



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

# RI TRANSPARENCY REPORT

2020

## EdenTree Investment Management Ltd

## About this report

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

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

## PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

## Usage restrictions

Public Transparency Reports are the intellectual property of PRI. Under no circumstances, can this report or any of its contents be sold to third parties.

OO 01.1	Select the services and funds you offer	
	Select the services and funds you offer	% of asset under management (AUM) in ranges
	Fund management	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50%
	Fund of funds, manager of managers, sub-advised products	<input checked="" type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
	Other	<input checked="" type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
	Total 100%	

OO 02.1	Select the location of your organisation's headquarters.	
	United Kingdom	
OO 02.2	Indicate the number of countries in which you have offices (including your headquarters).	
	<input checked="" type="radio"/> 1 <input type="radio"/> 2-5 <input type="radio"/> 6-10 <input type="radio"/> >10	
OO 02.3	Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).	
	42.5	

OO 03.1	Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.	
	<input type="radio"/> Yes <input checked="" type="radio"/> No	

OO 04.1	Indicate the year end date for your reporting year.	
	31/12/2019	
OO 04.2	Indicate your total AUM at the end of your reporting year.	
	Total AUM 3,089,115,514 GBP 3990496466 USD	
OO 04.4	Indicate the assets which are subject to an execution and/or advisory approach. Provide this figure based on the end of your reporting year	
	<input checked="" type="checkbox"/> Not applicable as we do not have any assets under execution and/or advisory approach	

OO 05.1	Provide an approximate percentage breakdown of your AUM at the end of your reporting year using the following asset classes and investment strategies:	
	Internally managed (%)	Externally managed (%)
Listed equity	>50%	0

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

Internally managed 'Other (1)' description

Unquoted equity: direct stake in Mapfre

OO 06 Mandatory Descriptive General

OO 06.1 Select how you would like to disclose your asset class mix.

- as percentage breakdown
- as broad ranges

OO 06.3 Indicate whether your organisation has any off-balance sheet assets [Optional].

- Yes
- No

OO 06.5 Indicate whether your organisation uses fiduciary managers.

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

OO 07 Mandatory to Report, Voluntary to Disclose Gateway General

OO 07.1 Provide to the nearest 5% the percentage breakdown of your Fixed Income AUM at the end of your reporting year, using the following categories.

Internally managed	27.7	SSA
	41.1	Corporate (financial)
	31.2	Corporate (non-financial)
	0	Securitised

OO 09 Mandatory Peering General

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

97.8	Developed Markets
2.1	Emerging Markets
0	

0.1	Frontier Markets
	Other Markets

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

Listed equity – engagement	
<input checked="" type="checkbox"/>	We engage with companies on ESG factors via our staff, collaborations or service providers.
<input type="checkbox"/>	We do not engage directly and do not require external managers to engage with companies on ESG factors.
Listed equity – voting	
<input checked="" type="checkbox"/>	We cast our (proxy) votes directly or via dedicated voting providers
<input type="checkbox"/>	We do not cast our (proxy) votes directly and do not require external managers to vote on our behalf
Fixed income SSA – engagement	
<input checked="" type="checkbox"/>	We engage with SSA bond issuers on ESG factors via our staff, collaborations or service providers.
<input type="checkbox"/>	We do not engage directly and do not require external managers to engage with SSA bond issuers on ESG factors. Please explain why you do not.
Fixed income Corporate (financial) – engagement	
<input checked="" type="checkbox"/>	We engage with companies on ESG factors via our staff, collaborations or service providers.
<input type="checkbox"/>	We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.
Fixed income Corporate (non-financial) – engagement	
<input checked="" type="checkbox"/>	We engage with companies on ESG factors via our staff, collaborations or service providers.
<input type="checkbox"/>	We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.

OO 11	Mandatory	Gateway	General
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OO 11.1 Select the internally managed asset classes in which you addressed ESG incorporation into your investment decisions and/or your active ownership practices (during the reporting year).

Listed equity	
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
Fixed income - SSA	
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
Fixed income - corporate (financial)	
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
Fixed income - corporate (non-financial)	
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
Property	
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
Cash	
<input type="checkbox"/>	We address ESG incorporation.
<input checked="" type="checkbox"/>	We do not do ESG incorporation.
Other (1)	
<input type="checkbox"/>	We address ESG incorporation.
<input checked="" type="checkbox"/>	We do not do ESG incorporation.
Other (1) [as defined in OO 05]	

Unquoted equity; direct stake in Mapfre

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

Core modules	
<input checked="" type="checkbox"/>	Organisational Overview
<input checked="" type="checkbox"/>	Strategy and Governance
RI implementation directly or via service providers	
Direct - Listed Equity incorporation	
<input checked="" type="checkbox"/>	Listed Equity incorporation
Direct - Listed Equity active ownership	
<input checked="" type="checkbox"/>	Engagements
<input checked="" type="checkbox"/>	(Proxy) voting
Direct - Fixed Income	
<input checked="" type="checkbox"/>	Fixed income - SSA
<input checked="" type="checkbox"/>	Fixed income - Corporate (financial)
<input checked="" type="checkbox"/>	Fixed income - Corporate (non-financial)
Direct - Other asset classes with dedicated modules	
<input checked="" type="checkbox"/>	Property
Closing module	
<input checked="" type="checkbox"/>	Closing module

**OO LE 01.1** Provide a breakdown of your internally managed listed equities by passive, active - quantitative (quant), active - fundamental and active - other strategies.

0	Passive
0	Active - quantitative (quant)
100	Active - fundamental and active - other

**OO LE 01.2** Additional information. [Optional]

We actively manage all of our funds. This includes active stock picking without mirroring market indices. We vote on all our holdings in all markets (except where share-blocked) and actively engage with companies in all funds.

**OO FI 01.1** Provide a breakdown of your internally managed fixed income securities by active and passive strategies

<b>SSA</b>	Passive
	0
	Active - quantitative (quant)
<b>Corporate (financial)</b>	Active - fundamental and active - other
	0
	Passive
<b>Corporate (financial)</b>	Active - quantitative (quant)
	0
	Active - fundamental and active - other
100	

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

**OO FI 03** Mandatory Descriptive General

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

SSA	<input type="checkbox"/>	Developed markets	100
	<input type="checkbox"/>	Emerging markets	0

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

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

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

**OO PR 01.1** Indicate the level of ownership you typically hold in your property investments.

- a majority stake (50% and above)
- a significant minority stake (10 and above, and under 50%)
- a limited minority stake (<10%)
- a mix of ownership stakes
- N/A, we manage properties, new constructions and/or refurbishments on behalf of our clients, but do not hold equity in property on their behalf

**OO PR 01.2** Provide a breakdown of your organisations allocation to Real Estate Investment Trusts (REITs) or similar

- >50%
- 10 – 50%
- <10%
- 0%

**OO PR 02** Mandatory to Report, Voluntary to Disclose Gateway General

**OO PR 02.1** Provide a breakdown of your organisation's property assets based on who manages the assets.

Property assets managed by	Breakdown of your property assets (by number)
Managed directly by your organisation	<input type="checkbox"/> >50% <input type="checkbox"/> 10-50% <input type="checkbox"/> <10% <input checked="" type="checkbox"/> 0%
Managed via third-party property managers appointed by you	<input checked="" type="checkbox"/> >50% <input type="checkbox"/> 10-50% <input type="checkbox"/> <10% <input type="checkbox"/> 0%
Managed by other investors or their property managers	<input type="checkbox"/> >50% <input type="checkbox"/> 10-50% <input type="checkbox"/> <10% <input checked="" type="checkbox"/> 0%

Managed by tenant(s) with operational control	<input type="radio"/> > 50% <input type="radio"/> 10-50% <input type="radio"/> < 10% <input checked="" type="radio"/> 0%
Total 100%	

OO PR 03	Mandatory to Report, Voluntary to Disclose	Descriptive	General
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OO PR 03.1 Indicate up to three of your largest property types by AUM.

Types	Main property types (by AUM)
Largest property type	<input type="radio"/> Industrial <input checked="" type="radio"/> Retail <input type="radio"/> Office <input type="radio"/> Residential <input type="radio"/> Leisure/Hotel <input type="radio"/> Mixed use <input type="radio"/> Other, specify
Second largest property type	<input checked="" type="radio"/> Industrial <input type="radio"/> Retail <input type="radio"/> Office <input type="radio"/> Residential <input type="radio"/> Leisure/Hotel <input type="radio"/> Mixed use <input type="radio"/> Other, specify
Third largest property type	<input type="radio"/> Industrial <input type="radio"/> Retail <input checked="" type="radio"/> Office <input type="radio"/> Residential <input type="radio"/> Leisure/Hotel <input type="radio"/> Mixed use <input type="radio"/> Other, specify

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



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.

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

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
- Understanding and incorporating client / beneficiary sustainability preferences
- Other RI considerations, specify (1)
- Other RI considerations, specify (2)

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

Our investment philosophy is based on the principles set out below:

- Active management: Be flexible to best position the portfolio to take advantage of opportunities
- Value stock picking: Buy companies when their price is attractive
- Contrarian asset selection: Prefer stocks that have fallen out of favour
- Long term investment horizons: Allow time for companies' intrinsic value to be recognised and reduce trading fees
- Broad diversification: Reducing risk and volatility
- Responsible & Sustainable approach: Responsible and sustainable companies are more likely to outperform over the long-term

SG 01.5 Provide a brief description of the key elements, any variations or exceptions to your investment policy that covers your responsible investment approach. [Optional]

EdenTree's RI approach is based on four pillars: screening, engagement, governance and research. EdenTree manages a variety of funds and mandates for retail, charity and institutional clients. EdenTree applies the same importance to stewardship across all assets under management: our voting, engagement and stewardship policies therefore apply to all funds. We also apply different forms of negative and positive screening across the majority of our funds, however they are tailored depending on the client's mandate.

For our Amity Funds, our policies are the same for fixed income and equity; we therefore do not have asset class specific RI guidelines. We have also developed a policy for our direct property investments. Group investments also apply the same negative screening criteria for equities and fixed income.

No

SG 01.6 CC Indicate whether your organisation has identified transition and physical climate-related risks and opportunities and factored this into the investment strategies and products, within the organisation's investment time horizon.

Yes

Describe the identified transition and physical climate-related risks and opportunities and how they have been factored into the investment strategies/products.

We assess climate-related risks through our company screening process under our environmental management pillar.

We also aim to understand and reduce the risks of climate breakdown in our portfolios. Carbon footprinting our equity portfolios is the first step in this approach. As climate risks become more acute, we are seeking a more integrated, systemic method of assessing physical and transition risks across our portfolios, and this be a key piece of work through 2020. We started carbon footprinting our equity portfolios in 2016, and reported on the fourth consecutive year of undertaking these in 2019.

As part of our analysis we have identified risks related to regulatory changes and environmental-related costs as well as transition risks and physical risks for the companies we invest in. We also consider that some companies will benefit from opportunities created by a low carbon economy and also see increased concern from clients on exposure to high-emitting companies in the portfolios.

No

**SG 01.7 CC** Indicate whether the organisation has assessed the likelihood and impact of these climate risks?

Yes

No

Describe why your organisation has not yet assessed the likelihood and impact of climate risks

We have not conducted any climate scenario analysis or stress tests for our portfolios to assess the likelihood and impact of climate change risks. Companies in our portfolios rarely report the likelihood and impacts of climate risks themselves; as a result, we believe the models available are very complex and costly and rely on estimates and inaccurate data.

We have however looked at the PRI's inevitable policy response work and also held several lectures in partnership with the Grantham Institute to support the investment's team awareness of climate risks.

**SG 01.8 CC** Indicate whether the organisation publicly supports the TCFD?

Yes

No

**SG 01.9 CC** Indicate whether there is an organisation-wide strategy in place to identify and manage material climate-related risks and opportunities.

Yes

No

Describe how and over what time frame the organisation will implement an organisation-wide strategy that manages climate-related risks and opportunities.

Currently we already monitor and manage climate-related risks and opportunities for our Amity range of funds as well as other segregated mandates that apply a responsible and sustainable investment approach. We manage different mandates for clients and the timeframe will vary accordingly to the client's needs.

**SG 1.10 CC** Indicate the documents and/or communications the organisation uses to publish TCFD disclosures.

- Public PRI Climate Transparency Report
- Annual financial filings
- Regular client reporting
- Member communications
- Other
- We currently do not publish TCFD disclosures

**SG 02** **Mandatory** **Core Assessed** **PRI 6**

**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  
<https://www.edentreeim.com/approach>
- Attachment (will be made public)

Formalised guidelines on environmental factors

URL/Attachment

- URL  
<https://www.edentreeim.com/approach>
- Attachment (will be made public)

Formalised guidelines on social factors

URL/Attachment

- URL  
<https://www.edentreeim.com/approach>
- Attachment (will be made public)

Formalised guidelines on corporate governance factors

URL/Attachment	
<input checked="" type="checkbox"/> URL	<a href="https://www.edentreeim.com/approach">https://www.edentreeim.com/approach</a>
<input type="checkbox"/> Attachment (will be made public)	

Sector specific RI guidelines

URL/Attachment	
<input checked="" type="checkbox"/> URL	<a href="https://www.edentreeim.com/approach">https://www.edentreeim.com/approach</a>
<input type="checkbox"/> Attachment (will be made public)	

Screening / exclusions policy

URL/Attachment	
<input checked="" type="checkbox"/> URL	<a href="https://www.edentreeim.com/approach">https://www.edentreeim.com/approach</a>
<input type="checkbox"/> Attachment (will be made public)	

Engagement policy

URL/Attachment	
<input checked="" type="checkbox"/> URL	<a href="https://www.edentreeim.com/docs/default-source/governance/ri-credentials/uk-stewardship-code-statement-2020.pdf?sfvrsn=eea651b_3">https://www.edentreeim.com/docs/default-source/governance/ri-credentials/uk-stewardship-code-statement-2020.pdf?sfvrsn=eea651b_3</a>
<input type="checkbox"/> Attachment (will be made public)	

(Proxy) voting policy

URL/Attachment	
<input checked="" type="checkbox"/> URL	<a href="https://www.edentreeim.com/docs/default-source/governance/ri-credentials/corporate-governance-policy-2020.pdf?sfvrsn=2c6665f0_0">https://www.edentreeim.com/docs/default-source/governance/ri-credentials/corporate-governance-policy-2020.pdf?sfvrsn=2c6665f0_0</a>
<input type="checkbox"/> Attachment (will be made public)	

Other, specify (1)

We do not publicly disclose our investment policy documents

**SG 02.2** Indicate if any of your investment policy components are publicly available. Provide URL and an attachment of the document.

