



RI TRANSPARENCY REPORT

2020

NEI Investments

About this report

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

This report is an export of the individual Signatory organisation's response to the PRI during the 2020 reporting cycle. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information. As a result, the reports can be extensive. However, to help easily locate information, there is a **Principles index** which highlights where the information can be found and summarises the indicators that signatories complete and disclose.

Understanding the Principles Index

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

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

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

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

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

Principles Index

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

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

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

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

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

NEI Investments

Reported Information

Public version

Organisational Overview

PRI disclaimer

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Basic information

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

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 checked="" type="radio"/> 10-50% <input type="radio"/> >50%
Fund of funds, manager of managers, sub-advised products	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50%
Other	<input checked="" type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
Total 100%	

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

- ☐ Hedge funds
- ☐ Fund of hedge funds

OO 01.2 Additional information. [Optional]

NEI is a provider of retail mutual funds. All security selection is conducted at the sub-advisor level, and these funds are used as building blocks for the multi-asset solutions. NEI conducts the strategic and tactical asset allocation for the multi-asset solutions.

OO 02	Mandatory	Public	Peering	General
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OO 02.1 Select the location of your organisation's headquarters.

Canada

OO 02.2

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

- ☒ 1
☐ 2-5
☐ 6-10
☐ >10

OO 02.3

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

FTE

63

OO 03**Mandatory****Public****Descriptive****General****OO 03.1**

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

- ☐ Yes
☒ No

OO 04**Mandatory****Public****Gateway/Peering****General****OO 04.1**

Indicate the year end date for your reporting year.

31/12/2019

OO 04.2

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

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

	trillions	billions	millions	thousands	hundreds
Total AUM		8	271	290	790
Currency	CAD				
Assets in USD		6	220	386	714

☐ Not applicable as we are in the fund-raising process

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

☒ Not applicable as we do not have any assets under execution and/or advisory approach

OO 06	Mandatory	Public	Descriptive	General
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OO 06.1	Select how you would like to disclose your asset class mix.
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- ☐ as percentage breakdown
☒ as broad ranges

	Internally managed (%)	Externally managed (%)
Listed equity	0	>50%
Fixed income	0	10-50%
Private equity	0	0
Property	0	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	0	0
Money market instruments	0	<10%
Other (1), specify	0	0
Other (2), specify	0	0

OO 06.2

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

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

Public

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.

Externally managed		SSA
	57	
		Corporate (financial)
	29	
		Corporate (non-financial)
	14	
		Securitised
	0	
		Total
	100%	

OO 09	Mandatory	Public	Peering	General
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OO 09.1	Indicate the breakdown of your organisation's AUM by market.
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	Developed Markets
96	
	Emerging Markets
04	
	Frontier Markets
0	
	Other Markets
0	
	Total 100%
100%	

Asset class implementation gateway indicators

OO 10	Mandatory	Public	Gateway	General
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OO 10.1	Select the active ownership activities your organisation implemented in the reporting year.
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	Listed equity – engagement
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- ☒ We engage with companies on ESG factors via our staff, collaborations or service providers.
- ☐ We require our external managers to engage with companies on ESG factors on our behalf.
- ☐ We do not engage directly and do not require external managers to engage with companies on ESG factors.

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

	Fixed income SSA – engagement
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- ☒ We engage with SSA bond issuers on ESG factors via our staff, collaborations or service providers.
- ☐ We require our external managers to engage with SSA bond issuers on ESG factors on our behalf.
- ☐ 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
--	---

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

	Fixed income Corporate (non-financial) – engagement
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- ☒ We engage with companies on ESG factors via our staff, collaborations or service providers.
- ☐ We require our external managers to engage with companies on ESG factors on our behalf.
- ☐ We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.

OO 11	Mandatory	Public	Gateway	General
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OO 11.2	Select the externally managed assets classes in which you and/or your investment consultants address ESG incorporation in your external manager selection, appointment and/or monitoring processes.
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Asset class	ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes
Listed equity	<div> <div></div> <div>Listed equity - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</div> </div> <div> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation </div>
Fixed income - SSA	<div> <div></div> <div>Fixed income - SSA - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</div> </div> <div> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation </div>
Fixed income - corporate (financial)	<div> <div></div> <div>Fixed income - corporate (financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</div> </div> <div> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation </div>
Fixed income - corporate (non-financial)	<div> <div></div> <div>Fixed income - corporate (non-financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</div> </div> <div> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation </div>
Money market instruments	<div> <div></div> <div>Money market instruments - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</div> </div> <div> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation </div>

OO 11.4

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

In the manager selection and appointment process NEI evaluates ESG integration in the investment process, as well the firm's overall ESG capabilities. This is done through the RFP process and an on-site due diligence meeting. Examples of how firms' ESG capabilities are assessed include number of ESG professionals, proxy voting/engagement policy, ESG fit and potential to collaborate on ESG engagements. A full quantitative and qualitative ESG assessment is completed and maintained for each external manager. This assessment is updated annually during the normal monitoring process. NEI also sends out ESG surveys that evaluate each firm's commitment to adopting emerging ESG practices.

OO 12**Mandatory****Public****Gateway****General****OO 12.1**

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

Core modules

- ☒ Organisational Overview
- ☒ Strategy and Governance

RI implementation directly or via service providers**Direct - Listed Equity active ownership**

- ☒ Engagements
- ☒ (Proxy) voting

RI implementation via external managers**Indirect - Selection, Appointment and Monitoring of External Managers**

- ☒ Listed Equities
- ☒ Fixed income - SSA
- ☒ Fixed income - Corporate (financial)
- ☒ Fixed income - Corporate (non-financial)

Closing module

- ☒ Closing module

NEI Investments

Reported Information

Public version

Strategy and Governance

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Investment policy

SG 01

Mandatory

Public

Core Assessed

General

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

SG 01.1

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

☒ Yes

SG 01.2

Indicate the components/types and coverage of your policy.

Select all that apply

Policy components/types	Coverage by AUM
<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="checkbox"/> Asset class-specific RI guidelines <input checked="" type="checkbox"/> Sector specific RI guidelines <input checked="" type="checkbox"/> Screening / exclusions policy <input checked="" type="checkbox"/> Engagement policy <input checked="" type="checkbox"/> (Proxy) voting policy <input type="checkbox"/> Other, specify (1) <input type="checkbox"/> Other, specify(2)	<input checked="" type="radio"/> Applicable policies cover all AUM <input type="radio"/> Applicable policies cover a majority of AUM <input type="radio"/> Applicable policies cover a minority of AUM

SG 01.3

Indicate if the investment policy covers any of the following

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

	Other description (1)
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Public policy approach. Public policy includes engaging with regulators, governments as well as standards setters.

☐ 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.
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Our ESG Investing Program is based on the thesis that companies integrating best environmental, social and governance (ESG) practices into their strategies and operations will build long-term sustainable value for all stakeholders and provide higher risk-adjusted returns to shareholders. The program incorporates the following elements:

- Evaluation of sectors and companies for material ESG risks.
- Corporate engagement on ESG issues with companies in our funds.
- Proxy voting based on ESG guidelines.
- Public policy and standards work to mitigate systemic ESG risks.
- Research on emerging ESG issues.

☐ No

SG 02	Mandatory	Public	Core Assessed	PRI 6
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New selection options have been added to this indicator. Please review your prefilled responses carefully.

SG 02.1	Indicate which of your investment policy documents (if any) are publicly available. Provide a URL and an attachment of the document.
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☒ Policy setting out your overall approach

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

☒ URL

	URL
--	-----

<https://www.neiinvestments.com/documents/Marketing/RI%20Policy.pdf>

☒ Attachment (will be made public)

	Attachment
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[File 1:RI Policy.pdf](#)

- ☐ Formalised guidelines on environmental factors
- ☐ Formalised guidelines on social factors
- ☐ Formalised guidelines on corporate governance factors
- ☐ Sector specific RI guidelines
- ☒ Screening / exclusions policy

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

- ☒ URL

	URL
--	-----

<https://www.neiinvestments.com/documents/Marketing/RI%20Policy.pdf>

- ☒ Attachment (will be made public)

	Attachment
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[File 1:RI Policy.pdf](#)

- ☒ Engagement policy

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

- ☒ URL

	URL
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<https://www.neiinvestments.com/pages/responsible-investing/esg-difference/focus-list/>

- ☒ Attachment (will be made public)

	Attachment
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[File 1:RI Policy.pdf](#)

- ☒ (Proxy) voting policy

	URL/Attachment
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- ☒ URL

URL

https://www.neiinvestments.com/documents/ESG/NEI_Proxy_Voting_Guidelines_2020Feb_EN.pdf

☒ Attachment (will be made public)

Attachment

[File 1:NEI_Proxy_Voting_Guidelines_2020Feb_EN.pdf](#)

☐ We do not publicly disclose our investment policy documents

SG 02.2	Indicate if any of your investment policy components are publicly available. Provide URL and an attachment of the document.
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☒ Your organisation's definition of ESG and/or responsible investment and it's relation to investments

URL/Attachment

☒ URL

URL

<https://www.neiinvestments.com/documents/Marketing/RI%20Policy.pdf>

☐ Attachment

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

URL/Attachment

☒ URL

URL

<https://www.neiinvestments.com/documents/Marketing/RI%20Policy.pdf>

☐ Attachment

☒ Governance structure of organisational ESG responsibilities

URL/Attachment

☒ URL

	URL
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<https://www.neiinvestments.com/documents/Marketing/RI%20Policy.pdf>

☐ Attachment

☒ ESG incorporation approaches

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

☒ URL

	URL
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<https://www.neiinvestments.com/documents/Marketing/RI%20Policy.pdf>

☐ Attachment

☒ Active ownership approaches

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

☒ URL

	URL
--	-----

<https://www.neiinvestments.com/documents/Marketing/RI%20Policy.pdf>

☐ Attachment

☒ Reporting

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

☒ URL

	URL
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<https://www.neiinvestments.com/documents/Marketing/RI%20Policy.pdf>

☐ Attachment

☒ Other RI considerations, specify (1)

	Other description (1)
--	-----------------------

Public policy approach. Public policy includes engaging with regulators, governments as well as standards setters.

