legal reasons**

In 2015 we launched a Pension Fund for retail market with SRI profile (Ibercaja Sostenible) that expands its scope of exclusion to those companies/issuers that have been excluded by the sovereign Norwegian Pension Fund for producing damage to the environment or acting against the human and labour rights.

Finally two of our Occupational Pension Funds have a general weapons exclusion.

|       |           |        |               |       |
|-------|-----------|--------|---------------|-------|
| FI 07 | Mandatory | Public | Core Assessed | PRI 1 |
|-------|-----------|--------|---------------|-------|

**FI 07.1** Indicate which systems your organisation has to ensure that fund screening criteria are not breached in fixed income investments.

| Type of screening                       | Checks   |
|---|--|
| <b>Negative/exclusionary screening?</b> | <input checked="" type="checkbox"/> Checks are performed to ensure that issuers meet screening criteria<br><input type="checkbox"/> We ensure that data used for the screening criteria is updated at least every 2 years.<br><input type="checkbox"/> Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria<br><input type="checkbox"/> Audits of fund holdings are undertaken regularly by internal audit or compliance functions<br><input type="checkbox"/> Other, specify<br><input type="checkbox"/> None of the above |
| <b>Positive/best-in-class screening</b> | <input type="checkbox"/> Checks are performed to ensure that issuers meet screening criteria<br><input type="checkbox"/> We ensure that data used for the screening criteria is updated at least every 2 years.<br><input checked="" type="checkbox"/> Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria<br><input type="checkbox"/> Audits of fund holdings are undertaken regularly by internal audit or compliance functions<br><input type="checkbox"/> Other, specify<br><input type="checkbox"/> None of the above |

### (C) Implementation: Integration

|       |           |        |             |       |
|-------|-----------|--------|-------------|-------|
| FI 11 | Mandatory | Public | Descriptive | PRI 1 |
|-------|-----------|--------|-------------|-------|

|         |  |
|---------|--|
| FI 11.1 | Describe your approach to integrating ESG into traditional financial analysis. |
|---------|--|

First, some companies are excluded of the investable universe due to their controversial activities. Among the investable companies, the asset managers take into account the ESG information about of them to make a better assessment: ESG scoring, level of ESG incidents and ESG profiles of companies and sector reports.

|                       |
|-----------------------|
| Corporate (financial) |
|-----------------------|

In financials we consider more materials the governance, client relation questions and their behaviour in the market.

|                           |
|---------------------------|
| Corporate (non-financial) |
|---------------------------|

Here we consider more materials various issues depending on the industry.

|       |           |        |               |       |
|-------|-----------|--------|---------------|-------|
| FI 12 | Mandatory | Public | Core Assessed | PRI 1 |
|-------|-----------|--------|---------------|-------|

|         |  |
|---------|--|
| FI 12.1 | Indicate how ESG information is typically used as part of your investment process. |
|---------|--|

Select all that apply

|   | Corporate (financial)               | Corporate (non-financial)           |  |
|---|-------------------------------------|-------------------------------------|--|
| ESG analysis is integrated into fundamental analysis                                | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |  |
| ESG analysis is integrated into security weighting decisions                        | <input type="checkbox"/>            | <input type="checkbox"/>            |  |
| ESG analysis is integrated into portfolio construction decisions                    | <input type="checkbox"/>            | <input type="checkbox"/>            |  |
| ESG analysis is a standard part of internal credit ratings or assessment            | <input type="checkbox"/>            | <input type="checkbox"/>            |  |
| ESG analysis for issuers is a standard agenda item at investment committee meetings | <input type="checkbox"/>            | <input type="checkbox"/>            |  |
| ESG analysis is regularly featured in internal research notes or similar            | <input type="checkbox"/>            | <input type="checkbox"/>            |  |
| ESG analysis is a standard feature of ongoing portfolio monitoring                  | <input type="checkbox"/>            | <input type="checkbox"/>            |  |
| ESG analysis features in all internal issuer summaries or similar documents         | <input type="checkbox"/>            | <input type="checkbox"/>            |  |
| Other, specify  | <input type="checkbox"/>            | <input type="checkbox"/>            |  |

|       |           |        |                     |       |
|-------|-----------|--------|---------------------|-------|
| FI 13 | Mandatory | Public | Additional Assessed | PRI 1 |
|-------|-----------|--------|---------------------|-------|

|         |   |
|---------|---|
| FI 13.1 | Indicate the extent to which ESG issues are reviewed in your integration process. |
|---------|---|

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

**Corporate (financial)**

The manager reviews those ESG aspects that may be relevant in every issuer, especially reviews those incidents that we are considered severe. In corporate our greatest concern are the issues of corporate governance.

**Corporate (non-financial)**

The manager reviews those ESG aspects that may be relevant in every issuer, especially reviews those incidents that we are considered severe. It will also follow the most important key indicators according to the sector in which the issuer operates.

**Assurance**

|           |           |        |               |         |
|-----------|-----------|--------|---------------|---------|
| CM 1 01.1 | Mandatory | Public | Core Assessed | General |
|-----------|-----------|--------|---------------|---------|

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

**CM 1 01.1**

Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:

- Third party assurance over selected responses from this year's PRI Transparency Report
- Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year
- Third party assurance or audit of the implementation of RI processes (that have been reported to the PRI this year)
- Internal audit conducted by internal auditors of the implementation of RI processes and/or RI data that have been reported to the PRI this year)
- Internal verification of responses before submission to the PRI (e.g. by the CEO or the board)
- Other, specify
- None of the above

**CM 1 01.2 & 01.8**

**Mandatory**

**Public**

**Descriptive**

**CM 1 01.2**

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

- Whole PRI Transparency Report will be assured
- Selected data will be assured
- We do not plan to assure this year's PRI Transparency report

**CM 1 01.3 & 01.9**

**Mandatory**

**Public**

**Descriptive**

**General**

**CM 1 01.3**

We undertook third party assurance on last year's PRI Transparency Report

- Whole PRI Transparency Report was assured last year
- Selected data was assured in last year's PRI Transparency Report
- We did not assure last year's PRI Transparency report, or we did not have such a report last year.

**CM 1 01.4, 10-12**

**Mandatory**

**Public**

**Descriptive**

**General**

**CM 1 01.4**

We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:

- We adhere to an RI certification or labelling scheme
- We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report
- ESG audit of holdings
- Other, specify
- None of the above