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

URL/Attachment	
<input checked="" type="checkbox"/> URL	<a href="https://www.edentreeim.com/approach">https://www.edentreeim.com/approach</a>
<input type="checkbox"/> Attachment	

Time horizon of your investment

URL/Attachment	
<input checked="" type="checkbox"/> URL	<a href="https://www.edentreeim.com/approach">https://www.edentreeim.com/approach</a>
<input type="checkbox"/> Attachment	

Governance structure of organisational ESG responsibilities

URL/Attachment	
<input checked="" type="checkbox"/> URL	<a href="https://www.edentreeim.com/docs/default-source/governance/ri-credentials/uk-stewardship-code-statement-2020.pdf?sfvrsn=eea651b_3">https://www.edentreeim.com/docs/default-source/governance/ri-credentials/uk-stewardship-code-statement-2020.pdf?sfvrsn=eea651b_3</a>
<input type="checkbox"/> Attachment	

ESG incorporation approaches

URL/Attachment	
<input checked="" type="checkbox"/> URL	<a href="https://www.edentreeim.com/approach">https://www.edentreeim.com/approach</a>
<input type="checkbox"/> Attachment	

Active ownership approaches

<input checked="" type="checkbox"/>	URL/Attachment
<input checked="" type="checkbox"/>	URL <a href="https://www.edentreeim.com/docs/default-source/governance/ri-credentials/uk-stewardship-code-statement-2020.pdf?sfvrsn=eea651b_3">https://www.edentreeim.com/docs/default-source/governance/ri-credentials/uk-stewardship-code-statement-2020.pdf?sfvrsn=eea651b_3</a>
<input type="checkbox"/>	Attachment
<input checked="" type="checkbox"/>	Reporting
<input checked="" type="checkbox"/>	URL/Attachment
<input checked="" type="checkbox"/>	URL <a href="https://www.edentreeim.com/docs/default-source/governance/ri-credentials/uk-stewardship-code-statement-2020.pdf?sfvrsn=eea651b_3">https://www.edentreeim.com/docs/default-source/governance/ri-credentials/uk-stewardship-code-statement-2020.pdf?sfvrsn=eea651b_3</a>
<input type="checkbox"/>	Attachment
<input checked="" type="checkbox"/>	Climate change
<input checked="" type="checkbox"/>	URL/Attachment
<input checked="" type="checkbox"/>	URL <a href="https://www.edentreeim.com/approach">https://www.edentreeim.com/approach</a>
<input type="checkbox"/>	Attachment
<input type="checkbox"/>	We do not publicly disclose any investment policy components

**SG 02.3** Additional information [Optional].

We publish a variety of policies related to our responsible and sustainable investment approach, describing our overall approach and our specific screening criteria as well as engagement and voting activities.

In addition to the policies listed above, we also publish an overseas corporate governance policy:  
[https://www.edentreeim.com/docs/default-source/governance/ri-credentials/corporate-governance-policy-ex-uk-2020.pdf?sfvrsn=2f5f0dc3\\_0](https://www.edentreeim.com/docs/default-source/governance/ri-credentials/corporate-governance-policy-ex-uk-2020.pdf?sfvrsn=2f5f0dc3_0)

We are also signatories to the European SRI transparency Code.  
[https://www.edentreeim.com/docs/default-source/governance/ri-credentials/edentree-investment-management-ltd---eurosif-response-2019---equity-funds.pdf?sfvrsn=98be208c\\_0](https://www.edentreeim.com/docs/default-source/governance/ri-credentials/edentree-investment-management-ltd---eurosif-response-2019---equity-funds.pdf?sfvrsn=98be208c_0)  
[https://www.edentreeim.com/docs/default-source/governance/ri-credentials/edentree-investment-management-ltd---eurosif-response-2019---fixed-income.pdf?sfvrsn=78d6ba92\\_0](https://www.edentreeim.com/docs/default-source/governance/ri-credentials/edentree-investment-management-ltd---eurosif-response-2019---fixed-income.pdf?sfvrsn=78d6ba92_0)

<b>SG 03</b>	<b>Mandatory</b>	<b>Core Assessed</b>	<b>General</b>
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**SG 03.1** Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.

Yes

**SG 03.2** Describe your policy on managing potential conflicts of interest in the investment process.

We are a regulated business and have comprehensive procedural documents to comply with regulation around conflicts of interest.

We do not advise or publish advice that might conflict with the responsibilities of managing investments on behalf of EIM.

EdenTree has identified its potential material conflicts as:

- Conflicts relating to the interests of the Ecclesiastical Insurance Office (EIO) Group (EIG) and the investors in the funds managed by EdenTree;
- Failing to allocate securities between fund clients on an equitable basis;
- Inappropriate use of the services of the EIO Group;
- Substantial gifts or entertainment;
- Entering into mandates where clients have conflicting interests;
- Entering into mandates where client interests may conflict with those of EIO Group;
- Misuse of information for personal gain/insider dealing;
- Inappropriate use of dealing commissions;
- Personal Account Dealing by employees, and Remuneration and oversight

EdenTree procedures and processes are fully documented and in place to support and comply with the conflicts of interest policy.

Full details are disclosed in our Stewardship Code Statement:  
[https://www.edentreeim.com/docs/default-source/governance/ri-credentials/uk-stewardship-code-statement-2020.pdf?sfvrsn=eea651b\\_3](https://www.edentreeim.com/docs/default-source/governance/ri-credentials/uk-stewardship-code-statement-2020.pdf?sfvrsn=eea651b_3)

No

**SG 03.3** Additional information. [Optional]

Our TCF Policy is set out here:

**Introduction**

*EdenTree Investment Management (EdenTree) is one of the leading responsible and sustainable investment managers in the UK and has been running ethical funds since 1988. The high standards we expect from the companies we invest in, is reflected in our own business and the manner in which we aim to do business with all of our stakeholders from suppliers to consumers.*

*At EdenTree, we are fully committed to supporting the Financial Conduct Authority's (FCA) retail regulatory agenda, which aims to ensure an efficient and*

effective market and thereby help consumers achieve a fair deal. Central to the delivery of this is Treating Customers Fairly (TCF) whether you are retail or non-retail client.

The FCA expects six consumer focused outcomes based around the product life cycle. They are that:

You can be confident that you are dealing with firms where your fair treatment is central to the corporate culture.

Products and services marketed and sold in the retail market are designed to meet the needs of identified consumer groups and are targeted accordingly.

You are provided with clear information and are kept appropriately informed before, during and after the point of sale.

Where you receive advice, the advice will be suitable and takes account of your circumstances.

You are provided with products that perform as we have led you to expect, and our associated service is both of an acceptable standard and as you have been led to expect.

You do not face unreasonable post-sale barriers imposed by us to change product, switch provider, submit a claim or make a complaint.

TCF is an integral part of the way we do business and it is particularly relevant in three key areas; product design and product selection; the sales process; and client service and aftersales administration. These three areas encompass outcomes 2 to 6 of the six FCA customer outcomes with Culture (1) being the critical overarching outcome spanning all areas.

#### What do these outcomes mean to EdenTree Investment Management?

Outcome 1 : TCF culture is central to a firm

Treating customers fairly is not an after thought, it is fully embedded in our culture and plays an integral role in all decisions and activities that may impact our customers. All business areas have TCF at the heart of their operations. EdenTree carries out regular training and monitoring of its TCF policy and this extends to the policies and procedures of its outsourced providers.

Outcome 2 : Products and services meet the needs of the customer

We will clearly identify the target markets for all our products and make it clear for whom our products are suitable. We will make sure our products are well designed, simple and easily understood by our retail customers and that marketing materials are clear and transparent. We will regularly review the continued appropriateness of our products to ensure that they remain fit for purpose and deliver the needs of our target markets. By way of example, our ethical range of funds is aimed specifically at charities and investors seeking socially responsible investments (SRIs). For these SRI funds we carry out both negative and positive screening with a strong emphasis on corporate governance.

Outcome 3 : Clear information is given to customers

We will provide customers with appropriate information and communication for the duration of their relationship with us, i.e. before, during and after the point of sale. When preparing information, we aim to provide it in a format that is fair, simple to understand and fully transparent.

Outcome 4 : Suitable advice is given to customers

We do not provide investment advice to retail customers. However we ensure that the information we provide to customers, whether direct or via an intermediary, is accurate, simple to understand and fully transparent enabling investors to make an informed decision based upon their personal circumstances.

Outcome 5 : Products perform in line with customer's expectations

We will regularly review the continued appropriateness and performance of our products to ensure they are managed and administered in line with stated objectives and continue to meet the needs of customers. We will take appropriate action if any concerns are identified.

Outcome 6 : No unreasonable post sale barriers imposed

Once an investor has invested with EdenTree we aim to ensure that they continue to have access to information they require and that service levels continue to meet their expectations. Where customers do decide that they wish to switch or exit a fund, we aim to make this as seamless as possible. We do not impose any unreasonable post sale barriers should clients wish to switch between products and /or providers.

We recognise that mistakes or errors can occur. Whilst this is rare, when mistakes are made we will deal with any complaints promptly and fairly, making every effort to resolve them first time, achieving the right outcome for our customers. We will learn from complaints by completing a root cause analysis and implementing improvements.

EdenTree Investment Management is a wholly owned subsidiary of Ecclesiastical Insurance Office plc (EIO). EIO as a whole takes its responsibilities as a product provider very seriously and is fully committed to the fair treatment of customers across the group. All business areas are required to monitor their TCF performance and provide regular reporting to the Board and Group Risk and Compliance.

SG 04	Voluntary	Descriptive	General
SG 04.1	Indicate if your organisation has a process for identifying and managing incidents that occur within investee entities.		
	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
SG 04.2	Describe your process on managing incidents		
	We actively follow corporate news of the companies we invest in. During 2019, we received bi-weekly controversy alerts for our portfolios from our ESG data provider Sustainalytics. Controversies are discussed within the RI team and shared with fund managers. Based on severity, the team may decide to engage with the investee company to gain clarity on the incident and pursue investigation further.		

SG 05	Mandatory	Gateway/Core Assessed	General
SG 05.1	Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.		
	<input type="checkbox"/> Quarterly or more frequently <input type="checkbox"/> Biannually <input checked="" type="checkbox"/> Annually <input type="checkbox"/> Less frequently than annually <input type="checkbox"/> Ad-hoc basis <input type="checkbox"/> It is not set/reviewed		
SG 05.2	Additional information. [Optional]		
	Our Amity approach to responsible and sustainable investment commences at stock idea stage, with ESG fully integrated into stock selection and retention. To that end, our objective in managing responsible investment is to select stocks that meet the criteria of the Funds.  Our annual objectives are:		

- to be the best ethical investment provider
- to reinforce and promote our leadership position in Responsible & Sustainable investing
- to remain a thought-leader in Responsible & Sustainable Investment
- to be nominated for independent awards
- to increase screened AUM

SG 06	Voluntary	Descriptive	General
SG 06.1	List the main responsible investment objectives that your organisation set for the reporting year.		
Responsible investment processes			
<input checked="" type="checkbox"/> Provide training on ESG incorporation			
		Key performance indicator	
One of our goals is to be a thought-leader in responsible and sustainable investment.			
		Progress achieved	
During the year we published three Amity insights: The Life Code, Sustainability and Economic Inequality.			
<input checked="" type="checkbox"/> Provide training on ESG engagement			
		Key performance indicator	
One of our goals is to be a thought-leader in responsible and sustainable investment			
		Progress achieved	
During the year we hosted various events for clients where we spoke about responsible and sustainable investment issues.			
<input checked="" type="checkbox"/> Improved communication of ESG activities within the organisation			
		Key performance indicator	
One of our goals is to reinforce and promote our leadership position in responsible and sustainable investing.			
		Progress achieved	
During 2019 we maintained communications internally through bi-weekly updates on RI activities to the fund management and distribution teams. We also presented to all EdenTree staff on our responsible and sustainable investment process and how this works.			
<input type="checkbox"/> Improved engagement to encourage change with regards to management of ESG issues			
<input checked="" type="checkbox"/> Improved ESG incorporation into investment decision making processes			
		Key performance indicator	
One of our goals is to be a thought-leader in responsible and sustainable investment. In 2019, we redefined our negative screen on oppressive regimes.			
		Progress achieved	
Our newly articulated Oppressive Regimes negative screen has been put into practice, we will maintain a list of countries in which human rights risks are considered more ubiquitous, severe, or opaque. Our Oppressive Regimes list is based on the assessments of Freedom House ("Freedom in the World"), Transparency International ("Corruption Perceptions Index"), and the World Economic Forum ("Gender Gap assessment"). We will also maintain and review the list of corporate activities which, where they overlap with government policies and practices of oppressive regimes, can trigger the negative screen.			
<input type="checkbox"/> Other, specify (1)			
<input type="checkbox"/> Other, specify (2)			
<input type="checkbox"/> Other, specify (3)			
<input type="checkbox"/> None of the above			
Financial performance of investments			
<input type="checkbox"/> Increase portfolio performance by consideration of ESG factors			
<input checked="" type="checkbox"/> Other, specify (1)			
		other description (1)	
One of our objectives is to increase screened AUM			
		Key performance indicator	
AUM of investments that are both negatively and positively screened			
		Progress achieved	
Negatively and positively screened AUM increased from £735 million in December 2018 to £1,043 million in December 2019.			
<input type="checkbox"/> Other, specify (2)			
<input type="checkbox"/> Other, specify (3)			
<input type="checkbox"/> None of the above			

Other activities			
<input checked="" type="checkbox"/>	Joining and/or participation in RI initiatives		
	<table border="1"> <thead> <tr> <th>Key performance indicator</th> </tr> </thead> <tbody> <tr> <td>One of our goals is to be a thought-leader in responsible and sustainable investment.</td> </tr> </tbody> </table>	Key performance indicator	One of our goals is to be a thought-leader in responsible and sustainable investment.
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	<table border="1"> <thead> <tr> <th>Progress achieved</th> </tr> </thead> <tbody> <tr> <td>During the year we participated in a variety of RI initiatives, where we contributed to positive change. Some examples include our engagement on gender diversity as a member of the 30% club and our collaboration on animal welfare as a supporter of BBFAW.</td> </tr> </tbody> </table>	Progress achieved	During the year we participated in a variety of RI initiatives, where we contributed to positive change. Some examples include our engagement on gender diversity as a member of the 30% club and our collaboration on animal welfare as a supporter of BBFAW.
Progress achieved			
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<input type="checkbox"/>	Encouraging others to join a RI initiative		
<input type="checkbox"/>	Documentation of best practice case studies		
<input checked="" type="checkbox"/>	Using case studies to demonstrate engagement and ESG incorporation to clients		
	<table border="1"> <thead> <tr> <th>Key performance indicator</th> </tr> </thead> <tbody> <tr> <td>One of our goals is to be a thought leader in responsible and sustainable investment.</td> </tr> </tbody> </table>	Key performance indicator	One of our goals is to be a thought leader in responsible and sustainable investment.
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<input checked="" type="checkbox"/>	Other, specify (1)		
	<table border="1"> <thead> <tr> <th>other description (1)</th> </tr> </thead> <tbody> <tr> <td>Client recognition</td> </tr> </tbody> </table>	other description (1)	Client recognition
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Progress achieved			
During the year we won the Moneyfacts Best Ethical Investment Provider for the eleventh successive year.			
<input type="checkbox"/>	Other, specify (2)		
<input type="checkbox"/>	Other, specify (3)		
<input type="checkbox"/>	None of the above		

SG 07	Mandatory	Core Assessed	General
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SG 07.1 Indicate the internal and/or external roles used by your organisation, and indicate for each whether they have oversight and/or implementation responsibilities for responsible investment.