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

☒ URL

	URL
--	-----

<https://www.neiinvestments.com/documents/Marketing/RI%20Policy.pdf>

☐ Attachment

☐ We do not publicly disclose any investment policy components

SG 03	Mandatory	Public	Core Assessed	General
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SG 03.1	Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.
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☒ Yes

SG 03.2	Describe your policy on managing potential conflicts of interest in the investment process.
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Our conflicts of interest policy describes situations in which a conflict of interest may exist and sets out procedures and requirements related to, among other things, disclosure, prohibited activities, resolution of conflicts of interest and consequences of unresolved conflicts. As well, members of the asset management team that are considered "access persons" (which includes all of the ESG team) must register their personal investments in individual equities with the compliance team and must run all new purchases through compliance before making them.

☐ No

SG 04	Voluntary	Public	Descriptive	General
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SG 04.1	Indicate if your organisation has a process for identifying and managing incidents that occur within investee entities.
---------	---

☒ Yes

☐ No

SG 04.2	Describe your process on managing incidents
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NEI has a comprehensive process for monitoring portfolio companies. All portfolio companies are monitored for Headline Risk through news and ESG controversies services. As part of this process, the NEI ESG Services Team identifies, evaluates and monitors stories that are published in credible media sources and portray a company in a negative manner. Observed Headline Risks are categorized for type and severity, and required actions are determined.

In cases where an incident identified falls outside the range of issues normally captured by a company evaluation and is not being addressed by our Corporate Engagement Program, a Management Breach Investigation may be conducted. We define a Management Breach as a significant transgression of management ethics or a situation indicating a corporate culture that is inconsistent with our responsible investment thesis. While a Headline Risk report records and assesses controversial or negative media coverage about a company, the Management Breach process examines the fundamentals of an incident to determine if a company has violated our Baseline Expectations. A Management Breach determination results in one of three potential outcomes: enhanced monitoring, engagement or divestment.

In addition, we have developed and implemented an internal due diligence process to ensure that our investment processes comply with the OECD's guidance on *Responsible Business Conduct for Institutional Investors*, which outlines the expectations for investors in regard to undertaking proper due diligence related to the OECD Guidelines for Multinational Enterprises. This process applies to all screened and non-screened portfolios. A particular concern for us is to ensure that none of our portfolio companies are engaging in any activities that cause or contribute to negative human rights impacts.

Objectives and strategies

SG 05	Mandatory	Public	Gateway/Core Assessed	General
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SG 05.1

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

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

SG 05.2

Additional information. [Optional]

Every year we assess the progress and outcomes from the previous year's engagement as an input to setting the next year's strategy. All current engagement dialogues are reviewed in the last quarter of the year. We review key sector and issue developments, consider any significant changes in our portfolio holdings, in order to determine if we need to develop any new themes or engagement focus areas. We announce dialogue with around 30 selected companies early in the new year in our Focus List launch and this acts as the core focus of our engagement program. We ultimately engage many more companies in the portfolio and may launch additional tactical dialogues during the year in response to emerging risks and opportunities. We provide quarterly and annual reporting on progress.

Our proxy voting guidelines are reviewed annually and a determination is made whether to publish amendments or undertake a full update.

In addition, our RI Policy is reviewed on an annual basis and revised if necessary.

Governance and human resources

SG 07	Mandatory	Public	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

- ☒ Board members or trustees
 - ☐ Oversight/accountability for responsible investment
 - ☐ Implementation of responsible investment
 - ☒ No oversight/accountability or implementation responsibility for responsible investment
- ☒ Internal Roles (triggers other options)

Select from the below internal roles

- ☒ Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee
 - ☒ Oversight/accountability for responsible investment
 - ☒ Implementation of responsible investment
 - ☐ No oversight/accountability or implementation responsibility for responsible investment
- ☒ Other Chief-level staff or head of department, specify
 - VP ESG Services**
 - ☒ Oversight/accountability for responsible investment
 - ☒ Implementation of responsible investment
 - ☐ No oversight/accountability or implementation responsibility for responsible investment
 - ☐ Portfolio managers
 - ☐ Investment analysts
 - ☒ 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 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.

The Chief Investment Officer is responsible for overseeing the development (in coordination with Product) of new RI-themed investment products, for hiring and monitoring sub-advisors with ESG capabilities, and for working with the ESG team to further integrate ESG into our investment process.

NEI's ESG Services Department operates through four program areas: evaluation, engagement, public policy and research. Within each, we have defined roles and responsibilities related to oversight and implementation of our RI program. In addition, we regularly conduct strategic planning to ensure that we are fulfilling our RI mandate and maintaining our leadership position in the RI industry. This strategic planning process includes the Chief Investment Officer and the portfolio management team.

SG 07.3

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

Number

7

SG 07.4

Additional information. [Optional]

Note that we have embraced RI as a key differentiator and as such, our sales team is trained in talking to advisors about RI and why advisors should integrate RI into their practice.

Promoting responsible investment**SG 09****Mandatory****Public****Core Assessed****PRI 4,5****SG 09.1**

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

Select all that apply

☒ Principles for Responsible Investment

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

- ☐ Basic
- ☐ Moderate
- ☒ Advanced

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

We participated as a steering committee member and/or lead investor in several PRI collaborations:

- Responsible Tax
- Methane
- Climate Change Transition for Oil& Gas

- ☐ 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)

- ☐ Basic
- ☐ Moderate
- ☒ Advanced

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

We were signatory to the CDP Climate disclosure request.

In October 2019, we co-organized with CDP an all-day event in Calgary for energy companies focused on improving carbon-related disclosure. Companies and investors attended the session to discuss challenges and gaps as they relate to carbon disclosure in the oil & gas sector, as well as outlining the investor need for better information. This was the third year running we have held the event in collaboration with the CDP. Roughly 20 energy companies attended the event.

☒ CDP Forests

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

- ☒ Basic
- ☐ Moderate
- ☐ Advanced

☒ CDP Water

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

- ☒ Basic
- ☐ Moderate
- ☐ Advanced

☐ CFA Institute Centre for Financial Market Integrity

☒ Climate Action 100+

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

- ☐ Basic
- ☐ Moderate
- ☒ Advanced

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

We are co-leads for three dialogues in CA100+ and a supporting investor in seven other dialogues.

- ☐ 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)
- ☒ Interfaith Center on Corporate Responsibility (ICCR)

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

- ☐ Basic
- ☐ Moderate
- ☒ Advanced

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

As an Associate Member of ICCR, we sat on several steering committees/leadership groups and led, co-led or participated in a variety of collaborative engagements, including:

- Investor Alliance for Human Rights (IAHR) Steering Committee
- IAHR Financials Leadership Group
- IAHR ICT Sector Leadership Group
- Digital Rights (co-lead for global investor statement)
- ICCR Health Equity Leadership Team
- Access to Medicine
- Bangladesh Investor Initiative (lead for Canadian Tire)
- ICCR Financials Working Group (steering group for Wells Fargo)
- Access to Nutrition
- Methane

- ☒ International Corporate Governance Network (ICGN)

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

- ☐ Basic
☒ Moderate
☐ Advanced

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

We continue to be a member of ICGN and in 2019 participated in the member consultation on the Global Stewardship Principles

- ☐ Investor Group on Climate Change, Australia/New Zealand (IGCC)
☐ International Integrated Reporting Council (IIRC)
☒ Investor Network on Climate Risk (INCR)/CERES

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

- ☐ Basic
☐ Moderate
☒ Advanced

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

We played an active role within Ceres working groups. Through Ceres, we participate as a lead investor in the Climate Action 100+ initiative supporting the adoption of the disclosure recommendations of the FSB Taskforce on Climate-related Financial Disclosure.

- ☐ 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
Responsible Investment Association (Canada)

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

- ☐ Basic
☐ Moderate
☒ Advanced

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

We are a Sustaining Member of the RIA and we sit on the Board. As well, we chaired the RIA policy stewardship group and the Toronto RI Working Group

- ☐ 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

Business Benchmark for Farm Animal Welfare

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

- ☐ Basic
- ☒ Moderate
- ☐ Advanced

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

We are a signatory to the BBFAW investor statement, have led engagements on the initiative in the past, and continue to look for ways to support the initiative.

- ☒ Other collaborative organisation/initiative, specify

Investors for Opioid Accountability

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

- ☐ Basic
- ☐ Moderate
- ☒ Advanced

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

We chaired the International Sub-Committee of the Investors for Opioid Accountability (IOA) focusing on prescription opioid risks beyond the U.S. market. We participated in engagements with U.S. companies, leading part of the agenda in dialogue and responded to the media in Canada as a member of IOA.

- ☒ Other collaborative organisation/initiative, specify

Canadian Coalition for Good Governance

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

- ☐ Basic
☐ Moderate
☒ Advanced

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

Our Director of Corporate Engagement sat on the CCGG Environmental and Social Committee.

☒ Other collaborative organisation/initiative, specify

Energy Futures Lab

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

- ☐ Basic
☐ Moderate
☒ Advanced

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

Our Director, Corporate Engagement is a fellow of the Energy Futures Lab - a collaboration among companies, civil society, government, academics, First Nations and others on a shared vision for a net-zero energy future for Alberta.

SG 09.2	Mandatory to Report Voluntary to Disclose	Public	Descriptive	PRI 1
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	Indicate approximately what percentage (+/- 5%) of your externally managed assets under management are managed by PRI signatories.
--	--

	%
--	---

65

SG 10	Mandatory	Public	Core Assessed	PRI 4
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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

In 2019, NEI engaged numerous times with Canadian financial advisors to provide educational support on Responsible Investing, including one-on-one meetings, branch presentations, conference seminars and webinars. Over the course of the year, thousands of financial advisors and investors are exposed to educational and/or promotional RI materials through NEI. Examples of training and/or educational seminars include:

- Responsible Investing basics – What is it? Why it matters? What is corporate engagement? How it makes a difference for communities, companies and shareholders.
- Responsible Investing Webinars – Targeted to financial advisors, especially those in Credit Unions, to help them identify how RI can be incorporated into investor portfolios.
- Hosted RIA panel for advisors on how to incorporate RI into your practice

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

To set a standard for engagement transparency in Canada, we publish quarterly updates on our corporate engagement activities on our website: <https://www.neiinvestments.com/pages/about-nei/about-ethical-funds/esg-difference/corporate-engagements/>

We also maintain a database providing access to the detailed rationales for our proxy voting decisions: <http://vds.issproxy.com/SearchPage.php?CustomerID=8272>

Encouraged the development of an RI certification program through the RIA.

We annually provide input on the PRI's reporting framework.

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

NEI representatives spoke at numerous events, including the conferences of RIA Canada, Ceres, ICCR, Conference Board of Canada, as well as at numerous events to introduce Canadian financial advisors to promote responsible investment.

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 published a paper on emerging standards for responsible investment

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 numerous consultations by non-governmental organizations, including OECD, ICGN and the Equator Principles. Our submissions are published on our website <https://www.neiinvestments.com/pages/about-nei/about-ethical-funds/esg-difference/public-policy-and-standards/>

Frequency of contribution

- ☒ Quarterly or more frequently
 - ☐ Biannually
 - ☐ Annually
 - ☐ Less frequently than annually
 - ☐ Ad hoc
 - ☐ Other
- ☐ Wrote and published articles on responsible investment in the media
- ☒ A member of PRI advisory committees/ working groups, specify

Description

Responsible Tax, Climate Change Transition for Oil & Gas, Methane, Labour Standards in the Agricultural Supply Chain

Frequency of contribution

- ☒ Quarterly or more frequently
 - ☐ Biannually
 - ☐ Annually
 - ☐ Less frequently than annually
 - ☐ Ad hoc
 - ☐ Other
- ☒ On the Board of, or officially advising, other RI organisations (e.g. local SIFs)

Description

RIA, CCGG, IAHR, Toronto RI Working Group

Frequency of contribution

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

SG 11	Voluntary	Public	Additional Assessed	PRI 4,5,6
-------	-----------	--------	---------------------	-----------

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 markers
- ☒ 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

provide URL

<https://www.neiinvestments.com/pages/responsible-investing/esg-difference/public-policy-and-standards/>

☐ No

☐ No

SG 11.4

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

Our public policy activities are disclosed in our quarterly and annual engagement reports:

<https://www.neiinvestments.com/pages/responsible-investing/esg-difference/focus-list/>

Our public policy submissions are disclosed on our website: <https://www.neiinvestments.com/pages/responsible-investing/esg-difference/public-policy-and-standards/>

Key topics for public policy engagement in 2019 included:

- Climate change and the energy transition
- Vehicle emission standards
- methane emission standards
- Board diversity requirements
- Human rights and labour rights
- Indigenous Rights
- Responsible lending

Outsourcing to fiduciary managers and investment consultants

SG 12	Mandatory	Public	Core Assessed	PRI 4
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New selection options have been added to this indicator. Please review your prefilled responses carefully.

SG 12.1	Indicate whether your organisation uses investment consultants.
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- ☐ Yes, we use investment consultants
- ☒ No, we do not use investment consultants.

ESG issues in asset allocation

SG 13	Mandatory	Public	Descriptive	PRI 1
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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 14	Mandatory to Report Voluntary to Disclose	Public	Additional Assessed	PRI 1
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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

	Specify the AUM invested in low carbon and climate resilient portfolios, funds, strategies or asset classes.
--	--

	trillions	billions	millions	thousands	hundreds
Total AUM			486	956	935
Currency	CAD				
Assets in USD			366	213	754

Specify the framework or taxonomy used.

NEI Environmental Leaders Fund is a global equity solution that seeks to address the population, consumption and demand dynamics that pressure finite resources through resource optimization. The environmental markets of water, energy, waste and food & agriculture are the principal areas for investment.

Resource optimization is a leading response to the pressures and demands being put on limited resources. It seeks to extend the shelf life of resources beyond their conventional output and pivot to a more optimal and efficient framework that sustains global growth demands. The global risks of growing populations, urbanization, water scarcity and climate change also represent potential long-term drivers for investment. As a result, a new thematic investment opportunity set has emerged, capitalizing on companies seeking to address sustainability challenges in the areas of water, energy, waste and food & agriculture-known as environmental markets.

- ☐ 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
--	-------------------

Engaged high-emitting companies in our portfolio on setting emission reduction targets and aligning with a net-zero future

☐ 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.
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We use third party tools to provide carbon footprint information to clients that request it. To date we have used Bloomberg and ISS to provide that data.

SG 15	Mandatory to Report Voluntary to Disclose	Public	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.
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☒ Yes

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

	%
--	---

6.1

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

	Asset class invested
--	----------------------

☒ Listed equity

	Percentage of AUM (+/-5%) per asset class invested in the area
--	--

3.5

- ☐ Fixed income - SSA
- ☐ Fixed income - Corporate (financial)
- ☐ Fixed income - Corporate (non-financial)
- ☐ Fixed income - Securitised

Brief description and measures of investment
--

The NEI Environmental Leaders Fund seeks to achieve long-term capital growth while addressing the environmental challenges of our times through a resource optimization approach. The fund focuses on companies that are growing sustainability leaders in the areas of water, energy, waste and food & agriculture.

☒ Renewable energy

Asset class invested

☒ Listed equity

Percentage of AUM (+/-5%) per asset class invested in the area
--

0.5

- ☐ Fixed income - SSA
- ☐ Fixed income - Corporate (financial)
- ☐ Fixed income - Corporate (non-financial)
- ☐ Fixed income - Securitised

Brief description and measures of investment
--

The NEI Environmental Leaders Fund seeks to achieve long-term capital growth while addressing the environmental challenges of our times through a resource optimization approach. The fund focuses on companies that are growing sustainability leaders in the areas of water, energy, waste and food & agriculture.

☒ Green buildings

Asset class invested

☒ Listed equity

Percentage of AUM (+/-5%) per asset class invested in the area
--

.5

- ☐ Fixed income - SSA
- ☐ Fixed income - Corporate (financial)
- ☐ Fixed income - Corporate (non-financial)
- ☐ Fixed income - Securitised

Brief description and measures of investment

The NEI Environmental Leaders Fund seeks to achieve long-term capital growth while addressing the environmental challenges of our times through a resource optimization approach. The fund focuses on companies that are growing sustainability leaders in the areas of water, energy, waste and food & agriculture.

- ☐ Sustainable forestry
- ☒ Sustainable agriculture

Asset class invested

- ☒ Listed equity

Percentage of AUM (+/-5%) per asset class invested in the area

.5

- ☐ Fixed income - SSA
- ☐ Fixed income - Corporate (financial)
- ☐ Fixed income - Corporate (non-financial)
- ☐ Fixed income - Securitised

Brief description and measures of investment

The NEI Environmental Leaders Fund seeks to achieve long-term capital growth while addressing the environmental challenges of our times through a resource optimization approach. The fund focuses on companies that are growing sustainability leaders in the areas of water, energy, waste and food & agriculture.