Roles							
<input checked="" type="checkbox"/>	Board members or trustees						
	<input checked="" type="checkbox"/> Oversight/accountability for responsible investment <input type="checkbox"/> Implementation of responsible investment <input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment						
<input checked="" type="checkbox"/>	Internal Roles (triggers other options)						
	<table border="1"> <thead> <tr> <th>Select from the below internal roles</th> </tr> </thead> <tbody> <tr> <td> <input checked="" type="checkbox"/> Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee               <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Oversight/accountability for responsible investment</li> <li><input checked="" type="checkbox"/> Implementation of responsible investment</li> <li><input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment</li> </ul> </td> </tr> <tr> <td> <input checked="" type="checkbox"/> Other Chief-level staff or head of department, specify               <ul style="list-style-type: none"> <li>Head of RI Policy &amp; Research                   <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Oversight/accountability for responsible investment</li> <li><input checked="" type="checkbox"/> Implementation of responsible investment</li> <li><input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment</li> </ul> </li> </ul> </td> </tr> <tr> <td> <input checked="" type="checkbox"/> Portfolio managers               <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Oversight/accountability for responsible investment</li> <li><input checked="" type="checkbox"/> Implementation of responsible investment</li> <li><input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment</li> </ul> </td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Investment analysts</td> </tr> </tbody> </table>	Select from the below internal roles	<input checked="" type="checkbox"/> Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Oversight/accountability for responsible investment</li> <li><input checked="" type="checkbox"/> Implementation of responsible investment</li> <li><input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment</li> </ul>	<input checked="" type="checkbox"/> Other Chief-level staff or head of department, specify <ul style="list-style-type: none"> <li>Head of RI Policy &amp; Research                   <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Oversight/accountability for responsible investment</li> <li><input checked="" type="checkbox"/> Implementation of responsible investment</li> <li><input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment</li> </ul> </li> </ul>	<input checked="" type="checkbox"/> Portfolio managers <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Oversight/accountability for responsible investment</li> <li><input checked="" type="checkbox"/> Implementation of responsible investment</li> <li><input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment</li> </ul>	<input checked="" type="checkbox"/>	Investment analysts
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<input checked="" type="checkbox"/>	Investment analysts						

- Oversight/accountability for responsible investment
- Implementation of responsible investment
- No oversight/accountability or implementation responsibility for responsible investment
- Dedicated responsible investment staff
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Investor relations
- Other role, specify (1)

**Other description (1)**

The independent Amity Panel

- Oversight/accountability for responsible investment
- Implementation of responsible investment
- No oversight/accountability or implementation responsibility for responsible investment
- Other role, specify (2)

External managers or service providers

- Oversight/accountability for responsible investment
- Implementation of responsible investment
- No oversight/accountability or implementation responsibility for responsible investment

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

RI is managed as an integrated process, in which all members of the investment team are expected fully to integrate material ESG risks into stock selection.

The Responsible Investment Team provides final sign off regarding stock ideas and makes recommendations for engagement. The Head of RI Policy & Research is responsible for final sign-off under the terms of the Policy. A breach of the Ethics/Values screen is a default exclusion. We assess the positive utility of any stock idea according to our ESG/responsibility and thematic/sustainability screens and assess whether the stock is therefore a comfortable fit for the RI Funds.

Engagement is deployed before, during or after investment depending on the nature of the risk. Once invested we seek to vote on every holding in all jurisdictions and stocks are monitored for continuing compliance with our RI approach on an annual basis. Responsibility for UK voting execution lies with the RI team, whilst our external proxy advisor, Glass Lewis & Co, has responsibility for the implementation of our overseas voting policy.

The Head of RI Policy & Research reports to the Chief Executive Officer, who in turn leads the EIM Executive Management Team. The EIM Board has ultimate oversight of the entire investment process including the integrity of the responsible investment policy and process.

The EIM Board, which includes Executive and Non-Executive membership, is chaired by the Group CEO, and reports to the Ecclesiastical Insurance Group Board. Regular reports on responsible investment are provided to both the EIM and Group Boards.

The Amity Panel meets three times a year in order to advise the RI Team and provide feedback on the team's work and initiatives. The Panel comprises independent members with relevant expertise. The Chair of the Amity Panel reports annually to the EIM Board on the panel's work. <https://www.edentreeim.com/about-us> for biographies of the Amity Panel members.

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

3

**SG 07.4 Additional information. [Optional]**

EdenTree's RI Team comprises three people. Together they are responsible for screening, engagement, voting and research. A strategy that defines Environmental, Social and Governance (ESG) leads has also been determined within the team.

SG 07 CC	Mandatory to Report, Voluntary to Disclose	Descriptive	General
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**SG 07.5 CC Indicate the roles in the organisation that have oversight, accountability and/or management responsibilities for climate-related issues.**

**Board members or trustees**

- Oversight/accountability for climate-related issues
- Assessment and management of climate-related issues
- No responsibility for climate-related issues

**Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Risk Officer (CRO), Investment Committee**

- Oversight/accountability for climate-related issues
- Assessment and management of climate-related issues
- No responsibility for climate-related issues

**Other Chief-level staff or heads of departments**

- Oversight/accountability for climate-related issues



- Assessment and management of climate-related issues
- No responsibility for climate-related issues

**Portfolio managers**

- Oversight/accountability for climate-related issues
- Assessment and management of climate-related issues
- No responsibility for climate-related issues

**Investment analysts**

- Oversight/accountability for climate-related issues
- Assessment and management of climate-related issues
- No responsibility for climate-related issues

**Dedicated responsible investment staff**

- Oversight/accountability for climate-related issues
- Assessment and management of climate-related issues
- No responsibility for climate-related issues

**External managers or service providers**

- Oversight/accountability for climate-related issues
- Assessment and management of climate-related issues
- No responsibility for climate-related issues

**Other role, specify (1)**

- The independent Amity Panel
- Oversight/accountability for climate-related issues
  - Assessment and management of climate-related issues
  - No responsibility for climate-related issues

**SG 07.6 CC** For board-level roles that have climate-related issue oversight/accountability or implementation responsibilities, indicate how these responsibilities are executed.

Board level responsibility for climate change is part of their wider oversight duties on EdenTree's responsible and sustainable investment approach.

SG 08	Voluntary	Additional Assessed	General
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**SG 08.1** Indicate if your organisation's performance management, reward and/or personal development processes have a responsible investment element.

**Board members/Board of trustees**

**SG 08.1b** RI in personal development and/or training plan

- Responsible investment included in personal development and/or training plan

**SG 08.2** Describe any activities undertaken during the reporting year to develop and maintain Board members' skills and knowledge in relation to responsible investment.

The EIM Board receives regular reports of RI activity. Policies are approved by the Board including the UK Corporate Governance Policy and the UK Stewardship Code Statement. The Board is encouraged to provide comment and feedback on the RI process and outcomes.

The Amity Panel has advisory oversight of the RI process, activity, fund transactions and controversies. New Non-Executive Board members have also attended Amity Panel meetings to develop knowledge and understanding of responsible and sustainable investment.

- None of the above

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

**SG 08.1a** RI in objectives, appraisal and/or reward

- Responsible investment KPIs and/or goals included in objectives
- Responsible investment included in appraisal process
- Variable pay linked to responsible investment performance
- None of the above

**SG 08.1b** RI in personal development and/or training plan

- Responsible investment included in personal development and/or training plan
- None of the above

**Other C-level staff or head of department**

SG 08.1a	RI in objectives, appraisal and/or reward
<input checked="" type="checkbox"/> Responsible investment KPIs and/or goals included in objectives <input checked="" type="checkbox"/> Responsible investment included in appraisal process <input checked="" type="checkbox"/> Variable pay linked to responsible investment performance <input type="checkbox"/> None of the above	

SG 08.1b	RI in personal development and/or training plan
<input checked="" type="checkbox"/> Responsible investment included in personal development and/or training plan <input type="checkbox"/> None of the above	

**Portfolio managers**

SG 08.1a	RI in objectives, appraisal and/or reward
<input checked="" type="checkbox"/> Responsible investment KPIs and/or goals included in objectives <input checked="" type="checkbox"/> Responsible investment included in appraisal process <input checked="" type="checkbox"/> Variable pay linked to responsible investment performance <input type="checkbox"/> None of the above	

SG 08.1b	RI in personal development and/or training plan
<input checked="" type="checkbox"/> Responsible investment included in personal development and/or training plan <input type="checkbox"/> None of the above	

**Investment analysts**

SG 08.1a	RI in objectives, appraisal and/or reward
<input checked="" type="checkbox"/> Responsible investment KPIs and/or goals included in objectives <input checked="" type="checkbox"/> Responsible investment included in appraisal process <input checked="" type="checkbox"/> Variable pay linked to responsible investment performance <input type="checkbox"/> None of the above	

SG 08.1b	RI in personal development and/or training plan
<input checked="" type="checkbox"/> Responsible investment included in personal development and/or training plan <input type="checkbox"/> None of the above	

**Dedicated responsible investment staff**

SG 08.1a	RI in objectives, appraisal and/or reward
<input checked="" type="checkbox"/> Responsible investment KPIs and/or goals included in objectives <input checked="" type="checkbox"/> Responsible investment included in appraisal process <input checked="" type="checkbox"/> Variable pay linked to responsible investment performance <input type="checkbox"/> None of the above	

SG 08.1b	RI in personal development and/or training plan
<input checked="" type="checkbox"/> Responsible investment included in personal development and/or training plan <input type="checkbox"/> None of the above	

**Other role (1) [from SG 07]**

The independent Amity Panel

SG 08.1a	RI in objectives, appraisal and/or reward
<input checked="" type="checkbox"/> Responsible investment KPIs and/or goals included in objectives <input checked="" type="checkbox"/> Responsible investment included in appraisal process <input type="checkbox"/> Variable pay linked to responsible investment performance <input type="checkbox"/> None of the above	

SG 08.1b	RI in personal development and/or training plan
<input checked="" type="checkbox"/> Responsible investment included in personal development and/or training plan <input type="checkbox"/> None of the above	

**SG 08.3** Provide any additional information on your organisation's performance management, reward and/or personal development processes in relation to responsible investment.

We run an integrated process where all members of the investment team are responsible for assessing and analysing the ESG credentials of any investment idea/holding.  
Responsible investment KPIs are included in objectives and in appraisal process. Variable pay is also linked to responsible investment performance.

SG 09.1 Select the collaborative organisation and/or initiatives of which your organisation is a member or in which it participated during the reporting year, and the role you played.

Principles for Responsible Investment

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

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]  
We participate in several collaborative work streams as a supporting investor. During 2019, EdenTree acted as a lead-investor for the PRI collaborative engagement on cobalt.  
We have also joined collaborative initiatives involving investor statements or letters, we participated in several PRI webinars and training sessions and attended PRI in Person.

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

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

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]  
We are investor signatories and integrate CDP data as part of our stock analysis. It forms the basis for our internal and external portfolio carbon footprint initiative. We used CDP data as a starting point for engagement on company CO2 emissions. We also participated as a lead investor in the CDP's non-disclosure campaign.  
During 2019 CDP was our provider for portfolio carbon footprint analysis.

CDP Forests

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

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]  
We are investor signatories and integrate CDP Forest data as part of our stock analysis where relevant.

CDP Water

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

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]  
We are investor signatories and integrate CDP Water data as part of our stock analysis where relevant.

- CFA Institute Centre for Financial Market Integrity
- Climate Action 100+
- Code for Responsible Investment in SA (CRISA)
- Council of Institutional Investors (CII)
- Eumedion
- Extractive Industries Transparency Initiative (EITI)
- ESG Research Australia
- Invest Europe Responsible Investment Roundtable
- Global Investors Governance Network (GIGN)
- Global Impact Investing Network (GIIN)
- Global Real Estate Sustainability Benchmark (GRESB)
- Green Bond Principles
- HKVCA: ESG Committee
- Institutional Investors Group on Climate Change (IIGCC)

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

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

We joined IIGCC in late 2015 in order to respond to the issue of climate change by working with international investor coalitions. We attended the annual members meeting, and investor workshops to help us with our increased activity on climate change. IIGCC is the focus of our public policy work on climate change.

- 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 Financial Action in the 21st Century
- Principles for Sustainable Insurance
- Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify

UKSIF/ Eurosif

<b>Your organisation's role in the initiative during the reporting period (see definitions)</b>
Advanced

<b>Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]</b>
<p>We have been closely involved in UKSIF strategy. We meet regularly with the CEO of UKSIF.</p> <p>We are active members, and were accredited under the EUROSIF European SRI Transparency Code for the sixth consecutive year in 2019/20.</p> <p>A member of the RI team represents EdenTree on the UKSIF analyst advisory committee.</p>

- 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

Access to Medicines Index

<b>Your organisation's role in the initiative during the reporting year (see definitions)</b>
Basic

<b>Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]</b>
<p>We are an investor signatory to the Index and use it extensively to inform sector engagement. It is a key aspect of our positive pillar on healthcare.</p> <p>We published an Expert Briefing on the 2018 Index results and outlined how the ATMI is used within the screening and engagement process. We joined several collaborative investor calls.</p>

- Other collaborative organisation/initiative, specify

WDI

<b>Your organisation's role in the initiative during the reporting year (see definitions)</b>
Advanced

<b>Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]</b>
<p>We are an investor signatory to the WDI (Workforce Disclosure Initiative) and actively participate in the collaborative engagement with companies.</p> <p>We have been supporters of the initiative from the beginning and have also provided input in the survey development and engagement ideas. In 2019 we became a member of the WDI advocate group.</p>

- Other collaborative organisation/initiative, specify

Business Benchmark on Farm Animal Welfare

<b>Your organisation's role in the initiative during the reporting year (see definitions)</b>
Advanced

<b>Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]</b>
<p>We have worked closely with the organisers on the development of the initiative and continue to provide investor feedback as the initiative develops, in particular we promoted the idea of an investor statement, which was launched during 2016. We use the Benchmark to inform our own engagement and participate in collaborative engagements based on the outcome rankings of the Benchmark. We are part of an active coalition focused on anti-biotic resistance.</p>

- Other collaborative organisation/initiative, specify

30% Club

<b>Your organisation's role in the initiative during the reporting year (see definitions)</b>
Advanced

<b>Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]</b>
<p>We are investor steering group members of the 30% Club, and attend investor meetings and other investor led-initiatives. Diversity has been fully integrated into UK and overseas voting and we have collaborated with the Hampton Alexander Review in providing investor comment and feedback. We have signed the 30% club Investor Group's Statement of Intent and lead/support direct engagement with companies.</p>

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.)

Description

We hosted various responsible investment presentations for clients and prospects.

Frequency of contribution

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

- 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

We challenge various organisations to be more transparent about responsible investment practices such as the Investment Association, the FRC and the FCA.

Frequency of contribution

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

- Spoke publicly at events and conferences to promote responsible investment

Description

Spoke at various industry events including Good Money Week and at the Sustainable & Social Investing Conference

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

Description

We publish three Amity Insights annually as well as various RI Expert Briefings and articles/blogs on the issues that are material for responsible investors.

Frequency of contribution

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

- Encouraged the adoption of the PRI
- Responded to RI related consultations by non-governmental organisations (OECD, FSB etc.)

Description
We responded to the Investment Association consultation on responsible and sustainable investment. We also participated in various FSB TCFD consultation roundtables with three different sectors. We also participated in a London Stock Exchange consultation on transition bonds.
Frequency of contribution
<input type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input checked="" type="radio"/> Ad hoc <input type="radio"/> Other
<input checked="" type="checkbox"/> Wrote and published articles on responsible investment in the media
Description
Various articles and opinion pieces published in the investment trade press.
Frequency of contribution
<input type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input checked="" type="radio"/> Ad hoc <input type="radio"/> Other
<input type="checkbox"/> A member of PRI advisory committees/ working groups, specify
<input checked="" type="checkbox"/> On the Board of, or officially advising, other RI organisations (e.g. local SIFs)
Description
EIM is represented on the UKSIF Analyst Advisory Committee, whose aim is to deliver UKSIF's mission to support its members to grow sustainable and responsible investment in the UK.
Frequency of contribution
<input checked="" type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input type="radio"/> Ad hoc <input type="radio"/> Other
<input type="checkbox"/> Other, specify
<input type="radio"/> No

**SG 10.3** Describe any additional actions and initiatives that your organisation has taken part in during the reporting year to promote responsible investment [Optional]

We promote RI as thought leaders within the industry through written research, articles and comment as well as public speaking at client and other events. This includes:

Three Amity Insights annually: <https://www.edentreeim.com/insight-news>

Five or more RI Expert Briefs annually: <https://www.edentreeim.com/literature>

Quarterly RI Activity Report: <https://www.edentreeim.com/literature>

Quarterly Proxy Voting Report: <https://www.edentreeim.com/literature>

Annual Responsible Investment Activity Report (2019): <https://www.edentreeim.com/literature>

Professional articles and market comments

Regular use of social media to promote RI themes and news

We provided training on RI to trustees in the form of RI Masterclasses.