- ☐ Microfinance
- ☐ SME financing
- ☐ Social enterprise / community investing
- ☐ Affordable housing
- ☐ Education
- ☐ Global health
- ☒ Water

Asset class invested

- ☒ Listed equity

Percentage of AUM (+/-5%) per asset class invested in the area

1.1

- ☐ Fixed income - SSA
- ☐ Fixed income - Corporate (financial)
- ☐ Fixed income - Corporate (non-financial)
- ☐ Fixed income - Securitised

Brief description and measures of investment

The NEI Environmental Leaders Fund seeks to achieve long-term capital growth while addressing the environmental challenges of our times through a resource optimization approach. The fund focuses on companies that are growing sustainability leaders in the areas of water, energy, waste and food & agriculture.

☐ Other area, specify

☐ No

Innovation

SG 18	Voluntary	Public	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 have developed and implemented an internal due diligence process to align our existing approach to the OECD's guidance on "Responsible Business Conduct for Institutional Investors," which outlines the expectations for investors in regard to undertaking proper due diligence related to the OECD Guidelines for Multinational Enterprises.

Our internal engagement database allows us to track engagement with every company by topic, and to track progress in terms of our effort, the company's responsiveness and the outcome achieved.

We have been the catalyst for numerous multi-stakeholder processes that seek to find collaborative solutions to challenging, systemic issues. For example, in 2019 we organized a full-day workshop on the opportunities and risks of the energy transition for Canadian companies. In organizing the event, we formed a steering committee that included Suncor Energy, Royal Bank of Canada, Teck Resources and Energy Futures Lab. the very act of organizing the event was an innovative form of engagement, and the event itself was attended by close to 100 investors, academics, companies and others.

We provide a very high level of transparency on our engagement activities, including detailed disclosure of dialogue activities, publication of policy submissions, and full disclosure of vote decisions and rationales. We believe we have demonstrated over two decades that there is no insurmountable barrier to transparency on engagement

☐ No

Communication

SG 19	Mandatory	Public	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.

Selection, Appointment and Monitoring**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

Disclosure to clients/beneficiaries**Disclosure to clients/beneficiaries**

- ☒ How responsible investment considerations are included in manager selection, appointment and monitoring processes
- ☒ Details of the responsible investment activities carried out by managers on your behalf
- ☒ E, S and/or G impacts and outcomes that have resulted from your managers' investments and/or active ownership
- ☐ Other

Frequency

- ☐ Quarterly or more frequently
- ☐ Biannually
- ☒ Annually
- ☐ Less frequently than annually
- ☐ Ad-hoc/when requested

Listed equity - Engagement**Do you disclose?**

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

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	
	<div>Disclosure to public and URL</div> <p> <input checked="" type="radio"/> Disclose all voting decisions <input type="radio"/> Disclose some voting decisions <input type="radio"/> Only disclose abstentions and votes against management </p>
	<div>Frequency</div> <p> <input checked="" type="checkbox"/> Quarterly or more frequently <input type="checkbox"/> Biannually <input type="checkbox"/> Annually <input type="checkbox"/> Less frequently than annually <input type="checkbox"/> Ad hoc/when requested </p>
	<div>URL</div> <p> https://www.neiinvestments.com/pages/responsible-investing/esg-difference/proxy-voting/ </p>

SG 19.2	Additional information [Optional]
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Our proxy voting decisions and rationales are disclosed in a searchable public database.

NEI Investments

Reported Information

Public version

Indirect – Manager Selection, Appointment and Monitoring

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.

Listed Equity and Fixed Income Strategies

SAM 01	Mandatory	Public	Gateway	PRI 1
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SAM 01.1

Indicate which of the following ESG incorporation strategies you require your external manager(s) to implement on your behalf for all your listed equity and/or fixed income assets:

Active investment strategies

Active investment strategies	Listed Equity	FI - SSA	FI - Corporate (financial)	FI - Corporate (non-financial)
Screening	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Thematic	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Integration	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Selection

SAM 02	Mandatory	Public	Core Assessed	PRI 1
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SAM 02.1

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

	LE	FI - SSA	FI - Corporate (financial)	FI - Corporate (non-financial)				
Your organisation's investment strategy and how ESG objectives relate to it	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
ESG incorporation requirements	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
ESG reporting requirements	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
Other	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
No RI information covered in the selection documentation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

You selected an 'Other' option in table SAM 02.1 above, please specify

- Engagement commitments and activities
- Gender Diversity at the firm level

SAM 02.2

Explain how your organisation evaluates the investment manager's ability to align between your investment strategy and their investment approach

Strategy

	LE	FI - SSA	FI - Corporate (financial)	FI - Corporate (non-financial)				
Assess the time horizon of the investment manager's offering vs. your/beneficiaries' requirements	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
Assess the quality of investment policy and its reference to ESG	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
Assess the investment approach and how ESG objectives are implemented in the investment process	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
Review the manager's firm-level vs. product-level approach to RI	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
Assess the ESG definitions to be used	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

ESG people/oversight

	LE	FI - SSA	FI - Corporate (financial)	FI - Corporate (non-financial)				
Assess ESG expertise of investment teams	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
Review the oversight and responsibilities of ESG implementation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
Review how is ESG implementation enforced /ensured	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
Review the manager's RI-promotion efforts and engagement with the industry	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

Process/portfolio construction/investment valuation

	LE	FI - SSA	FI - Corporate (financial)	FI - Corporate (non-financial)				
Review the process for ensuring the quality of the ESG data used	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
Review and agree the use of ESG data in the investment decision making process	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
Review and agree the impact of ESG analysis on investment decisions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
Review and agree ESG objectives (e.g. risk reduction, return seeking, real-world impact)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
Review and agree manager's ESG risk framework	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
Review and agree ESG risk limits at the portfolio level (portfolio construction) and other ESG objectives	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
Review how ESG materiality is evaluated by the manager	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
Review process for defining and communicating on ESG incidents	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
Review and agree ESG reporting frequency and detail	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
Other, specify	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

If you select any `Other` option(s), specify

In addition to the above, NEI reviews each external manager's process for using results of ESG engagements, conducted either by the manager or by NEI, in the portfolio ESG evaluation. ESG engagements can provide insight into portfolio positions and therefore overall portfolio risk.

SAM 02.3

Indicate the selection process and its ESG/RI components

- ☒ Review ESG/RI responses to RfP, RfI, DDQ etc.
- ☐ Review responses to PRI's Limited Partners' Responsible Investment Due Diligence Questionnaire (LP DDQ)
- ☒ Review publicly available information on ESG/RI
- ☒ Review assurance process on ESG/RI data and processes
- ☒ Review PRI Transparency Reports
- ☐ Request and discuss PRI Assessment Reports
- ☒ Meetings with the potential shortlisted managers covering ESG/RI themes
- ☒ Site visits to potential managers offices
- ☒ Other, specify

Review the joint engagements that the manager is either leading or participating in. Utilize NEI relationships in the RI community to determine the breadth and depth of the manager's joint engagement capabilities.

SAM 02.4

When selecting external managers does your organisation set any of the following:

	LE	FI - SSA	FI - Corporate (financial)	FI - Corporate (non-financial)				
ESG performance development targets	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
ESG score	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
ESG weight	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
Real world economy targets	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
Other RI considerations	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

You selected an 'Other' option in table SAM 02.4 above, please specify

ESG engagement commitments

SAM 02.5

Describe how the ESG information reviewed and discussed affects the selection decision making process.[OPTIONAL]

Whether we are hiring managers for screened or un-screened mandates, we look for managers who consider environmental, social and corporate governance (ESG) factors in their approach to stock selection, risk management and/or asset allocation. This approach is at the foundation of our portfolio manager selection and monitoring process and we communicate it clearly to manager candidates at the outset of the selection process. After initial communications and data collection phase, we review each candidate's ESG philosophy, strategy, people, and process information that has been collected through DDQs, external third-party assurances, public information and multiple in-person meetings. Based on our quantitative method and qualitative overview, we score the following ESG metrics, from 1 -5:

- ESG Integration: Quantitative Process and Transparency
- Engagement: Selecting engagement targets, reporting, and openness to joint engagements
- Thought Leadership: quality
- Impact: stock selection and impact reporting

These scores are then weighted and added up to reveal a manager selection score - ESG. That score along with a qualitative description of each manager candidate is then incorporated into the overall manager selection score. At NEI, we have a strategic initiative when replacing managers to elevate the ESG profile of the mandate, thereby requiring the new manager to have a higher ESG score than the manager that is being replaced.

Appointment				
SAM 04	Mandatory	Public	Core Assessed	PRI 1
SAM 04.1	Indicate if in the majority of cases and where the structure of the product allows, your organisation does any of the following as part of the manager appointment and/or commitment process			
<input checked="" type="checkbox"/> Sets standard benchmarks or ESG benchmarks <input checked="" type="checkbox"/> Defines ESG objectives and/ or ESG related exclusions/restrictions <input checked="" type="checkbox"/> Sets incentives and controls linked to the ESG objectives <input checked="" type="checkbox"/> Requires reporting on ESG objectives <input checked="" type="checkbox"/> Requires the investment manager to adhere to ESG guidelines, regulations, principles or standards <input checked="" type="checkbox"/> Other, specify (1)				
<div>specify</div> <p>Requires reporting on ESG enagements</p>				
<input type="checkbox"/> Other, specify (2) <input type="checkbox"/> None of the above				
SAM 04.2	Provide an example per asset class of your benchmarks, objectives, incentives/controls and reporting requirements that would typically be included in your managers' appointment.			
<div>Asset class</div>				
<input checked="" type="checkbox"/> Listed equity (LE)				
<div>Benchmark</div>				
<input checked="" type="checkbox"/> Standard benchmark <input checked="" type="checkbox"/> ESG benchmark, specify <p>Jantzi Social Index</p>				
<div>ESG Objectives</div>				
<input checked="" type="checkbox"/> ESG related strategy, specify <p>All managers under the RS Funds umbrella are required to comply with the NEI Responsible Investment Policy</p>				

☒ ESG related investment restrictions, specify

NEI retains the right to impose investment restrictions on external managers. This includes screening companies with primary business activities in tobacco, gambling, adult entertainment, military weapons and nuclear material.

☒ ESG integration, specify

NEI retains the rights to assess the ESG performance of investment process before initial purchase. After initial purchase the NEI ESG team monitors the company to ensure that it continues to meet our ESG expectations.

☒ Engagement, specify

NEI retains the right to engage directly with any of the portfolio companies. We assess the willingness and capacity to collaborate of potential managers in the selection and appointment process.

☒ Voting, specify

NEI retains rights of all corporate actions and voting issues in accordance with NEI's proxy voting guidelines.

☒ Promoting responsible investment

As a strategic initiative, all managers that are replaced must be done so by a manager that has a better ESG profile than the manager that is being replaced.

☐ ESG specific improvements

☐ Other, specify

☒ ESG guidelines/regulation, principles/standards, specify

Adherence to NEI RI policy.

Incentives and controls

☐ Fee based incentive

☒ Communication and remedy of breaches

☒ Termination

☒ No fee/ breach of contract

Reporting requirements

☒ Monthly

☐ Quarterly

☐ Bi-annually

☐ Annually

☐ Ad-hoc/when requested

☒ Fixed income - SSA (SSA)

Benchmark

☒ Standard benchmark, specify

Multiple benchmarks used.

☐ ESG benchmark, specify

ESG Objectives

☒ ESG related strategy, specify

All managers under the RS Funds umbrella are required to comply with the NEI Responsible Investment Policy

☒ ESG related investment restrictions, specify

NEI retains the right to impose investment restrictions on external managers. This includes screening companies with primary business activities in tobacco, gambling, adult entertainment, military weapons and nuclear material.

☒ ESG integration, specify

NEI retains the rights to assess the ESG performance of investment process before initial purchase. After initial purchase the NEI ESG team monitors the company to ensure that it continues to meet our ESG expectations.

☒ Engagement, specify

NEI retains the right to engage directly with any of the portfolio companies. We assess the willingness and capacity to collaborate of potential managers in the selection and appointment process.

☒ Voting, specify

NEI retains rights of all corporate actions and voting issues in accordance with NEI's proxy voting guidelines.

☒ Promoting responsible investment

As a strategic initiative, all managers that are replaced must be done so by a manager that has a better ESG profile than the manager that is being replaced.

☐ ESG specific improvements

☐ Other, specify

☒ ESG guidelines/regulation, principles/standards, specify

Adherence to NEI RI policy.

Incentives and controls

☐ Fee based incentive

☒ Communication and remedy of breaches

☐ Termination

☐ No fee/ breach of contract

Reporting requirements

☐ Ad-hoc/when requested

☐ Annually

☐ Bi-annually

☐ Quarterly

☒ Monthly

☒ Fixed income - Corporate (financial)

Benchmark

☒ Standard benchmark, specify

Multiple benchmarks used.

☐ ESG benchmark, specify

ESG Objectives

☐ Other, specify

☒ ESG related strategy, specify

All managers under the RS Funds umbrella are required to comply with the NEI Responsible Investment Policy

☒ ESG related investment restrictions, specify

NEI retains the right to impose investment restrictions on external managers. This includes screening companies with primary business activities in tobacco, gambling, adult entertainment, military weapons and nuclear material.

☒ ESG integration, specify

NEI retains the rights to assess the ESG performance of investment process before initial purchase. After initial purchase the NEI ESG team monitors the company to ensure that it continues to meet our ESG expectations.

☒ Engagement, specify

NEI retains the right to engage directly with any of the portfolio companies. We assess the willingness and capacity to collaborate of potential managers in the selection and appointment process.

☒ Voting, specify

NEI retains rights of all corporate actions and voting issues in accordance with NEI's proxy voting guidelines.

☒ Promoting responsible investment

As a strategic initiative, all managers that are replaced must be done so by a manager that has a better ESG profile than the manager that is being replaced.

☐ ESG specific improvements

☐ Other, specify

☒ ESG guidelines/regulation, principles/standards, specify

Adherence to NEI RI policy.

Incentives and controls

☐ Fee based incentive

☒ Communication and remedy of breaches

☐ Termination

☐ No fee/ breach of contract

Reporting requirements

☐ Ad-hoc/when requested

☐ Annually

☐ Bi-annually

☐ Quarterly

☒ Monthly

☒ Fixed income - Corporate (non-financial)

Benchmark

☒ Standard benchmark, specify

Multiple benchmarks used.

☐ ESG benchmark, specify

ESG Objectives

☐ Other, specify

☒ ESG related strategy, specify

All managers under the RS Funds umbrella are required to comply with the NEI Responsible Investment Policy

☒ ESG related investment restrictions, specify

NEI retains the right to impose investment restrictions on external managers. This includes screening companies with primary business activities in tobacco, gambling, adult entertainment, military weapons and nuclear material.

☒ ESG integration, specify

NEI retains the rights to assess the ESG performance of investment process before initial purchase. After initial purchase the NEI ESG team monitors the company to ensure that it continues to meet our ESG expectations.

☒ Engagement, specify

NEI retains the right to engage directly with any of the portfolio companies. We assess the willingness and capacity to collaborate of potential managers in the selection and appointment process.

☒ Voting, specify

NEI retains rights of all corporate actions and voting issues in accordance with NEI's proxy voting guidelines.

☒ Promoting responsible investment

As a strategic initiative, all managers that are replaced must be done so by a manager that has a better ESG profile than the manager that is being replaced.

☐ ESG specific improvements

☐ Other, specify

☒ ESG guidelines/regulation, principles/standards, specify

Adherence to NEI RI policy.

Incentives and controls

☐ Fee based incentive

☒ Communication and remedy of breaches

☐ Termination

☐ No fee/ breach of contract

	Reporting requirements
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- ☐ Ad-hoc/when requested
- ☐ Annually
- ☐ Bi-annually
- ☐ Quarterly
- ☒ Monthly

SAM 04.3	Indicate which of these actions your organisation might take if any of the requirements are not met
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- ☒ Discuss requirements not met and set project plan to rectify
- ☒ Place investment manager on a “watch list”
- ☒ Track and investigate reason for non-compliance
- ☐ Re-negotiate fees
- ☒ Failing all actions, terminate contract with the manager
- ☐ Other, specify
- ☐ No actions are taken if any of the ESG requirements are not met

SAM 04.4	Provide additional information relevant to your organisation’s appointment processes of external managers. [OPTIONAL]
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As per the Investment Policy Statements, some managers are contractually obligated to adhere to the NEI Responsible Investment Policy. In addition, all manager contracts also state that NEI retains the right to vote all proxies in house and conduct independent or joint engagements with companies in the NEI mandates. If a manager does not comply with the above, the first step is to reach out to the manager to given them a chance to review their actions, as a last resort of non-compliance, the manager may be terminated. Non-compliance is considered a breach of contract and therefore can lead to termination of the relationship.

In addition to the manager’s ESG integration, NEI conducts an ESG evaluation of each holding in its portfolios. We recognize that each investment manager has a set of beliefs on responsible investing and varying levels of tolerance on those beliefs. As a result of our secondary ESG evaluation, we may require that a company is excluded from the NEI segregated mandates. As such, in the appointment of managers, we review the manager’s ability and skill in incorporating NEI’s ESG screens and ESG exclusions. As a result, we review and/or work with potential managers to build a process whereby our internal ESG team can collaborate with equity analysts and portfolio managers on ESG risks to create a suitable list of excluded securities.

Monitoring

SAM 05	Mandatory	Public	Core Assessed	PRI 1
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SAM 05.1	When monitoring managers, indicate which of the following types of responsible investment information your organisation typically reviews and evaluates
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	LE	FI - SSA	FI - Corporate (financial)	FI - Corporate (non-financial)				
ESG objectives linked to investment strategy (with examples)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
Evidence on how the ESG incorporation strategy(ies) affected the investment decisions and financial / ESG performance of the portfolio/fund	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
Compliance with investment restrictions and any controversial investment decisions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
ESG portfolio characteristics	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
How ESG materiality has been evaluated by the manager in the monitored period	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
Information on any ESG incidents	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
Metrics on the real economy influence of the investments	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
PRI Transparency Reports	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
PRI Assessment Reports	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
RI-promotion and engagement with the industry to enhance RI implementation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Changes to the oversight and responsibilities of ESG implementation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
Other general RI considerations in investment management agreements; specify	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

SAM 05.2

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

	LE	FI - SSA	FI - Corporate (financial)	FI - Corporate (non-financial)				
ESG score	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
ESG weight	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
ESG performance minimum threshold	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
Real world economy targets	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Other RI considerations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

SAM 05.3

Provide additional information relevant to your organisation's monitoring processes of external managers. [OPTIONAL]

After a security has been purchased, the NEI ESG team monitors the company on ongoing basis for headline risk and to ensure that it continues to meet our ESG expectations. . All securities that are in the S &P/TSX Composite Index are reviewed at least annually using the NEI proprietary ESG evaluation process.