SG 11	Voluntary	Additional Assessed	PRI 4,5,6
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**SG 11.1** Indicate if your organisation - individually or in collaboration with others - conducted dialogue with public policy makers or regulators in support of responsible investment in the reporting year.

Yes

**If yes**

Yes, individually

Yes, in collaboration with others

SG 11.2 Select the methods you have used.

- Endorsed written submissions to governments, regulators or public policy-makers developed by others
- Drafted your own written submissions to governments, regulators or public-policy makers
- Participated in face-to-face meetings with government members or officials to discuss policy
- Other, specify

SG 11.3 Where you have made written submissions (individually or collaboratively) to governments and regulatory authorities, indicate if these are publicly available.

- Yes, publicly available
- No

No

SG 11.4 Provide a brief description of the main topics your organisation has engaged with public policy-makers or regulators on.

We participated in public policy mostly on climate issues. This included continued support for IIGCC's Global Investor Statement to Governments on climate change which was delivered at the G20 in June 2019. IIGCC also represented the investor voice in the UK through a letter to the Chancellor of the Exchequer in support of the UK net zero emissions target.

SG 12 Mandatory Core Assessed PRI 4

SG 12.1 Indicate whether your organisation uses investment consultants.

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

SG 13 Mandatory Descriptive PRI 1

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

- Yes, in order to assess future ESG factors
- Yes, in order to assess future climate-related risks and opportunities
- No, our organisation does not currently carry out scenario analysis and/or modelling

SG 13.3 Additional information. [OPTIONAL]

In 2018, we began looking at the percentage of companies in our portfolios that had set science-based targets as a way to assess climate risk at a portfolio level. We also carbon footprint our portfolios and look at the CDP scores of companies in the portfolios.

SG 14 Mandatory to Report, Voluntary to Disclose Additional Assessed PRI 1

SG 14.1 Some investment risks and opportunities arise as a result of long term trends. Indicate which of the following are considered.

- Changing demographics
- Climate change
- Resource scarcity
- Technological developments
- Other, specify(1)
- Other, specify(2)
- None of the above

SG 14.2 Indicate which of the following activities you have undertaken to respond to climate change risk and opportunity

- Established a climate change sensitive or climate change integrated asset allocation strategy
- Targeted low carbon or climate resilient investments
- Phase out your investments in your fossil fuel holdings
- Reduced portfolio exposure to emissions intensive or fossil fuel holdings
- Used emissions data or analysis to inform investment decision making
- Sought climate change integration by companies
- Sought climate supportive policy from governments
- Other, specify
- None of the above

SG 14.3 Indicate which of the following tools the organisation uses to manage climate-related risks and opportunities.

- Scenario analysis
- Disclosures on emissions risks to clients/trustees/management/beneficiaries
- Climate-related targets
- Encouraging internal and/or external portfolio managers to monitor emissions risks
- Emissions-risk monitoring and reporting are formalised into contracts when appointing managers

- Weighted average carbon intensity
- Carbon footprint (scope 1 and 2)
- Portfolio carbon footprint
- Total carbon emissions
- Carbon intensity
- Exposure to carbon-related assets
- Other emissions metrics
- Other, specify

other description
Climate disclosure
<input type="checkbox"/> None of the above

**SG 14.4** If you selected disclosure on emissions risks, list any specific climate related disclosure tools or frameworks that you used.

In 2016 we signed the Montréal Pledge and committed to disclose publicly the emissions related to our equity investments. We developed a transparent reporting framework which is available for each equity fund on our website.

Disclosure includes emissions financed by the fund, carbon intensity compared to the fund's benchmark as well as detailed emissions at company level for the highest emitters in each fund.

<https://www.edentreeim.com/literature>

**SG 14.5** Additional information [Optional]

In 2016 we conducted our first externally verified carbon footprint for some of our equity funds. This has allowed us to improve risk management associated with climate change, providing fund managers with carbon intensity data for the first time, and informing our subsequent engagement activities in this area.

SG 14 CC	Voluntary	General
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**SG 14.6 CC** Provide further details on the key metric(s) used to assess climate-related risks and opportunities.

Metric Type	Coverage	Purpose	Metric Unit	Metric Methodology
<b>Portfolio carbon footprint</b>	Minority of assets	Assess leaders and laggards in portfolio	TCO2 / £ invested	Outsourced to CDP
<b>Total carbon emissions</b>	Minority of assets	Assess company's impact on climate	TCO2 emitted	As disclosed by the company in annual report or to CDP
<b>Carbon intensity</b>	Minority of assets	Allows sector comparison	TCO2 compared to sales	Provided by Sustainalytics in 2019

**SG 14.8 CC** Indicate whether climate-related risks are integrated into overall risk management and explain the risk management processes used for identifying, assessing and managing climate-related risks.

- Processes for climate-related risks are integrated into overall risk management

Please describe
Screenings of prospective investment ideas and reviews of existing holdings, as well as the results of carbon footprints are shared with the investment team and fund managers to inform decision making. Climate risks related to emissions are flagged to fund managers at both company level and portfolio level.

- Processes for climate-related risks are not integrated into overall risk management

**SG 14.9 CC** Indicate whether your organisation, and/or external investment manager or service providers acting on your behalf, undertake active ownership activities to encourage TCFD adoption.

- Yes

Please describe
We have encouraged companies to provide transparent disclosure on greenhouse gas emissions in line with the TCFD recommendation. This has included engagement on oversight of climate risk, measurement and management of emissions, initiatives to reduce emissions as well as long-term emission reduction targets.

- No, we do not undertake active ownership activities.
- No, we do not undertake active ownership activities to encourage TCFD adoption.

SG 15	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1
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**SG 15.1** Indicate if your organisation allocates assets to, or manages, funds based on specific environmental and social themed areas.

- Yes

**SG 15.2** Indicate the percentage of your total AUM invested in environmental and social themed areas.

15%

**SG 15.3** Specify which thematic area(s) you invest in, indicate the percentage of your AUM in the particular asset class and provide a brief description.



Area

- Energy efficiency / Clean technology
- Renewable energy
- Green buildings
- Sustainable forestry
- Sustainable agriculture
- Microfinance
- SME financing
- Social enterprise / community investing
- Affordable housing

Asset class invested

- Listed equity
  - 1Percentage of AUM (+/-5%) per asset class invested in the area
- Fixed income - SSA
- Fixed income - Corporate (financial)
- Fixed income - Corporate (non-financial)
  - 1Percentage of AUM (+/-5%) per asset class invested in the area
- Fixed income - Securitised
- Property
- Cash
- Other (1)

Brief description and measures of investment

Although we have exposure to most of the themes listed in this question, for our Amity Funds we assess four sustainability/thematic areas, which are: education, health and wellbeing, social infrastructure and sustainable solutions. Within the Amity Funds, approximately less than 5% is invested in social infrastructure which includes social and affordable housing and urban regeneration infrastructure. We do not measure the exact %.

- Education

Asset class invested

- Listed equity
  - 1Percentage of AUM (+/-5%) per asset class invested in the area
- Fixed income - SSA
- Fixed income - Corporate (financial)
- Fixed income - Corporate (non-financial)
- Fixed income - Securitised
- Property
- Cash
- Other (1)

Brief description and measures of investment

Although we have exposure to most of the themes listed in this question, for our Amity Funds we assess four sustainability/thematic areas, which are: education, health & wellbeing, social infrastructure and sustainable solutions. Within the Amity Funds, approximately less than 5% is invested in education. We do not measure the exact %.

- Global health

Asset class invested

- Listed equity
  - 9Percentage of AUM (+/-5%) per asset class invested in the area
- Fixed income - SSA
- Fixed income - Corporate (financial)
- Fixed income - Corporate (non-financial)
  - 0Percentage of AUM (+/-5%) per asset class invested in the area
- Fixed income - Securitised
- Property
- Cash
- Other (1)

Brief description and measures of investment

Although we have exposure to most of the themes listed in this question, for our Amity Funds we assess four sustainability/thematic areas, which are: education, health & wellbeing, social infrastructure and sustainable solutions. Within the Amity Funds, approximately less than 10% is invested in health a wellbeing. We do not measure the exact %.

- Water
- Other area, specify

Sustainable solutions includes various themes: circular economy, energy efficiency, green buildings, pollution prevention control, renewables, safety & security, sustainable agriculture, sustainable transport, sustainable waste and water.

Asset class invested
<input checked="" type="checkbox"/> Listed equity 4Percentage of AUM (+/-5%) per asset class invested in the area
<input type="checkbox"/> Fixed income - SSA <input type="checkbox"/> Fixed income - Corporate (financial) <input checked="" type="checkbox"/> Fixed income - Corporate (non-financial) 4Percentage of AUM (+/-5%) per asset class invested in the area
<input type="checkbox"/> Fixed income - Securitised <input type="checkbox"/> Property <input type="checkbox"/> Cash <input type="checkbox"/> Other (1)
Brief description and measures of investment
Although we have exposure to most of the themes listed in this question, for our Amity Funds we assess four sustainability/thematic areas, which are: education, health & wellbeing, social infrastructure and sustainable solutions. Within the Amity Funds, approximately less than 5% is invested in sustainable solutions. We do not measure the exact %.

No

SG 18	Voluntary	Descriptive	General
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**SG 18.1** Indicate whether any specific features of your approach to responsible investment are particularly innovative.

Yes

**SG 18.2** Describe any specific features of your approach to responsible investment that you believe are particularly innovative.

We view our approach to be innovative in three ways:

- We are a pioneer in Responsible Investment in the UK, launching the second screened equity retail Fund in 1988
- We have always operated an integrated process so that ESG is analysed in parallel with financial analysis
- We are predominately research led, publishing three thematic research pieces annually (Amity Insight) complemented by five or six RI Expert Briefings on specific ESG topics.

Our approach has been recognised in our winning the Moneyfacts Best Ethical Investment Provider Award for eleven successive years (2009-2019).

In 2016, our Amity Insight on Natural Capital also won the award for Best Thought Leadership Paper on Sustainable Investment at the Investment Week Sustainable Investment Awards.

No

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

Listed equity - Incorporation

Do you disclose?

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

The information disclosed to clients/beneficiaries is the same

- Yes
- No

Disclosure to public and URL

Disclosure to public and URL

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

Quarterly or more frequently

<https://www.edentreeim.com/insights#governance>

Listed equity - Engagement

Do you disclose?

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

The information disclosed to clients/beneficiaries is the same

- Yes
- No

Disclosure to public and URL

Disclosure to public and URL

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

Quarterly or more frequently

<https://www.edentreeim.com/insights#governance>

Listed equity – (Proxy) Voting

Do you disclose?

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

The information disclosed to clients/beneficiaries is the same

- Yes
- No

Disclosure to public and URL

Disclosure to public and URL

- Disclose all voting decisions
- Disclose some voting decisions
- Only disclose abstentions and votes against management

Quarterly or more frequently

<http://www.edentreeim.com/insights#governance>

Fixed income

Do you disclose?

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

The information disclosed to clients/beneficiaries is the same

- Yes
- No

<b>Disclosure to public and URL</b>	
Disclosure to public and URL	
<input type="checkbox"/> Broad approach to RI incorporation	
<input checked="" type="checkbox"/> Detailed explanation of RI incorporation strategy used	
Quarterly	
<a href="https://www.edentreeim.com/literature">https://www.edentreeim.com/literature</a>	

Property

Do you disclose?

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

<b>Disclosure to clients/beneficiaries</b>	
Disclosure to clients/beneficiaries	
<input type="checkbox"/> ESG information on how you select property investments	
<input checked="" type="checkbox"/> ESG information on how you monitor and manage property investments	
<input type="checkbox"/> Information on your property investments' ESG performance	
<input type="checkbox"/> Other	
Quarterly or more frequently	

SG Checks

Checks

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

**LEI 01.1** Indicate which ESG incorporation strategy and/or combination of strategies you apply to your actively managed listed equities; and the breakdown of your actively managed listed equities by strategy or combination of strategies.

- 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)
 

Percentage of active listed equity to which the strategy is applied – you may estimate +/- 5%	43%
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- Screening and integration strategies
 

Percentage of active listed equity to which the strategy is applied – you may estimate +/- 5%	12%
---	-----
- Thematic and integration strategies
- Screening and thematic strategies
- All three strategies combined
 

Percentage of active listed equity to which the strategy is applied – you may estimate +/- 5%	45%
---	-----
- We do not apply incorporation strategies

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

Voting and engagement apply to all our funds, whilst screening and ESG integration depend on the client's mandate.

**LEI 02.1** Indicate what ESG information you use in your ESG incorporation strategies and who provides this information.

- Raw ESG company data
  - ESG research provider
  - Sell-side
  - In-house – specialised ESG analyst or team
  - In-house – analyst or portfolio manager
- Company-related analysis or ratings
  - ESG research provider
  - Sell-side
  - In-house – specialised ESG analyst or team
  - In-house – analyst or portfolio manager
- Sector-related analysis or ratings
  - ESG research provider
  - Sell-side
  - In-house – specialised ESG analyst or team
  - In-house – analyst or portfolio manager
- Country-related analysis or ratings
  - ESG research provider
  - Sell-side
  - In-house – specialised ESG analyst or team
  - In-house – analyst or portfolio manager
- Screened stock list
- ESG issue-specific analysis or ratings
  - ESG research provider
  - Sell-side
  - In-house – specialised ESG analyst or team
  - In-house – analyst or portfolio manager
- Other, specify

**LEI 02.2** Indicate whether you incentivise brokers to provide ESG research.

- Yes
- No

**LEI 03.1** Indicate whether your organisation has a process through which information derived from ESG engagement and/or (proxy) voting activities is made available for use in investment decision-making.

- Engagement
  - We have a systematic process to ensure the information is made available.
  - We occasionally make this information available.
  - We do not make this information available.
- (Proxy) voting
  - We have a systematic process to ensure the information is made available.
  - We occasionally make this information available.
  - We do not make this information available.

**LEI 03.2** Additional information. [Optional]

Engagement: on a bi-weekly basis the RI Team provides the fund management team with an update on recent engagement activities. This includes a summary of the engagement and the outcome and we also make any meeting or call notes available. It also details changes in controversy ratings and provides controversy alerts.

Voting: The RI Team makes voting recommendations, they are then signed off by the relevant fund manager. All voting actions against management recommendations are explained and reported to fund managers in a daily email. A quarterly summary report is also distributed.

**LEI 04** **Mandatory** **Descriptive** **PRI 1**

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

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

**Description**

The Amity Funds apply a default 'Ethics/Values' screen ('exclusion criteria') in which companies in the following business areas are excluded where turnover or profit (whichever is higher) exceed 10%:

- Alcohol production
- Gambling operations
- Pornographic & violent materials
- Defence (arms / weapons)
- Tobacco production

We have taken a zero tolerance approach to oil sands and Arctic drilling. Specific policies have also been developed on animal testing, intensive farming, and oppressive regimes. These are available on request, and these issues also form part of the 'Ethics/Values' part of the screening/review process.