NEI Portfolio and Compliance teams ensure that all securities that have been deemed as ineligible for purchase by the NEI ESG team are not included in any portfolios. If an excluded security is purchased, NEI will work with the manager to remove/replace the security. In addition to restricting purchases of ineligible securities, we work with managers in:

- Replacing the exclusion: We expect that the manager will replace the exclusion with a company that qualifies for the portfolio based on ESG factors.
- Re-weighting the portfolio: In this case, the manager adds to the weight of remaining portfolio companies.
- Deleting the exclusion: In this case, the manager simply deletes the exclusion and no other change occurs.

Outputs and outcomes

SAM 08	Mandatory to Report Voluntary to Disclose	Public	Descriptive	PRI 1
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SAM 08.1

Describe how you ensure that best RI practice is applied to managing your assets

- ☒ Encourage improved RI practices with existing investment managers

Measures

Initiated joint corporate engagements with some managers.
Communicated with all managers about emerging RI standards.
Discussed ESG performance during regular review meetings.

- ☒ Move assets over to investment managers with better RI practices

Measures

RI mandates have moved to managers with stronger ESG processes.
Non-RI mandates have increasingly appointed managers with ESG capacity.
Initiated impact-related investments with new managers

☒ Other, specify

Investment structure that allows for flexibility in integrating NEI's ESG philosophy
Working with managers to communicate NEI Proxy voting practices, such that the manager can align voting on other mandates with NEI

Measures

Review holdings on a weekly basis
Conduct in-house ESG research on each holding
Monitor each portfolio holding for ESG-related headline risk
Maintain discretion on each and every holding since the assets are all managed in separate accounts that are dedicated to us.

☐ None of the above

SAM 08.2	Additional information. [Optional]
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Educating our Investment Managers

NEI has been instrumental in laying the groundwork for responsible investing in Canada. In addition to our leadership role in the Responsible Investment Association (RIA), we have been a resource for our investment managers to evolve their ESG policies and practices. In one particular example, a Canadian investment manager had no ESG capabilities when it began to manage a mandate for us but showed a strong interest in integrating ESG practices into investment decisions. The manager now has full-time ESG personnel on staff.

SAM 09	Mandatory	Public	Additional Assessed	PRI 1,6
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SAM 09.1	Provide examples of how ESG issues have been addressed in the manager selection, appointment and/or monitoring process for your organisation during the reporting year.
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☒ Add Example 1

Topic or issue	Engagement with portfolio companies: Board Oversight
Conducted by	<input checked="" type="checkbox"/> Internal staff
Asset class	<input checked="" type="checkbox"/> All asset classes <input type="checkbox"/> Listed Equity <input type="checkbox"/> Fixed income – SSA <input type="checkbox"/> Fixed income – corporate (financial) <input type="checkbox"/> Fixed income – corporate (non financial)
Scope and process	As part of our on-going efforts to work collaboratively with our sub-advisors, we asked the managers to consider working with us on an investor sign-on opportunity at Alphabet (Google). The sign-on opportunity was to ask Alphabet to include board oversight of societal impacts of their technologies related to data privacy, freedom of expression and artificial intelligence.
Outcomes	A number of managers responded favourably and two managers signed-on.

☒ Add Example 2

Topic or issue	Impact Balanced Fund – Manager Selection
Conducted by	<input checked="" type="checkbox"/> Internal staff
Asset class	<input checked="" type="checkbox"/> All asset classes <input type="checkbox"/> Listed Equity <input type="checkbox"/> Fixed income – SSA <input type="checkbox"/> Fixed income – corporate (financial) <input type="checkbox"/> Fixed income – corporate (non financial)
Scope and process	The NEI Balanced RS funds was one of the first Responsible Balanced fund in Canada. As we considered the next phase of NEI's growth in maintaining our leadership position, we decided to repurpose this fund to an impact-based mandate. While keeping it a public balanced fund, we searched for strategies and managers that create a visible, measurable impact with respect to environmental and social goals.
Outcomes	A decision was made to hire an impact-based fixed income manager to complement an existing thematic, impact equity fund in a balanced portfolio.

- ☐ Add Example 3
- ☐ Add Example 4
- ☐ Add Example 5
- ☐ Add Example 6
- ☐ Add Example 7
- ☐ We are not able to provide examples

SAM 09.2

Additional information.

NEI's ESG team completes a quantitative and qualitative ESG assessment and conducts ongoing risk monitoring of each portfolio holding. At the time of appointment, we assess the manager's ability to incorporate our ESG process and manage the account in accordance with NEI's eligibility list.

On a monthly basis, NEI portfolios are examined to ensure that holdings are aligned with NEI's eligibility list. This is part of the compliance procedure for NEI RS funds and portfolios. On an annual basis, we conduct an on-site review of all managers. A key component of the onsite manager due diligence is an update of the manager's ESG capabilities and how they continue to integrate ESG factors within investment decision making.

Adherence to the NEI Responsible Investment process has been included in the Investment Policy Statement (IPS) for select external managers with ESG mandates. Therefore, any infractions would be considered a breach of the IPS and an in-depth review of the manager and the situation would be initiated.

NEI Investments

Reported Information

Public version

Direct - Listed Equity Active Ownership

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.

Overview

LEA 01	Mandatory	Public	Core Assessed	PRI 2
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New selection options have been added to this indicator. Please review your prefilled responses carefully.

LEA 01.1

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

☒ Yes

LEA 01.2

Attach or provide a URL to your active ownership policy.

☐ Attachment provided:

☒ URL provided:

URL

<https://www.neiinvestments.com/documents/Marketing/RI%20Policy.pdf>

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)

Note that these details are in our publicly available proxy voting guidelines (not the RI policy)

- ☐ Other
- ☐ None of the above

☐ No

LEA 01.4

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

- ☐ Yes
- ☒ No

LEA 01.6

Additional information [optional]

Our approach to engagement is described in our Responsible Investment Policy and various other documents, including our Proxy Voting Guidelines. Key documents and significant changes of policy are reviewed by our ESG Working Group and Asset Management Operating Committee.

Across all our funds, we use the special rights that come with shareholder status to expand our investable universe and create positive change on behalf of our investors. Through engagement, we alert companies to ESG risks, propose solutions to the tough challenges they face and encourage them to improve their ESG performance - seeking to protect value for shareholders and keep companies accountable to all stakeholders.

We draw on established norms to define our approach, including the Principles for Responsible Investment, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines, a corporate responsibility standard endorsed by the Government of Canada. Through corporate engagement we also seek to support the Sustainable Development Goals (SDGs) - a worldwide effort by governments, business and civil society to end poverty and ensure opportunity for all, within planetary resource boundaries, by pursuing 17 environmental, social and governance goals between now and 2030.

Our Corporate Engagement Program is applied across all our listed equity holdings and consists of three main elements:

Corporate Dialogues:

- The centrepiece of our corporate engagement approach is the Focus List: in-depth dialogues, announced at the start of the year, on a range of specific ESG issues, conducted independently or through collaboration, targeting at least 25% of our holdings. We also undertake tactical dialogues in response to emerging risks and opportunities: these include companies identified through our evaluations process where there are concerns about lack of disclosure or effectiveness of mitigation of key sector ESG risks that could threaten company value, as well as companies currently facing major ESG challenges that have been identified through our Management Breach Investigation and/or OECD Due Diligence processes. In addition, we undertake stewardship outreach focusing on governance matters to all our larger and/or significant holdings.
- We select companies for dialogue with consideration for: investment exposure - the scale of holdings within our funds; risk and opportunity exposure - the significance of the ESG issues identified; impact potential -

where our intervention is most likely to result in change. Our engagement focuses on companies where we have holdings, although we may also engage with companies where ESG concerns are creating a barrier to investment.

- Our preferred tool is constructive dialogue, but we will escalate to filing or co-filing shareholder proposals where necessary, if we feel dialogue is not progressing.
- We reach out to company contacts at various levels (board, senior management, IR, corporate governance, sustainability, operations) depending on nature of the topic and the degree of escalation that we deem it requires.
- We also respond to many proactive requests from companies for investor perspective on sustainability issues.

Proxy Voting

- Transparent, engaged voting on company annual meeting agenda items based on guidelines promoting sustainability and good governance.
- "Feedback on Proxy" - input to companies on governance practices as part of Corporate Dialogues.

Public Policy

- Engaging policy-makers on corporate regulations and standards to create broader change and facilitate responsible investment.
- Participation in multi-stakeholder sustainability initiatives.