Other exclusion criteria may be used depending on the client. Additional screens applied to some portfolios include fur and exotic leather, nuclear power generation and tobacco retail.

- Positive/best-in-class screening
  - Product
  - Activity
  - Sector
  - Country/geographic region
  - Environmental and social practices and performance
  - Corporate governance

**Description**

For our Amity Fund range we apply the following process: We assess investment ideas across six areas of business risk (responsibility/ESG), which inform our decisions as to whether a company is suitable for inclusion in the Amity funds, or not. The Responsibility/ESG risk criteria can also act as a brake on investment.

- Business Ethics* – following ethical practices towards customers, including maintaining product quality, ethical sources of supply, opposing corruption and respecting indigenous peoples.
- Community* – making charitable donations, employing local people, offering work placement schemes.
- Corporate Governance* – compliance with local 'market best practice'; an overall commitment to the standards of good governance practice and process.
- Environmental Management* – supporting biodiversity, managing their climate change impact and carbon footprint, water conservation, air pollution and managing waste and recycling and supporting renewable energy.
- Employment & Labour* – promoting equal opportunity and diversity, health and safety, transparent pay structure, union participation, professional development, employee participation, whistleblower protection
- Human Rights* – supporting basic human rights by adopting the United Nations Universal Declaration of Human Rights and appropriate international instruments and protocols.

Finally, we look at companies through a Sustainability/Thematic lens: this includes Education, Health & Wellbeing, Social infrastructure and Sustainable Solutions.

- Norms-based screening
  - UN Global Compact Principles
  - The UN Guiding Principles on Business and Human Rights
  - International Labour Organization Conventions
  - United Nations Convention Against Corruption
  - OECD Guidelines for Multinational Enterprises
  - Other, specify

UN Convention on the Rights of the Child

Description
We do not screen specifically or solely on a norms-based approach, but international norms such as UDHR, ILO and the UN Global Compact are all integrated as part of our screening process.

**LEI 04.2** Describe how you notify clients and/or beneficiaries when changes are made to your screening criteria.

The Amity screening criteria are part of the Funds' Articles of Association and were established at fund launch. Our independent Amity Panel is responsible for reviewing the criteria. During 2016 we gathered feedback from key clients at a RI focus group we led in-house. This provided useful insights and led to a refreshment of how we articulate our process in 2017 by integrating nutrition, diet and wellness into our Healthcare pillar, which was renamed Health & Wellbeing. During 2018, we also listened to client feedback and their interest in sustainability, which is now articulated in more detail in our new approach that was launched in early 2019; this focuses on three elements: ethics/values (exclusions) Responsibility/ESG (risk) and Thematic/Sustainability. In 2019 we held two focus groups with clients to discuss specific ethical issues via company examples and how we apply the screens. This was intended to gather client's views on specific screening situations covering company activities and behaviours.

**LEI 05** Mandatory Core Assessed PRI 1

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

- 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.
- Trading platforms blocking / restricting flagged securities on the black list.
- A committee, body or similar with representatives independent of the individuals who conduct company research reviews some or all screening decisions.
- A periodic review of internal research is carried out.
- Review and evaluation of external research providers.
- Other; specify
- None of the above

**LEI 05.2** Indicate the proportion of your actively managed listed equity portfolio that is subject to comprehensive ESG research as part your ESG screening strategy.

- <10%
- 10-50%
- 51-90%
- >90%

**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 05.4** Indicate how frequently you review internal research that builds your ESG screens.

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

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

Screening is conducted in-house, using Sustainalytics research data (in 2019), publicly available information and/or engagement with the company. Sustainalytics sends research reports to companies for feedback and our in-house RI Team regularly engages with companies to obtain additional disclosure.

Screening responsibilities are separated from investment decision making, which reduces conflicts of interests. Company screenings conducted by dedicated RI staff are also peer reviewed to ensure thoroughness.

Our independent Amity Panel also provides feedback on our research process. The Panel meets three times a year and stock ideas, including thorough ESG analysis is discussed.

Our trading system Charles River is updated at least annually to ensure data on exclusions is up-to-date.

LEI 06	Voluntary	Additional Assessed	PRI 1
LEI 06.1	Indicate which processes your organisation uses to ensure fund criteria are not breached.		
	<input checked="" type="checkbox"/> Systematic checks are performed to ensure that stocks meet the fund's screening criteria <input checked="" type="checkbox"/> Automated IT systems prevent investment managers from investing in excluded stocks or those that do not meet positive screening criteria <input checked="" type="checkbox"/> Audits of fund holdings are undertaken regularly by internal audit function <input type="checkbox"/> Periodic auditing/checking of the organisations RI funds by external party <input type="checkbox"/> Other; specify <input type="checkbox"/> None of the above		
LEI 06.2	If breaches of fund screening criteria are identified, describe the process followed to correct those breaches.		
	<p>We have integrated the 'Charles River system'; this places automatic exclusion tags on excluded stocks preventing fund managers from dealing. It also ensures fund managers will be unable to trade in an unscreened stock that has not been signed off by the RI Team. The RI Team is the ultimate guardian of screening decisions.</p> <p>Companies that fall into breach (e.g. they acquire a business that exceeds the negative screen threshold) would be sold down over a period of time. Each stock has to 'earn' its place in the portfolio based on its positive Responsibility/ESG credentials, hence breaches of positive criteria are rare. Should breaches occur, the stock can be proscribed in the Charles River system, which will require it to be sold down over a period of time and will prevent further investment (normally three calendar months). Stocks are monitored on an ongoing basis to ensure they continue to meet the Funds' positive criteria.</p> <p>We keep an updated database of excluded stocks, which is uploaded into the Charles River system on a regular basis. Random checks are carried out by compliance as part of our internal audit function.</p> <p>All transactions are monitored by our compliance team. New acquisitions and any sales on Ethics/Values or Responsibility/ESG grounds are also discussed at Amity Panel meetings.</p> <p>The process is explained on the website as well.</p>		

LEI 07	Mandatory	Descriptive	PRI 1
LEI 07.1	Indicate the type of sustainability thematic funds or mandates your organisation manages.		
	<input type="checkbox"/> Environmentally themed funds <input type="checkbox"/> Socially themed funds <input checked="" type="checkbox"/> Combination of themes		
LEI 07.2	Describe your organisation's processes relating to sustainability themed funds. [Optional]		
	<p>We do not manage themed funds. However, our Amity Funds do apply a discretionary thematic approach. In addition to Ethics/Values and Responsibility/ESG being taken into account, we also look at companies from a Sustainability/Thematic angle.</p> <p>We look at the following themes:</p> <p>Education: education, training, human development, promoting girls education, student housing and support</p> <p>Health &amp; Wellbeing: affordable healthcare, access to medicine, pharmaceuticals R&amp;D, biotechnology, critical care, nutrition &amp; wellbeing</p> <p>Social Infrastructure: social housing, affordable housing, community &amp; housing associations, urban regeneration, brownfield development, public facilities</p> <p>Sustainable Solutions: products &amp; solutions, circular economy, sustainable development goals, impact investing (fixed income), Amity thought leadership.</p>		

LEI 08	Mandatory	Core Assessed	PRI 1														
LEI 08.1	Indicate the proportion of actively managed listed equity portfolios where E, S and G factors are systematically researched as part of your investment analysis.																
	<table border="1"> <thead> <tr> <th>ESG issues</th> <th>Proportion impacted by analysis</th> </tr> </thead> <tbody> <tr> <td rowspan="4">Environmental</td> <td style="text-align: right;">Environmental</td> </tr> <tr> <td><input type="radio"/> &lt;10%</td> </tr> <tr> <td><input type="radio"/> 10-50%</td> </tr> <tr> <td><input checked="" type="radio"/> 51-90%</td> </tr> <tr> <td><input type="radio"/> &gt;90%</td> </tr> <tr> <td rowspan="4">Social</td> <td style="text-align: right;">Social</td> </tr> <tr> <td><input type="radio"/> &lt;10%</td> </tr> <tr> <td><input type="radio"/> 10-50%</td> </tr> <tr> <td><input checked="" type="radio"/> 51-90%</td> </tr> <tr> <td><input type="radio"/> &gt;90%</td> </tr> </tbody> </table>			ESG issues	Proportion impacted by analysis	Environmental	Environmental	<input type="radio"/> <10%	<input type="radio"/> 10-50%	<input checked="" type="radio"/> 51-90%	<input type="radio"/> >90%	Social	Social	<input type="radio"/> <10%	<input type="radio"/> 10-50%	<input checked="" type="radio"/> 51-90%	<input type="radio"/> >90%
ESG issues	Proportion impacted by analysis																
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Social	Social																
	<input type="radio"/> <10%																
	<input type="radio"/> 10-50%																
	<input checked="" type="radio"/> 51-90%																
<input type="radio"/> >90%																	



Corporate Governance	Corporate Governance	
	<input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> 51-90% <input type="radio"/> >90%	

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

For our Amity Funds the systematic review of any material ESG issues forms part of our overall governance process. Environmental, social and governance aspects are all covered by our screening process. Depending on the issue, a course of action, usually including engagement, may result.

We actively monitor companies on ESG issues and receive monthly updates from our research provider Sustainalytics covering ESG controversies in our investment universe.

**LEI 09 Mandatory Core Assessed PRI 1**

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

**LEI 09.2 Indicate the proportion of your actively managed listed equity portfolio that is subject to comprehensive ESG research as part your integration strategy.**

- <10%
- 10-50%
- 51-90%
- >90%

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

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

**LEI 09.4 Indicate how frequently you review internal research that builds your ESG integration strategy.**

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

**LEI 09.5 Describe how ESG information is held and used by your portfolio managers.**

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

**LEI 09.6 Additional information. [Optional]**

We track screening decisions, such as failure under the Ethics/Values screen, engagement required and any other pertinent information. RI screenings and ESG analysis are shared with the whole investment team.

The RI Team is fully integrated in the investment team; RI staff and investment analysts/fund managers work closely together and have regular meetings together.

RI staff and investment analysts/fund managers also meet companies together to discuss financial results and ESG issues simultaneously.

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

**LEI 10.1 Indicate which aspects of investment analysis you integrate material ESG information into.**

- Economic analysis

Proportion of actively managed listed equity exposed to investment analysis
<input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> 51-90% <input type="radio"/> >90%

Industry analysis

Proportion of actively managed listed equity exposed to investment analysis
<input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> 51-90% <input type="radio"/> >90%

Quality of management

Proportion of actively managed listed equity exposed to investment analysis
<input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> 51-90% <input type="radio"/> >90%

Analysis of company strategy

Proportion of actively managed listed equity exposed to investment analysis
<input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> 51-90% <input type="radio"/> >90%

- Portfolio weighting
- Security sensitivity and/or scenario analysis
- Fair value/fundamental analysis
- Other; specify

LEI 10.6	Additional information. [OPTIONAL]
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Our active approach is bottom-up and based on an integrated analysis of stock selection ideas. The ESG and economic/financial case is researched simultaneously and a recommendation made based on the qualitative outcome of both aspects.

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

LEA 01.1 Indicate whether your organisation has an active ownership policy (includes engagement and/or voting).

Yes

LEA 01.2 Attach or provide a URL to your active ownership policy.

Attachment provided:

URL provided:

[http://www.edentreeim.com/docs/default-source/governance/ri-credentials/uk-stewardship-code-statement-2020.pdf?sfvrsn=eaa651b\\_3](http://www.edentreeim.com/docs/default-source/governance/ri-credentials/uk-stewardship-code-statement-2020.pdf?sfvrsn=eaa651b_3)

LEA 01.3 Indicate what your active engagement policy covers:

#### General approach to Active Ownership

- Conflicts of interest
- Alignment with national stewardship code requirements
- Assets/funds covered by active ownership policy
- Expectations and objectives
- Engagement approach

#### Engagement

- ESG issues
- Prioritisation of engagement
- Methods of engagement
- Transparency of engagement activities
- Due diligence and monitoring process
- Insider information
- Escalation strategies
- Service Provider specific criteria
- Other, (specify)

(Proxy) voting approach

#### Voting

- ESG issues
- Prioritisation and scope of voting activities
- Methods of voting
- Transparency of voting activities
- Regional voting practice approaches
- Filing or co-filing resolutions
- Company dialogue pre/post-vote
- Decision-making processes
- Securities lending processes
- Other, (specify)

Other

None of the above

No

LEA 01.4 Do you outsource any of your active ownership activities to service providers?

Yes

LEA 01.5 Where active ownership activities are conducted by service providers, indicate whether your active ownership policy covers any of the following:

- Outline of service provider's role in implementing your organisation's active ownership policy
- Description of considerations included in service provider selection and agreements
- Identification of key ESG frameworks which service providers must follow
- Outline of information sharing requirements of service providers
- Description of service provider monitoring processes
- Other, (specify)
- None of the above

No

LEA 01.6	Additional information [optional]
<p>We believe that the way we engage with businesses enables us to make sound, responsible investment decisions and act as a powerful force for change. We form constructive relationships with the companies we are considering investing in and continue to engage with them after we have invested as part of our monitoring program. We meet companies on a one to one basis at our offices, particularly where controversies or concerns after investing become apparent. Engagement commences at the investment ideas stage and is intended to; i) gain information or clarification, ii) raise concerns and iii) raise business standards over time.</p> <p>We engage individually and collaboratively. Collaborative engagement may be through PRI work-streams or with other like-minded investor coalitions. We were involved with several PRI work-streams in 2019.</p> <p>Engagement is prioritised according to material risk factors attendant on the underlying investments and we actively monitor ethical and financial issues as part of our standard research into companies and ongoing stewardship responsibilities.</p> <p>We vote on all resolutions in all markets except where meetings are share-blocked.</p> <p>Proxies are voted; i) in house for our domestic (UK) market and ii) contracted out to a service provider (Glass Lewis &amp; Co.) to execute for all ex-UK markets, against a voting template agreed with the service provider.</p> <p>We do not stock lend. Our full voting reports are published quarterly at: <a href="https://www.edentreeim.com/literature">https://www.edentreeim.com/literature</a></p> <p>We support the principle of considered voting, believing that shareholders have a vital role to play in encouraging high standards of corporate governance from the perspective of being long-term investors.</p> <p>We will consequently endeavour to register and vote proxies at all UK meetings in which we have a shareholding. We have adopted a policy of voting in support of company management except where proposals are considered to be in breach of corporate governance best practice, or are viewed as not being in the long-term economic interests of shareholders.</p> <p>As long-term investors, we believe a pragmatic approach best fulfils the objective of building shareholder value over time. We will seek to engage proactively with companies where either existing corporate governance arrangements or management proposals cause concern.</p>	

LEA 02	Mandatory	Core Assessed	PRI 1,2,3
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LEA 02.1	Indicate the method of engagement, giving reasons for the interaction.
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Type of engagement	Reason for interaction
Individual / Internal staff engagements	<input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <input type="checkbox"/> We do not engage via internal staff
Collaborative engagements	<input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <input type="checkbox"/> We do not engage via collaborative engagements
Service provider engagements	<input type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues <input type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> To gain an understanding of ESG strategy and/or management <input checked="" type="checkbox"/> We do not engage via service providers

LEA 02.4	Additional information. [Optional]
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We engage individually and collaboratively with other investors. We have in-house capacity to engage with our holdings and believe it is our duty as active shareholders to conduct ESG engagements ourselves with our holdings. These engagements are never outsourced to third party service providers.

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

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

Individual / Internal staff engagements	<table border="1"> <tr> <th colspan="2">Individual / Internal staff engagements</th> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Geography/market of the companies</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Materiality of the ESG factors</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Exposure (size of holdings)</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Responses to ESG impacts that have already occurred</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Responses to divestment pressure</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Consultation with clients/beneficiaries</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Consultation with other stakeholders (e.g. NGOs, trade unions, etc.)</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Follow-up from a voting decision</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Client request</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Breaches of international norms</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Other; (specify)</td> </tr> <tr> <td><input type="checkbox"/></td> <td>We do not outline engagement criteria for our individual engagements</td> </tr> </table>	Individual / Internal staff engagements		<input checked="" type="checkbox"/>	Geography/market of the companies	<input checked="" type="checkbox"/>	Materiality of the ESG factors	<input checked="" type="checkbox"/>	Exposure (size of holdings)	<input checked="" type="checkbox"/>	Responses to ESG impacts that have already occurred	<input type="checkbox"/>	Responses to divestment pressure	<input checked="" type="checkbox"/>	Consultation with clients/beneficiaries	<input checked="" type="checkbox"/>	Consultation with other stakeholders (e.g. NGOs, trade unions, etc.)	<input checked="" type="checkbox"/>	Follow-up from a voting decision	<input type="checkbox"/>	Client request	<input checked="" type="checkbox"/>	Breaches of international norms	<input type="checkbox"/>	Other; (specify)	<input type="checkbox"/>	We do not outline engagement criteria for our individual engagements				
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No

**LEA 03.3** Additional information. [Optional]

Engagement commences at stock idea stage. We then prioritise engagement on the basis of it being material, adding value for clients or the potential to raise standards. This is assessed on a case-by-case basis. Engagement may also be in response to a controversy that occurs.

**LEA 04** Mandatory Core Assessed PRI 2

**LEA 04.1** Indicate whether you define specific objectives for your organisation's engagement activities.

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

**LEA 04.2** Additional information. [Optional]

We track and monitor our engagement activities on a regular basis. We generally allow three weeks for a company to respond to our initial request before following up again. We do not have specific timelines for our engagements, rather we use a more pragmatic approach. If needed we may escalate engagement or speed up discussions through the intermediary of a broker.

**LEA 05** Mandatory Core Assessed PRI 2

**LEA 05.1** Indicate whether you monitor and/or review engagement outcomes.

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

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

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

**LEA 06** Mandatory Additional Assessed PRI 2,4

**LEA 06.1** Indicate whether your organisation has an escalation strategy when engagements are unsuccessful.

Yes

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

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

No

**LEA 06.3** Additional information. [Optional]

We track and monitor our engagement activities on a regular basis. We generally allow three weeks for a company to respond to our initial request before following up again. We do not have specific timelines for our engagements, rather we use a more pragmatic approach. If needed we may escalate engagement or speed up discussions through the intermediary of a broker; we may also seek to engage collaboratively with other investors to increase influence. Where relevant, we may take action against the Board at the AGM. Divestment is always a last resort and not the preferred option unless a company breaches our fundamental ethical or ESG criteria.

**LEA 07** Voluntary Additional Assessed PRI 1,2

**LEA 07.1** Indicate whether insights gained from your organisation's engagements are shared with investment decision-makers.

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

LEA 07.2	Indicate the practices used to ensure that information and insights gained through engagements are shared with investment decision-makers.
<input type="checkbox"/> Involving investment decision-makers when developing an engagement programme <input type="checkbox"/> Holding investment team meetings and/or presentations <input type="checkbox"/> Using IT platforms/systems that enable data sharing <input type="checkbox"/> Internal process that requires portfolio managers to re-balance holdings based on interaction and outcome levels <input checked="" type="checkbox"/> Other; specify On a bi-weekly basis a summary of engagements conducted is shared with the fund management team. <input type="checkbox"/> None	

LEA 07.3	Indicate whether insights gained from your organisation's engagements are shared with your clients/beneficiaries.						
<table border="1"> <thead> <tr> <th>Type of engagement</th> <th>Insights shared</th> </tr> </thead> <tbody> <tr> <td>Individual/Internal staff engagements</td> <td> <input checked="" type="checkbox"/> Yes, systematically  <input type="checkbox"/> Yes, occasionally  <input type="checkbox"/> No           </td> </tr> <tr> <td>Collaborative engagements</td> <td> <input checked="" type="checkbox"/> Yes, systematically  <input type="checkbox"/> Yes, occasionally  <input type="checkbox"/> No           </td> </tr> </tbody> </table>		Type of engagement	Insights shared	Individual/Internal staff engagements	<input checked="" type="checkbox"/> Yes, systematically <input type="checkbox"/> Yes, occasionally <input type="checkbox"/> No	Collaborative engagements	<input checked="" type="checkbox"/> Yes, systematically <input type="checkbox"/> Yes, occasionally <input type="checkbox"/> No
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Collaborative engagements	<input checked="" type="checkbox"/> Yes, systematically <input type="checkbox"/> Yes, occasionally <input type="checkbox"/> No						

LEA 07.4	Additional information. [Optional]
We publish quarterly RI Activity Reports. These are publicly available and shared with clients and contain a summary of engagement activities conducted during the quarter. We also publish an Annual Responsible Investment Activity Report in which more qualitative data is provided.	

LEA 08	Mandatory	Gateway	PRI 2
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LEA 08.1	Indicate whether you track the number of your engagement activities.						
<table border="1"> <thead> <tr> <th>Type of engagement</th> <th>Tracking engagements</th> </tr> </thead> <tbody> <tr> <td>Individual/Internal staff engagements</td> <td> <input checked="" type="checkbox"/> Yes, we track the number of our engagements in full  <input type="checkbox"/> Yes, we partially track the number of our engagements  <input type="checkbox"/> We do not track           </td> </tr> <tr> <td>Collaborative engagements</td> <td> <input checked="" type="checkbox"/> Yes, we track the number of collaborative engagements in full  <input type="checkbox"/> Yes, we partially track the number of our collaborative engagements  <input type="checkbox"/> We do not track           </td> </tr> </tbody> </table>		Type of engagement	Tracking engagements	Individual/Internal staff engagements	<input checked="" type="checkbox"/> Yes, we track the number of our engagements in full <input type="checkbox"/> Yes, we partially track the number of our engagements <input type="checkbox"/> We do not track	Collaborative engagements	<input checked="" type="checkbox"/> Yes, we track the number of collaborative engagements in full <input type="checkbox"/> Yes, we partially track the number of our collaborative engagements <input type="checkbox"/> We do not track
Type of engagement	Tracking engagements						
Individual/Internal staff engagements	<input checked="" type="checkbox"/> Yes, we track the number of our engagements in full <input type="checkbox"/> Yes, we partially track the number of our engagements <input type="checkbox"/> We do not track						
Collaborative engagements	<input checked="" type="checkbox"/> Yes, we track the number of collaborative engagements in full <input type="checkbox"/> Yes, we partially track the number of our collaborative engagements <input type="checkbox"/> We do not track						

LEA 08.2	Additional information. [Optional]
All engagement is tracked internally and reported via our engagement schedule, and to clients via the Quarterly RI Activity Reports; we also publish an Annual RI Activity Report. Engagement case studies are also reported to the Amity Panel for review and in turn to the EIM Board.	

LEA 09	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 2
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LEA 09.1	Indicate the proportion of companies in your listed equities portfolio with which your organisation engaged during the reporting year.		
	<b>We did not complete any engagements in the reporting year.</b>	<b>Number of companies engaged</b> (avoid double counting, see explanatory notes)	<b>Proportion of companies engaged with, out of total listed equities portfolio</b>
Individual / Internal staff engagements	<input type="checkbox"/> We did not complete any engagements in the reporting year.	137	39
Collaborative engagements	<input type="checkbox"/> We did not complete any engagements in the reporting year.	15	4

LEA 09.2	Indicate the breakdown of engagements conducted within the reporting year by the number of interactions (including interactions made on your behalf).				
<table border="1"> <thead> <tr> <th>No. of interactions with a company</th> <th>% of engagements</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>		No. of interactions with a company	% of engagements		
No. of interactions with a company	% of engagements				

<b>One interaction</b>	<input type="radio"/> >76% <input type="radio"/> 51-75% <input checked="" type="radio"/> 11-50% <input type="radio"/> 1-10% <input type="radio"/> None
<b>2 to 3 interactions</b>	<input type="radio"/> >76% <input type="radio"/> 51-75% <input checked="" type="radio"/> 11-50% <input type="radio"/> 1-10% <input type="radio"/> None
<b>More than 3 interactions</b>	<input type="radio"/> >76% <input type="radio"/> 51-75% <input checked="" type="radio"/> 11-50% <input type="radio"/> 1-10% <input type="radio"/> None
Total	<b>100%</b>

**LEA 09.3** Indicate the percentage of your collaborative engagements in which you were the leading organisation during the reporting year.

Type of engagement	% leading role
Collaborative engagements	<input checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> None

LEA 10	Voluntary	Additional Assessed	PRI 2
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**LEA 10.1** Indicate which of the following your engagement involved.

- Letters and emails to companies
  - In a minority of cases
  - In a majority of cases
  - In all cases
- Meetings and/or calls with board/senior management
  - In a minority of cases
  - In a majority of cases
  - In all cases
- Meetings and/or calls with the CSR, IR or other management
  - In a minority of cases
  - In a majority of cases
  - In all cases
- Visits to operations
  - In a minority of cases
  - In a majority of cases
  - In all cases
- Visits to supplier(s) in supplier(s) from the company's supply chain
- Participation in roadshows
  - In a minority of cases
  - In a majority of cases
  - In all cases
- Other

**LEA 10.2** Additional information. [Optional]

All engagement is different and one size does not fit all. We engage in different ways on a case-by-case basis dependent on the size of the company, the nature of the issues and the materiality of the risk.

We use a variety of methods including letters, emails, conference calls, meetings and site visits.



LEA 11.1	Provide examples of the engagements that your organisation or your service provider carried out during the reporting year.
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Add Example 1

ESG Topic	<input checked="" type="checkbox"/> Climate Change
Conducted by	Individual / Internal
Objectives	We engaged on climate change to understand where this fits within the companies' materiality framework, how they assess climate change and how they are managing the risk. We engaged with banks specifically to encourage alignment with the goals of the Paris agreement.
Scope and Process	During the year we engaged with various companies on climate change, both in heavy emitting sectors and in sectors that have a more indirect exposure to climate change. We engaged with 15 banks on fossil fuel project finance and encouraged alignment of loan books with the Paris agreement. Banks recognise the challenges, some have policies not to finance new projects, but general finance to companies with fossil fuel exposure is often not addressed. More progress is needed on mapping loan books to the Paris Agreement goals, some banks have started. Most banks are open to have this conversation with investors. Where banks have refused to engage we will be supporting climate resolutions in 2020.
Outcomes	Ongoing

Add Example 2

ESG Topic	<input checked="" type="checkbox"/> Human rights
Conducted by	Collaborative
Objectives	We engaged with companies with exposure to cobalt (especially cobalt originating from the Democratic Republic of the Congo. ) in their supply chains, to gain an understanding of current practices, and encourage greater transparency and enhanced due diligence.
Scope and Process	We participated in the collaborative engagement stream on cobalt sourcing practices with the PRI and lead the engagement with Infineon. Unfortunately, the company declined to engage, responding that they do not deal with individual shareholder requests.
Outcomes	Failed/no outcome

Add Example 3

ESG Topic	<input checked="" type="checkbox"/> Other governance
Conducted by	Individual / Internal
Objectives	We engaged with a number of AIM stocks that we invest in to encourage better governance practices.
Scope and Process	AIM listed companies are not required to abide by the UK Corporate Governance Code, and generally have weaker standards of governance compliance. We asked several companies to put directors forward for annual election (rather than retirement by rotation) and to put their remuneration to vote. All companies we contacted agreed to review their practices with a Board decision. Three agreed to move to annual election of directors. Most indicated that we were the first shareholders to make this request.
Outcomes	Company committed to change

- Add Example 4
- Add Example 5
- Add Example 6
- Add Example 7
- Add Example 8
- Add Example 9
- Add Example 10

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

Approach
----------

- We use our own research or voting team and make voting decisions without the use of service providers.

We hire service providers who make voting recommendations and/or provide research that we use to guide our voting decisions.

Based on
<input type="radio"/> The service-provider voting policy we sign off on
<input checked="" type="radio"/> Our own voting policy
<input type="radio"/> Our clients' requests or policies
<input type="radio"/> Other (explain)

We hire service providers who make voting decisions on our behalf, except in some pre-defined scenarios where we review and make voting decisions.

We hire service providers who make voting decisions on our behalf.

<b>LEA 12.2</b>	<b>Provide an overview of how you ensure that your agreed-upon voting policy is adhered to, giving details of your approach when exceptions to the policy are made.</b>
-----------------	---

Our domestic UK market is voted in-house without proxy advisors, we use IVIS (Institutional Voting Information Service) research to inform our voting decisions. Overseas voting is contracted out to a voting service provider (Glass Lewis & Co.) who execute all non-UK ballots. Manual interventions may be used on overseas voting to override the service provider recommendation.

More information on our approach to voting is disclosed in our UK Stewardship Code statement:

[https://www.edentreeim.com/docs/default-source/governance/ri-credentials/uk-stewardship-code-statement-2020.pdf?sfvrsn=aaa651b\\_3](https://www.edentreeim.com/docs/default-source/governance/ri-credentials/uk-stewardship-code-statement-2020.pdf?sfvrsn=aaa651b_3)

Our UK and overseas corporate governance policies are publicly available:

[http://www.edentreeim.com/docs/default-source/governance/ri-credentials/corporate-governance-policy-2020.pdf?sfvrsn=2c6665f0\\_0](http://www.edentreeim.com/docs/default-source/governance/ri-credentials/corporate-governance-policy-2020.pdf?sfvrsn=2c6665f0_0)

[http://www.edentreeim.com/docs/default-source/governance/ri-credentials/corporate-governance-policy-ex-uk-2020.pdf?sfvrsn=2f5f0dc3\\_0](http://www.edentreeim.com/docs/default-source/governance/ri-credentials/corporate-governance-policy-ex-uk-2020.pdf?sfvrsn=2f5f0dc3_0)

<b>LEA 14</b>	<b>Voluntary</b>	<b>Additional Assessed</b>	<b>PRI 2</b>
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<b>LEA 14.1</b>	<b>Does your organisation have a securities lending programme?</b>
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- Yes
- No

<b>LEA 14.2</b>	<b>Describe why your organisation does not lend securities.</b>
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It is House policy not to stock lend. We are long-term investors seeking to deliver "Profits with Principles" for clients who invest their capital with us. We view stock lending as a short-term expedient that can affect and influence short-selling in the market to the detriment of long-term investors. We vote at all meetings in all jurisdictions, and stock-lending would require stocks to be recalled to allow us to exercise our stewardship rights.

<b>LEA 15</b>	<b>Mandatory</b>	<b>Descriptive</b>	<b>PRI 2</b>
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<b>LEA 15.1</b>	<b>Indicate the proportion of votes participated in within the reporting year in which where you or the service providers acting on your behalf raised concerns with companies ahead of voting.</b>
-----------------	---

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

<b>LEA 15.2</b>	<b>Indicate the reasons for raising your concerns with these companies ahead of voting.</b>
-----------------	---

- Vote(s) concerned selected markets
- Vote(s) concerned selected sectors
- Vote(s) concerned certain ESG issues
- Vote(s) concerned companies exposed to controversy on specific ESG issues
- Vote(s) concerned significant shareholdings
- Client request
- Other

<b>Explain</b>
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Where resolutions put forward are significantly in contravention with our voting policies.