Engagement is carried out by our in-house team, who receive internal training and coaching from senior engagement staff as well as attending engagement-focused conferences and calls to exchange with peers. In some cases we may engage collaboratively alongside external manager subadvisors that also have engagement capacity.

We have procedures in place to address conflict of interest and the potential for selective disclosure of material information. An individual ESG team member does not vote on a company where a conflict of interest exists, and we undertake a process to track this. At the start of all engagement meetings, we renew our agreement with the company that, while the ESG issues under discussion may be material to the long-term performance of the company, no material undisclosed information will be sought or divulged, and we undertake a compliance process to track this.

If a company is unresponsive to repeated engagement effort on a critical ESG issue, a decision may be taken to divest the holding.

We track all engagement and publish quarterly and annual updates on the progress of company dialogues and policy interventions on our website.

Details of our approach to proxy voting can be found in our Proxy Voting Guidelines
<https://www.neiinvestments.com/pages/responsible-investing/esg-difference/proxy-voting/>

Engagement				
LEA 02	Mandatory	Public	Core Assessed	PRI 1,2,3
LEA 02.1	Indicate the method of engagement, giving reasons for the interaction.			

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]

Our company was a pioneer of corporate engagement in the Canadian market. Our engagement program has been in place for two decades and we have long-established and highly-experienced internal corporate engagement capacity. Undertaking our own engagement allows for better integration between our company research and evaluations process, our corporate dialogues, our proxy voting and our public policy work; it enables rapid response to emerging issues; and it ensures that our engagement efforts remain linked to our portfolio exposure. We believe that by conducting our own engagement as a shareholder, whether individually or in collaborations, we may better focus on how our dialogue can contribute to company value.

That said, we have long engaged the Canadian Coalition for Good Governance to explore how its well-established program of corporate governance engagement with Canadian corporate boards could enhance input and participation from members, and integrate questions relating to the governance of environmental and social issues.

LEA 03

Mandatory

Public

Core Assessed

PRI 2

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

LEA 03.1

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

☒ Yes

LEA 03.2

Indicate the criteria used to identify and prioritise engagements for each type of engagement.

Type of engagement	Criteria used to identify/prioritise engagements
Individual / Internal staff engagements	<div>Individual / Internal staff engagements</div> <ul style="list-style-type: none"> <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 type="checkbox"/> Consultation with clients/beneficiaries <input 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
Collaborative engagements	<div>Collaborative engagements</div> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Potential to enhance knowledge of ESG issues through other investors <input checked="" type="checkbox"/> Ability to have greater impact on ESG issues <input checked="" type="checkbox"/> Ability to add value to the collaboration <input checked="" type="checkbox"/> Geography/market of the companies targeted by the collaboration <input checked="" type="checkbox"/> Materiality of the ESG factors addressed by the collaboration <input checked="" type="checkbox"/> Exposure (size of holdings) to companies targeted by the collaboration <input checked="" type="checkbox"/> Responses to ESG impacts addressed by the collaboration that have already occurred <input type="checkbox"/> Responses to divestment pressure <input type="checkbox"/> Follow-up from a voting decision <input checked="" type="checkbox"/> Alleviate the resource burden of engagement <input type="checkbox"/> Consultation with clients/beneficiaries <input type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) <input type="checkbox"/> Other; (specify) <input type="checkbox"/> We do not outline engagement criteria for our collaborative engagement providers

☐ No

LEA 03.3	Additional information. [Optional]
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We do on occasion engage companies in collaboration with our sub-advisors. In those situations we prioritize the engagement targets based on a combination of our regular factors (e.g. materiality of the issues) but with a greater focus on the pre-existing relationships of the sub-advisor and the geography of the companies. We share the engagement duties once the companies have been identified.

LEA 04	Mandatory	Public	Core Assessed	PRI 2
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New selection options have been added to this indicator. Please review your prefilled responses carefully.

LEA 04.1	Indicate whether you define specific objectives for your organisation's engagement activities.
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Individual / Internal staff engagements	<input checked="" type="radio"/> All engagement activities <input type="radio"/> Majority of engagement activities <input type="radio"/> Minority of engagement activities <input type="radio"/> We do not define specific objectives for engagement activities carried out by internal staff
Collaborative engagements	<input checked="" type="radio"/> All engagement activities <input type="radio"/> Majority of engagement activities <input type="radio"/> Minority of engagement activities <input type="radio"/> We do not define specific objectives for engagement activities carried out through collaboration

LEA 04.2	Additional information. [Optional]
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Note that for some sign-on activities we may have an engagement objective defined, but depending on the level of participation we may not track performance against these objectives in the same way we do for engagements where we are the lead or are acting solo.

LEA 05	Mandatory	Public	Core Assessed	PRI 2
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LEA 05.1	Indicate whether you monitor and/or review engagement outcomes.
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Individual / Internal staff 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 by our internal staff.
Collaborative 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 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 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 checked="" type="checkbox"/> Track and/or monitor the progress of action taken when original objectives are not met <input checked="" 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 checked="" type="checkbox"/> Track and/or monitor the progress of action taken when original objectives are not met <input checked="" type="checkbox"/> Revisit and, if necessary, revise objectives on a continuous basis <input type="checkbox"/> Other; specify

LEA 05.3

Additional information. [Optional]

As noted previously, for some sign-on activities we do not follow up and monitor progress in the same manner as we do for engagements where we are the lead or engaging solo. This is a prioritization we undertake to ensure that we maximize the outcomes from the engagements where we are spending the most time and effort.

LEA 06

Mandatory

Public

Additional Assessed

PRI 2,4

LEA 06.1

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

☒ Yes

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 continually assess the progress of our engagements to determine if an escalation strategy is required. We may undertake several escalations at once - for example filing a shareholder resolution and voting against key directors. In situations where we have exhausted our options for influencing the company, and do not see any reasonable chance of our key concerns being addressed, we will divest of the company. At that point we follow a process that determines when the company can be considered for eligibility again. This includes a combination of factors that must be present, including the resolution of the key issue of concern; change in key management/leadership at the company; and the passing of a "cooling off" period of up to 3 years depending on the severity of the issue.

We believe that a credible engagement strategy must have the ability to divest if there is no reasonable chance of engagement success. However, we also believe that in order for companies to be incented to respond to engagement they must be able to make their way back into the portfolio as well.

LEA 07

Voluntary

Public

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.
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- ☐ Involving investment decision-makers when developing an engagement programme
☒ Holding investment team meetings and/or presentations
☐ Using IT platforms/systems that enable data sharing
☐ Internal process that requires portfolio managers to re-balance holdings based on interaction and outcome levels
☒ Other; specify
 We provide quarterly updates on our engagement program to internal portfolio management staff and external portfolio managers
☐ None

LEA 07.3	Indicate whether insights gained from your organisation's engagements are shared with your clients/beneficiaries.
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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 07.4	Additional information. [Optional]
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Several categories of engagement within our program are derived from the results of our internal ESG company evaluations program. We undertake tactical dialogues in response to emerging risks and opportunities: these include companies identified through our evaluations process where there are concerns about lack of disclosure or effectiveness of mitigation of key sector ESG risks that could threaten company value, as well as companies currently facing major ESG challenges that have been identified through our Management Breach Investigation and/or OECD Due Diligence processes. ESG company evaluations and information relating to engagement is collected within a single database.

Our internal corporate engagement staff share annual plans and quarterly updates on all corporate engagement with both internal portfolio management colleagues and external portfolio managers. In the case of some of our external portfolio managers who have internal engagement capacity, we develop an engagement strategy for the portfolio companies together and work collaboratively on dialogues.

In the context of our OECD Due Diligence process, we reach out to external portfolio managers where portfolio companies have been identified as being associated with severe adverse impacts, to share insights and determine whether we need to engage directly.

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

LEA 08.2 Additional information. [Optional]

We maintain records on dialogue topics, engagement activities and associated documents such as letters and meeting notes for each company in a custom database that allows us to generate reports for engagement management and evaluation purposes. We track the progress of engagements, taking into consideration three factors: progress towards the achievement of each engagement objective associated with the company, the degree of responsiveness of the company to engagement and the amount of our own effort that has gone into the engagement. We provide quarterly public disclosures on the activity metrics (including deeper dives on selected engagements) and on an annual basis provide disclosure on the progress/success metrics we track.

Outputs and outcomes

LEA 09	Mandatory to Report Voluntary to Disclose	Public	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.

	We did not complete any engagements in the reporting year.	Number of companies engaged (avoid double counting, see explanatory notes)	Proportion of companies engaged with, out of total listed equities portfolio
Individual / Internal staff engagements	<input type="checkbox"/>	64	20
Collaborative engagements	<input type="checkbox"/>	88	12

LEA 09.2 Indicate the breakdown of engagements conducted within the reporting year by the number of interactions (including interactions made on your behalf).