<b>LEA 15.3</b>	<b>Additional information. [Optional]</b>
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This is resource intensive and hitherto we have not informed companies routinely of our voting decisions. Occasional communication is undertaken on particularly controversial votes, especially in the UK market. We take part in remuneration or other governance consultations where we are: i) a notifiable shareholder, or ii) invited to take part as part of an Investment Association (IA) consultation.

<b>LEA 16</b>	<b>Mandatory</b>	<b>Core Assessed</b>	<b>PRI 2</b>
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LEA 16.1	Indicate the proportion of votes where you, and/or the service provider(s) acting on your behalf, communicated the rationale to companies for abstaining or voting against management recommendations. Indicate this as a percentage out of all eligible votes.
<input type="radio"/> 100% <input type="radio"/> 99-75% <input type="radio"/> 74-50% <input type="radio"/> 49-25% <input checked="" type="radio"/> 24-1% <input type="radio"/> We do not communicate the rationale to companies <input type="radio"/> Not applicable because we and/or our service providers did not abstain or vote against management recommendations	

LEA 16.2	Indicate the reasons why your organisation would communicate to companies, the rationale for abstaining or voting against management recommendations.		
<input checked="" type="checkbox"/> Vote(s) concern selected markets <input type="checkbox"/> Vote(s) concern selected sectors <input checked="" type="checkbox"/> Vote(s) concern certain ESG issues <input type="checkbox"/> Vote(s) concern companies exposed to controversy on specific ESG issues <input type="checkbox"/> Vote(s) concern significant shareholdings <input type="checkbox"/> Client request <input checked="" type="checkbox"/> Other			
<table border="1"> <tr> <td>Explain</td> </tr> <tr> <td>Where resolutions put forward are significantly in contravention with our voting policy.</td> </tr> </table>		Explain	Where resolutions put forward are significantly in contravention with our voting policy.
Explain			
Where resolutions put forward are significantly in contravention with our voting policy.			

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

LEA 17	Mandatory	Core Assessed	PRI 2
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LEA 17.1	For listed equities in which you or your service provider have the mandate to issue (proxy) voting instructions, indicate the percentage of votes cast during the reporting year.		
<input checked="" type="radio"/> We do track or collect this information			
<table border="1"> <tr> <td>Votes cast (to the nearest 1%)</td> </tr> <tr> <td>99%</td> </tr> </table>		Votes cast (to the nearest 1%)	99%
Votes cast (to the nearest 1%)			
99%			
<table border="1"> <tr> <td>Specify the basis on which this percentage is calculated</td> </tr> <tr> <td> <input type="radio"/> Of the total number of ballot items on which you could have issued instructions  <input checked="" type="radio"/> Of the total number of company meetings at which you could have voted  <input type="radio"/> Of the total value of your listed equity holdings on which you could have voted         </td> </tr> </table>		Specify the basis on which this percentage is calculated	<input type="radio"/> Of the total number of ballot items on which you could have issued instructions <input checked="" type="radio"/> Of the total number of company meetings at which you could have voted <input type="radio"/> Of the total value of your listed equity holdings on which you could have voted
Specify the basis on which this percentage is calculated			
<input type="radio"/> Of the total number of ballot items on which you could have issued instructions <input checked="" type="radio"/> Of the total number of company meetings at which you could have voted <input type="radio"/> Of the total value of your listed equity holdings on which you could have voted			
<input type="radio"/> We do not track or collect this information			

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

LEA 17.3	Additional information. [Optional]
<p>We vote in all markets without exception save in shareblocked meetings. However, in exceptional circumstances we may elect not to vote if there is insufficient information provided by the company to allow us to take an informed view. During 2018, five overseas meetings were shareblocked and not voted and two were missed.</p>	

LEA 18	Voluntary	Additional Assessed	PRI 2
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LEA 18.1	Indicate whether you track the voting instructions that you or your service provider on your behalf have issued.
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Yes, we track this information

LEA 18.2	Of the voting instructions that you and/or third parties on your behalf have issued, indicate the proportion of ballot items that were:
<p><b>Voting instructions Breakdown as percentage of votes cast</b> For (supporting) management recommendations            90%</p> <p>Against (opposing) management recommendations            9%</p> <p>Abstentions            1%</p>	

No, we do not track this information

LEA 18.3	In cases where your organisation voted against management recommendations, indicate the percentage of companies which you have engaged.
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LEA 18.4	Additional information. [Optional]
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LEA 19	Mandatory	Core Assessed	PRI 2
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LEA 19.1	Indicate whether your organisation has a formal escalation strategy following unsuccessful voting.
<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	

LEA 20	Voluntary	Descriptive	PRI 2
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LEA 20.1	Indicate whether your organisation, directly or through a service provider, filed or co-filed any ESG shareholder resolutions during the reporting year.
<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	

LEA 20.7	Additional information. [Optional]
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We have not filed or co-filed shareholder resolutions in the past three years. Our policy is to support shareholder resolutions where these are reasonable, support our wider RI approach and do not appear to have a disproportionate financial cost. Shareholder resolutions supported are fully disclosed in the quarterly voting reports.

LEA 21	Voluntary	Descriptive	PRI 2
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LEA 21.1	Provide examples of the (proxy) voting activities that your organisation and/or service provider carried out during the reporting year.
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Add Example 1

ESG Topic	<input checked="" type="checkbox"/> Executive Remuneration
Conducted by	Individual/Internal
Objectives	Remuneration should be sufficient to recruit, retain, and motivate so as to incentivise long-term superior out-performance without being excessive; it should not be designed to reward undue risk.
Scope and Process	EIM takes into account a variety of issues when looking at executive pay including, the quality of disclosure so as to allow an informed judgement to be made on the individual and aggregate elements of remuneration; whether performance hurdles are stretching and tiered towards delivering superior out-performance, and any potential for excess.  During 2019 we opposed or abstained votes on 145 remuneration reports and incentive schemes across our UK and overseas holdings. We routinely oppose over 80% of FTSE100 Remuneration Policies and Reports.
Outcomes	Voting

Add Example 2

ESG Topic	<input checked="" type="checkbox"/> Diversity
Conducted by	Individual/Internal
Objectives	EIM supports the aspiration to improve Board diversity as set out in the UK Hampton-Alexander Review, 'FTSE Women Leaders'. We look to FTSE350 companies to report progress on how they expect to meet a minimum target of 33% women on boards by 2020.
Scope and Process	We engaged with FTSE 350 companies on diversity to encourage them to make progress and integrate gender diversity into the voting policy. In 2019, we opposed the re-election of eight Chairs of Nomination Committees of FTSE350 companies, where insufficient progress has been made on gender diversity.
Outcomes	Voting

Add Example 3

ESG Topic	<input checked="" type="checkbox"/> Other governance
Conducted by	Individual/Internal
Objectives	We believe companies should rotate their auditors every 10 years.
Scope and Process	In 2019 we opposed or abstained the re-election of auditors at UK companies in 33 cases.
Outcomes	

- Add Example 4
- Add Example 5
- Add Example 6
- Add Example 7
- Add Example 8
- Add Example 9
- Add Example 10

LEA Checks

Checks

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

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

SSA	Screening alone	0
	Thematic alone	0
	Integration alone	0
	Screening + integration strategies	0
	Thematic + integration strategies	0
	Screening + thematic strategies	0
	All three strategies combined	8
	No incorporation strategies applied	92
Corporate (financial)	Screening alone	40
	Thematic alone	0
	Integration alone	0
	Screening + integration strategies	0
	Thematic + integration strategies	0
	Screening + thematic strategies	0
	All three strategies combined	29
	No incorporation strategies applied	31
Corporate (non-financial)	Screening alone	54
	Thematic alone	0
	Integration alone	0
	Screening + integration strategies	0
	Thematic + integration strategies	0
	Screening + thematic strategies	0
	All three strategies combined	8
	No incorporation strategies applied	38

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

To be considered suitable for inclusion within our Amity range of responsible and sustainable funds, an investment idea must meet the criteria laid out by our responsible and sustainable screening model. There are three parts to this: Ethics/Values, Responsibility/ESG and Sustainability/Thematic.

The eight exclusion criteria which make up ethics/values aim to avoid activities that are harmful to society. Companies that derive more than 10% of their profits or turnover from these activities are excluded from our portfolios.

We then assess investment ideas across six areas of business risk (responsibility/ESG), which inform our decisions as to whether a company is suitable for inclusion in the Amity funds, or not. The Responsibility/ESG risk criteria can also act as a brake on investment.

Finally, we look at companies from a Sustainability/Thematic angle. This includes Education, Health & Wellbeing, Social infrastructure and Sustainable Solutions. As we screen stock ideas, we consider the positive sustainability case in terms of products and solutions. This is a discretionary part of stock selection, as not all companies provide 'sustainable solutions'

For Sovereign Bonds we look at different criteria including the level of freedom and corruption in a country, based on information from Freedom House and Transparency International.

**FI 01.3** Additional information [Optional].

For our Amity Fund range we apply the following process: we assess investment ideas across six areas of business risk (responsibility/ESG), which inform our decisions as to whether a company is suitable for inclusion in the Amity funds, or not. The Responsibility/ESG risk criteria can also act as a brake on investment

*Business Ethics* – following ethical practices towards customers, including maintaining product quality, ethical sources of supply, opposing corruption and respecting indigenous peoples.

*Community* – making charitable donations, employing local people, and offering work placement schemes.

*Corporate Governance* – compliance with local 'market best practice'; an overall commitment to the standards of good governance practice and process.

*Environmental Management* – supporting biodiversity, managing their climate change impact and carbon footprint, water conservation, air pollution and managing waste and recycling and supporting renewable energy.

*Employment & Labour* – promoting equal opportunity and diversity, health and safety, transparent pay structure, union participation, professional development, employee participation, whistleblower protection

*Human Rights* – supporting basic human rights by adopting the United Nations Universal Declaration of Human Rights and appropriate international instruments and protocols.

Finally, we look at companies through a thematic/sustainability lens: this includes Education, Health & Wellbeing, Social infrastructure and Sustainable Solutions.

<b>FI 14</b>	<b>Mandatory to Report, Voluntary to Disclose</b>	<b>Core Assessed</b>	<b>PRI 2</b>
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**FI 14.1** Indicate the proportion of your fixed income assets on which you engage. Please exclude any engagements carried out solely in your capacity as a shareholder.

Category	Proportion of assets
<b>SSA</b>	<input type="radio"/> >50% <input type="radio"/> 26-50% <input type="radio"/> 5-25% <input checked="" type="checkbox"/> More than 0%, less than 5%  <div style="background-color: #0070C0; color: white; padding: 2px;"><b>FI 14.2</b> Indicate your motivations for conducting engagement (SSA fixed income assets).</div> <input type="radio"/> To gain an understanding of ESG strategy and/or management <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> To influence issuer practice (or identify the need to influence) on ESG issue
<b>Corporate (financial)</b>	<input type="radio"/> >50% <input checked="" type="checkbox"/> 26-50% <input type="radio"/> 5-25% <input type="radio"/> More than 0%, less than 5%  <div style="background-color: #0070C0; color: white; padding: 2px;"><b>FI 14.2</b> Indicate your motivations for conducting engagement (Corporate, Financial fixed income assets)</div> <input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> To influence issuer practice (or identify the need to influence) on ESG issue
<b>Corporate (non-financial)</b>	<input type="radio"/> >50% <input checked="" type="checkbox"/> 26-50% <input type="radio"/> 5-25% <input type="radio"/> More than 0%, less than 5%  <div style="background-color: #0070C0; color: white; padding: 2px;"><b>FI 14.2</b> Indicate your motivations for conducting engagement (Corporate, non-financial fixed income assets)</div> <input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> To influence issuer practice (or identify the need to influence) on ESG issue

FI 14.3	Additional information.[OPTIONAL]
<p>We do not differentiate between equity and fixed income. We engage at company level independent of our situation as shareholder or fixed income investor. Our statistics for engagement do not track the difference between equity and fixed income as we believe that a company faces the same ESG issues whether it issues shares or bonds.</p> <p>For SSA we occasionally participate in collaborative public policy lobbying to effect change.</p>	

FI 15	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1,2
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FI 15.1	Indicate how you typically engage with issuers as a fixed income investor, or as both a fixed income and listed equity investor. (Please do not include engagements where you are both a bondholder and shareholder but engage as a listed equity investor only.)
---------	---

Type of engagement	SSA	Corporate (financial)	Corporate (non-financial)
Individual/Internal staff engagements	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Collaborative engagements	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Service provider engagements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

FI 15.2	Indicate how your organisation prioritises engagements with issuers.
---------	--

	SSA	Corporate (financial)	Corporate (non-financial)
Size of holdings	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Credit quality of the issuer	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Duration of holdings	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Quality of transparency on ESG	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Specific markets and/or sectors	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Specific ESG themes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Issuers in the lowest ranks of ESG benchmarks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Issuers in the highest ranks of ESG benchmarks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Specific issues considered priorities for the investor based on input from clients and beneficiaries	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

FI 15.3	Indicate when your organisation conducts engagements with issuers.
---------	--

	SSA	Corporate (financial)	Corporate (non-financial)
We engage pre-investment.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We engage post-investment.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We engage proactively in anticipation of specific ESG risks and/or opportunities.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We engage in reaction to ESG issues that have already affected the issuer.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We engage prior to ESG-related divestments.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other, describe	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

FI 15.4	Indicate what your organisation conducts engagements with issuers on.
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	SSA	Corporate (financial)	Corporate (non-financial)
We engage on ESG risks and opportunities affecting a specific bond issuer or its issuer.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We engage on ESG risks and opportunities affecting the entire industry or region that the issuer belongs to.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We engage on specific ESG themes across issuers and industries (e.g., human rights).	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other, describe	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

FI 15.5	Indicate how your organisation ensures that information and insights collected through engagement can feed into the investment decision-making process.
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	SSA	Corporate (financial)	Corporate (non-financial)



Ensuring regular cross-team meetings and presentations.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sharing engagement data across platforms that is accessible to ESG and investment teams.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Encouraging ESG and investment teams to join engagement meetings and roadshows.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Delegating some engagement dialogue to portfolio managers/credit analysts.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Involving portfolio managers when defining an engagement programme and developing engagement decisions.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Establishing mechanisms to rebalance portfolio holdings based on levels of interaction and outcomes of engagements.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Considering active ownership as a mechanism to assess potential future investments.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other, describe	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We do not ensure that information and insights collected through engagement can feed into the investment decision-making process.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

FI 16 Mandatory to Report, Voluntary to Disclose Additional Assessed PRI 1,2

FI 16.1 Indicate if your publicly available policy documents explicitly refer to fixed income engagement separately from engagements in relation to other asset classes.

- Yes
- No

FI 16.3 Additional information [OPTIONAL]

We do not provide this information as we believe the ESG risks are the same for a company issuing bonds or shares. Our quarterly RI Activity Reports highlight engagement case studies with companies where we are both shareholders or fixed income investors.

We may also publish information regarding public policy lobbying; however, again we consider this to impact both equities, fixed income and SSAs in those markets, so we do not refer to a specific asset class.

Our quarterly RI Activity Reports and annual report are available on our website.  
<http://www.edentreeim.com/insights#engagement>

FI 17 Mandatory to Report, Voluntary to Disclose Additional Assessed General

FI 17.1 Indicate whether your organisation measures how your incorporation of ESG analysis in fixed income has affected investment outcomes and/or performance.

	SSA	Corporate (financial)	Corporate (non-financial)
We measure whether incorporating ESG impacts portfolio risk.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We measure whether incorporating ESG impacts portfolio returns.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We measure the ESG performance/profile of portfolios (relative to the benchmark).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

FI 17.2 Describe how your organisation measures how your incorporation of ESG analysis in fixed income has affected investment outcomes and/or ESG performance. [OPTIONAL]

Risk: we seek to invest in companies that are positive corporate citizens, delivering economic, social and environmental benefit for society and the communities in which they operate. We believe the integration of these aspects reduces risks emerging from environmental accidents, business ethics scandals or corporate governance failures.

FI 18 Voluntary Descriptive PRI 1,2

FI 18.1 Provide examples of how your incorporation of ESG analysis and/or your engagement of issuers has affected your fixed income investment outcomes during the reporting year.

- Example 1
- Example 2

SSA		
<table border="1"> <thead> <tr> <th>ESG issue and explanation</th> </tr> </thead> <tbody> <tr> <td>We screened a green bond from a quasi government transport organisation, which aimed to finance a range of eligible green projects contributing to air quality improvements, carbon, energy and climate resilience, resource management, noise reduction, natural environment, pollution prevention and the built environment.</td> </tr> </tbody> </table>	ESG issue and explanation	We screened a green bond from a quasi government transport organisation, which aimed to finance a range of eligible green projects contributing to air quality improvements, carbon, energy and climate resilience, resource management, noise reduction, natural environment, pollution prevention and the built environment.
ESG issue and explanation		
We screened a green bond from a quasi government transport organisation, which aimed to finance a range of eligible green projects contributing to air quality improvements, carbon, energy and climate resilience, resource management, noise reduction, natural environment, pollution prevention and the built environment.		
Thematic		
<table border="1"> <thead> <tr> <th>Impact on investment decision or performance</th> </tr> </thead> <tbody> <tr> <td>The green bond was added to the portfolio.</td> </tr> </tbody> </table>	Impact on investment decision or performance	The green bond was added to the portfolio.
Impact on investment decision or performance		
The green bond was added to the portfolio.		

- Example 3
- Example 4
- Example 5

PR 01	Mandatory	Core Assessed	PRI 1-6
PR 01.1	Indicate if your organisation has a Responsible Property Investment (RPI) policy.		
<input checked="" type="checkbox"/> Yes			
PR 01.2	Provide a URL or attach the document		
<input type="checkbox"/> URL <input checked="" type="checkbox"/> Attach Document			
<input type="checkbox"/> No			
PR 01.3	Provide a brief overview of your organisation's approach to responsible investment in property, and how you link responsible investment in property to your business strategy. [Optional]		
<p>During 2018, EdenTree's parent, the Ecclesiastical Insurance Group approved a responsible property policy which is being executed by EdenTree.</p>			
PR 02	Mandatory	Core Assessed	PRI 1,4,6
PR 02.1	Indicate if your most recent fund placement documents (private placement memorandums (PPMs) or similar) refer to responsible investment aspects of your organisation.		
<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable as our organisation does not fundraise			
PR 02.4	Describe why your organisation does not fundraise.		
<p>Property investment is an asset allocation decision made by the Ecclesiastical Insurance Group Board. We do not manage any property investment funds. The Group has developed this Policy with the aim of aligning, where possible, direct property investment with the Group's Ethical and Responsible Investment Policy.</p>			
PR 04	Mandatory	Gateway/Core Assessed	PRI 1
PR 04.1	Indicate if your organisation typically incorporates ESG issues when selecting property investments.		
<input checked="" type="checkbox"/> Yes			
PR 04.2	Provide a description of your organisation's approach to incorporating ESG issues in property investment selection.		
<p>We apply negative screening criteria to new investments. Properties where the tenant is wholly or mainly involved in one or more of the Group's proscribed investment exclusions would not normally be eligible for investment. These include activities wholly or mainly involved in alcohol production, gambling, tobacco, strategic weapons or pornographic or violent material.</p> <p>In addition, our investment decision process involves a review of economic, industry and company information, including relevant ESG (environmental, social and governance) factors.</p>			
PR 04.3	Indicate which E, S and/or G issues are typically considered by your organisation in the property investment selection process, and list up to three examples per issue.		
<input checked="" type="checkbox"/> Environmental			
Other			
Environmental example 1, description		Environmental risk assessments as well as energy efficiency ratings are taken into account during the investment selection.	
Contamination			
Environmental example 2, description		Contamination is part of the environmental risk assessments.	
Energy efficiency			
Environmental example 3, description		Energy efficiency is part of the environmental risk assessments.	
<input checked="" type="checkbox"/> Social			
Other			
Social example 1, description [OPTIONAL]		Social risk assessments are conducted during the investment selection process. This includes building safety and access.	
<input type="checkbox"/> Governance			
<input type="checkbox"/> No			
PR 05	Voluntary	Additional Assessed	PRI 1,3
PR 05.1	Indicate what type of ESG information your organisation typically considers during your property investment selection process.		
<input checked="" type="checkbox"/> Raw data from the target property asset/company <input type="checkbox"/> Appraisals/audits <input type="checkbox"/> Benchmarks/ratings against similar property asset			

- Country level data/benchmarks
- Data aligned with established property reporting standards, industry codes and certifications
- International initiatives, declarations or standards
- Data from engagements with stakeholders (e.g. tenants and local community surveys)
- Information from external advisers
- Other, specify
- We do not track this information

**PR 05.2** Provide a brief description of how this ESG information was incorporated into your investment selection process.

There have not been any new property purchases during the year. However, the policy aims to avoid buying property where the existing tenant is involved in activities which breach our negative criteria such as defence manufacturing. Working with our property manager we will also encourage more environmental and social data about potential buildings.

**PR 06** **Mandatory** **Core Assessed** **PRI 1**

**PR 06.1** Indicate if ESG issues impacted your property investment selection process during the reporting year.

- ESG issues helped identify risks and/or opportunities for value creation
- ESG issues led to the abandonment of potential investments
- ESG issues impacted the investment in terms of price offered and/or paid
- ESG issues impacted the terms in the shareholder/purchase agreements and/or lending covenants
- ESG issues were considered but did not have an impact on the investment selection process
- Other, specify
- Not applicable, our organisation did not select any investments in the reporting year
- We do not track this potential impact

**PR 06.2** Indicate how ESG issues impacted your property investment deal structuring processes during the reporting year.

- ESG issues impacted the investment in terms of price offered and/or paid
- ESG issues impacted the terms in the shareholder/purchase agreements and/or lending covenants
- ESG issues were considered but did not have an impact on the deal structuring process
- Other, specify
- Not applicable, our organisation did not select any investments in the reporting year
- We do not track this potential impact

**PR 07** **Mandatory** **Core Assessed** **PRI 4**

**PR 07.1** Indicate if your organisation includes ESG issues in your selection, appointment and/or monitoring of third-party property managers.

Yes

**PR 07.2** Indicate how your organisation includes ESG issues in your selection, appointment and/or monitoring of third party property managers.

- Selection process of property managers incorporated ESG issues
- Contractual requirements when appointing property managers includes ESG issues
- Monitoring of property managers covers ESG responsibilities and implementation

**Types of actions**

- Performance against quantitative and material environmental / resource targets over specified timeframe.
- Performance against quantitative and material environmental / resource targets against relevant benchmarks
- Performance against quantitative and qualitative targets to address social impacts of the portfolio/investment,
- Other, explain

As of 2018, our property manager shares data related to resource use and we have started discussions to improve performance.

**Coverage**

- >75% to 100%
- >50% to 75%
- <50%

No

**PR 07.3** Provide a brief description of your organisations selection, appointment and monitoring of third party property managers and how they contribute to the management of ESG issues for your property investments.

In 2018, Ecclesiastical Insurance Group approved a responsible property investment policy and this has led to more collaboration with the property manager. Since 2018, the property manager has shared environmental performance data of managed properties and we have started discussions on how to improve performance as it relates to energy use, water consumption and waste generation and recycling. We monitor performance of multi-let buildings on a quarterly basis.

PR 08	Mandatory	Gateway	PRI 2
PR 08.1	Indicate if your organisation, and/or property managers, considers ESG issues in post-investment activities relating to your property assets.		
	<input checked="" type="checkbox"/> Yes		
PR 08.2	Indicate whether your organisation, and/or property managers, considers ESG issues in the following post-investment activities relating to your property assets.		
	<input checked="" type="checkbox"/> We consider ESG issues in property monitoring and management <input checked="" type="checkbox"/> We consider ESG issues in property developments and major renovations. <input type="checkbox"/> We consider ESG issues in property occupier engagements <input type="checkbox"/> We consider ESG issues in community engagements related to our properties <input type="checkbox"/> We consider ESG issues in other post-investment activities, specify		
PR 08.3	Describe how your organisation, and/or property managers, considers ESG issues in post-investment activities related to your property assets.		
	<p>We have started to integrate ESG issues into the management of our Group property investments. For multi-let properties we now have environmental management and efficiency data. Where feasible we will also seek to invest further in efficiency through potential renewable projects applicable to properties in the portfolio, such as solar panel fit-outs.</p>		
	<input type="checkbox"/> No		
PR 09	Mandatory	Core Assessed	PRI 2,3
PR 09.1	Indicate the proportion of property assets for which your organisation, and/or property managers, set and monitored ESG targets (KPIs or similar) during the reporting year.		
	<input type="checkbox"/> >90% of property assets <input type="checkbox"/> 51-90% of property assets <input type="checkbox"/> 10-50% of property assets <input checked="" type="checkbox"/> <10% of property assets		
PR 09.2	Indicate which ESG targets your organisation and/or property managers typically set and monitor		
	<input type="checkbox"/> Environmental <input type="checkbox"/> Social <input type="checkbox"/> Governance <input checked="" type="checkbox"/> We do not set and/or monitor against targets		
PR 09.3	Additional information. [Optional]		
	<p>During 2017 we started gathering environmental data about our properties (EPC ratings). In 2018 we also collected additional environmental data for multi-let properties. We are discussing performance and encouraging improvements.</p> <p>We have installed solar panels, LED lighting and electric vehicle charging points at selective properties where the economic case was strong. Going forward we may seek to make this a more formal commitment and look for opportunities to improve a property's energy efficiency, for example. We will also explore with the agent the application of an appropriate 'landlord fit-out guide' to promote best practice in environmental sustainability to existing and future tenants.</p> <p>We have so far not set formal targets.</p>		
PR 10	Voluntary	Descriptive	PRI 2
PR 10.1	Indicate whether your property assets are assessed against certification schemes, ratings and/or benchmarks		
	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
PR 10.3	Indicate if your organisation uses property specific reporting standards to disclose information related to your property investments' ESG performance.		
	<input type="checkbox"/> Global Reporting Initiative (GRI) Construction & Real Estate Sector Supplement (CRESS) <input type="checkbox"/> Other property reporting standards, specify <input checked="" type="checkbox"/> No property specific reporting standards are used		
PR 11	Mandatory	Core Assessed	PRI 2
PR 11.1	Indicate the proportion of active property developments and major renovations where ESG issues have been considered.		
	<input type="checkbox"/> >90% of active developments and major renovations <input type="checkbox"/> 51-90% of active developments and major renovations <input type="checkbox"/> 10-50% of active developments and major renovations <input type="checkbox"/> <10% of active developments and major renovations <input checked="" type="checkbox"/> N/A, no developments and major renovations of property assets are active		

PR 11.2	Indicate if the following ESG considerations are typically implemented and monitored in your property developments and major renovations.
<input type="checkbox"/> Environmental site selection requirements <input type="checkbox"/> Environmental site development requirements <input checked="" type="checkbox"/> Sustainable construction materials <input type="checkbox"/> Water efficiency requirements <input checked="" type="checkbox"/> Energy efficiency requirements <input checked="" type="checkbox"/> Energy generation from on-site renewable sources <input checked="" type="checkbox"/> Waste management plans at sites <input checked="" type="checkbox"/> Health and safety management systems at sites <input type="checkbox"/> Health and wellbeing of residents <input type="checkbox"/> Construction contractors comply with sustainability guidelines <input type="checkbox"/> Resilient building design and orientation <input type="checkbox"/> Other, specify	

PR 11.3	Additional information. [Optional]
There were no new developments or major property renovations during the year.	

PR 15	Voluntary	Additional Assessed	PRI 1,2
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PR 15.1	Indicate whether your organisation measures how your approach to responsible investment in property investments has affected financial and/or ESG performance.
<input type="checkbox"/> We measure whether our approach to ESG issues impacts funds' financial performance <input type="checkbox"/> We measure whether our approach to ESG issues impacts funds' ESG performance <input checked="" type="checkbox"/> None of the above	

CM1 01	Mandatory	Additional Assessed	General
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CM1 01.1	Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:
<input type="checkbox"/> Third party assurance over selected responses from this year's PRI Transparency Report <input type="checkbox"/> Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year <input type="checkbox"/> Third party assurance or audit of the correct implementation of RI processes (that have been reported to the PRI this year) <input type="checkbox"/> Internal audit of the correct implementation of RI processes and/or accuracy of RI data (that have been reported to the PRI this year) <input checked="" type="checkbox"/> Internal verification of responses before submission to the PRI (e.g. by the CEO or the board) <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Whole PRI Transparency Report has been internally verified</li> <li><input type="checkbox"/> Selected data has been internally verified</li> </ul> <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above	

CM1 02	Mandatory	Descriptive	General
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CM1 02.1	We undertook third party assurance on last year's PRI Transparency Report
<input type="checkbox"/> Whole PRI Transparency Report was assured last year <input type="checkbox"/> Selected data was assured in last year's PRI Transparency Report <input checked="" type="checkbox"/> We did not assure last year's PRI Transparency report <input type="checkbox"/> None of the above, we were in our preparation year and did not report last year.	

CM1 03	Mandatory	Descriptive	General
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CM1 03.1	We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:
<input checked="" type="checkbox"/> We adhere to an RI certification or labelling scheme	
CM1 03.2	Which scheme?
<input checked="" type="checkbox"/> National SRI label based on the EUROSIF Transparency guidelines	
	% of total AUM the scheme applies
<input type="checkbox"/> < 25% <input checked="" type="checkbox"/> 25-50 % <input type="checkbox"/> 50-70 % <input type="checkbox"/> >75 %	
<input type="checkbox"/> B-corporation <input checked="" type="checkbox"/> UK Stewardship code	
	% of total AUM the scheme applies
<input type="checkbox"/> < 25% <input type="checkbox"/> 25-50 % <input type="checkbox"/> 50-70 % <input checked="" type="checkbox"/> >75 %	
<input type="checkbox"/> GRESB <input type="checkbox"/> Commodity type label (e.g. BCI) <input type="checkbox"/> Social label <input type="checkbox"/> Climate label <input type="checkbox"/> RIAA <input type="checkbox"/> Other	
<input type="checkbox"/> We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report <input type="checkbox"/> ESG audit of holdings <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above	

CM1 04	Mandatory	Descriptive	General
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CM1 04.1	Do you plan to conduct third party assurance of this year's PRI Transparency report?
<input type="checkbox"/> Whole PRI Transparency Report will be assured <input type="checkbox"/> Selected data will be assured <input checked="" type="checkbox"/> We do not plan to assure this year's PRI Transparency report	

CM1 07.1

Indicate who has reviewed/verified internally the whole - or selected data of the - PRI Transparency Report . and if this applies to selected data please specify what data was reviewed

- CEO or other Chief-Level staff
- The Board
- Investment Committee
- Compliance Function
- RI/ESG Team
- Investment Teams
- Legal Department
- Other (specify)