No. of interactions with a company	% of engagements
One interaction	<input type="radio"/> >76% <input checked="" type="radio"/> 51-75% <input type="radio"/> 11-50% <input type="radio"/> 1-10% <input type="radio"/> None
2 to 3 interactions	<input type="radio"/> >76% <input type="radio"/> 51-75% <input checked="" type="radio"/> 11-50% <input type="radio"/> 1-10% <input type="radio"/> None
More than 3 interactions	<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	100%

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 09.5

Additional information. [Optional]

Note that where we had a solo engagement and a collaborative engagement with a company, we only counted the solo engagement to avoid double counting.

LEA 10	Voluntary	Public	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

(specify)

Participation in stakeholder panels, collaboration with companies in multi-stakeholder initiatives, consultation with industry associations, engagement collaboration with portfolio sub-advisors

- ☒ In a minority of cases
- ☐ In a majority of cases
- ☐ In all cases

LEA 10.2

Additional information. [Optional]

In our view, investors should use the mode of engagement that is most efficient and effective in achieving a specific ESG objective at a specific company, with appropriate escalation as required. If the dialogue objective can be achieved by sending a single letter or email, so much the better, although in our experience persistence and considerable effort are required to achieve major objectives.

We participate frequently in other modes of engagement that are not mentioned under this indicator, and that we believe can be helpful in advancing ESG objectives, including:

- participation in a company's formal ESG stakeholder panel process - companies are particularly open to ESG input at these sessions
- meetings with the board on ESG issues (especially governance)
- meetings with senior management on ESG issues (outside the roadshow structure)
- engaging with industry associations for sector-wide change

- working alongside companies in multi-stakeholder ESG leadership initiatives.

LEA 11	Voluntary	Public	Descriptive	PRI 2
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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	<p>Climate Change</p> <p><input type="checkbox"/> Executive Remuneration</p> <p><input checked="" type="checkbox"/> Climate Change</p> <p><input type="checkbox"/> Human rights</p> <p><input type="checkbox"/> Company leadership issues</p> <p><input type="checkbox"/> Pollution</p> <p><input type="checkbox"/> General ESG</p> <p><input type="checkbox"/> Diversity</p> <p><input type="checkbox"/> Shareholder rights</p> <p><input type="checkbox"/> Health and Safety</p> <p><input type="checkbox"/> Sustainability reporting</p> <p><input type="checkbox"/> Water risks</p> <p><input type="checkbox"/> Labour practices and supply chain management</p> <p><input type="checkbox"/> Anti-bribery and corruption</p> <p><input type="checkbox"/> Deforestation</p> <p><input type="checkbox"/> Aggressive tax planning</p> <p><input type="checkbox"/> Cyber security</p> <p><input type="checkbox"/> Other governance</p> <p><input type="checkbox"/> Plastics</p> <p><input type="checkbox"/> Other</p>
Conducted by	<p><input checked="" type="checkbox"/> Individual / Internal</p> <p><input type="checkbox"/> Collaborative</p>
Objectives	<p>Getting Real About the Energy Transition: Climate Strategy for Energy Producers and Users</p> <p>To achieve a socially-just, well-managed transition to a low-carbon economy, and effectively tackle climate risk, we believe action is needed by companies on both the supply and demand sides of the energy equation. As the first Canadian investment institution to back the Carbon Disclosure Project (CDP) survey in 2002, we have been urging Canadian companies to reduce emissions, address climate risk and enhance disclosure for almost two decades. We also support the recommendations of the Taskforce on Climate-related Financial Disclosure (TCFD), which address systemic risk to the financial system by promoting investor-oriented reporting of material climate information by all companies and seek to encourage all companies in our holdings to respond to the recommendations, as appropriate to their sector and level of exposure to climate risk. As well, we are pushing leading companies to commit to aligning with the goal of a net zero future by 2050.</p>
Scope and Process	<p>In 2019, we engaged over 40 companies across our global holdings on the TCFD recommendations, either individually or in the context of the Climate Action 100+ collaborative engagement.</p> <ul style="list-style-type: none"> • We continued intensive dialogue with oil and gas companies on strategies for navigating the transition to a low-carbon economy. We also co-organized an event for the third year in a row with CDP where over 20 energy companies discussed carbon disclosure challenges with investors.

	<ul style="list-style-type: none"> • Canadian Natural Resources, Cenovus Energy and Teck Resources all announced plans to be net zero - with Cenovus and Teck committing to a 2050 timeline specifically. • We also continued our engagement with the major Canadian banks on their response to the TCFD.
Outcomes	<input type="checkbox"/> Company changed practice <input checked="" type="checkbox"/> Company committed to change <input type="checkbox"/> Disclosure / report published <input type="checkbox"/> Divestment <input type="checkbox"/> Failed/no outcome <input type="checkbox"/> Increased understanding / information <input type="checkbox"/> Invested in company <input type="checkbox"/> Ongoing <input type="checkbox"/> Voting <input type="checkbox"/> Other

☒ Add Example 2

ESG Topic	<p>Human rights</p> <p><input type="checkbox"/> Executive Remuneration</p> <p><input type="checkbox"/> Climate Change</p> <p><input checked="" type="checkbox"/> Human rights</p> <p><input type="checkbox"/> Company leadership issues</p> <p><input type="checkbox"/> Pollution</p> <p><input type="checkbox"/> General ESG</p> <p><input type="checkbox"/> Diversity</p> <p><input type="checkbox"/> Shareholder rights</p> <p><input type="checkbox"/> Health and Safety</p> <p><input type="checkbox"/> Sustainability reporting</p> <p><input type="checkbox"/> Water risks</p> <p><input type="checkbox"/> Labour practices and supply chain management</p> <p><input type="checkbox"/> Anti-bribery and corruption</p> <p><input type="checkbox"/> Deforestation</p> <p><input type="checkbox"/> Aggressive tax planning</p> <p><input type="checkbox"/> Cyber security</p> <p><input type="checkbox"/> Other governance</p> <p><input type="checkbox"/> Plastics</p> <p><input type="checkbox"/> Other</p>
Conducted by	<p><input checked="" type="checkbox"/> Individual / Internal</p> <p><input type="checkbox"/> Collaborative</p>
Objectives	<p>To encourage companies in our portfolio to actively engage with the Equator Principles review process, and to specifically endorse changes that would align the Equator Principles with best practices in respecting Indigenous rights. We had the following objectives we wanted companies to pursue:</p> <ul style="list-style-type: none"> • Eliminate the distinction between the applicable environmental and social standards that the EP signatories must meet in high-income versus lower income countries (known as Designated and non-Designated Countries) to avoid a situation like DAPL where U.S. law did not meet environmental and social standards despite it being a high-income country. • To demonstrate effective stakeholder engagement, require EP signatories to implement the IFC Performance Standard 7 on Indigenous Peoples where Indigenous Peoples' rights are at risk. • To demonstrate a strong alignment with the United Nations Guiding Principles on Business and Human Rights, enhance the reporting framework by requiring disclosures of the EP signatories' human rights due diligence processes.
Scope and Process	<p>In 2019 we engaged 35 banks in our portfolio on this issue - writing to encourage them to support revisions to the Equator Principles framework that aligned the above asks. As well, we had in-depth engagements with the big Canadian banks in our portfolio (e.g. RBC, CIBC, TD, BMO, Scotiabank) on their specific approach to ensuring their lending practices were not negatively impacting Indigenous rights.</p>

	<p>We also engaged the Equator Principles Association directly to encourage the adoption of a robust framework around Indigenous rights. We were also co-leads on a letter to the Equator Principles Association asking them to align the framework with the UN Guiding Principles on Business and Human Rights - including protecting Indigenous rights.</p>
Outcomes	<p> <input type="checkbox"/> Company changed practice <input type="checkbox"/> Company committed to change <input checked="" type="checkbox"/> Disclosure / report published <input type="checkbox"/> Divestment <input type="checkbox"/> Failed/no outcome <input type="checkbox"/> Increased understanding / information <input type="checkbox"/> Invested in company <input type="checkbox"/> Ongoing <input type="checkbox"/> Voting <input type="checkbox"/> Other </p>

☒ Add Example 3

ESG Topic	<p>Human rights</p> <p><input type="checkbox"/> Executive Remuneration</p> <p><input type="checkbox"/> Climate Change</p> <p><input checked="" type="checkbox"/> Human rights</p> <p><input type="checkbox"/> Company leadership issues</p> <p><input type="checkbox"/> Pollution</p> <p><input type="checkbox"/> General ESG</p> <p><input type="checkbox"/> Diversity</p> <p><input type="checkbox"/> Shareholder rights</p> <p><input type="checkbox"/> Health and Safety</p> <p><input type="checkbox"/> Sustainability reporting</p> <p><input type="checkbox"/> Water risks</p> <p><input type="checkbox"/> Labour practices and supply chain management</p> <p><input type="checkbox"/> Anti-bribery and corruption</p> <p><input type="checkbox"/> Deforestation</p> <p><input type="checkbox"/> Aggressive tax planning</p> <p><input type="checkbox"/> Cyber security</p> <p><input type="checkbox"/> Other governance</p> <p><input type="checkbox"/> Plastics</p> <p><input type="checkbox"/> Other</p>
Conducted by	<p><input type="checkbox"/> Individual / Internal</p> <p><input checked="" type="checkbox"/> Collaborative</p>
Objectives	<p>Advancing Digital Human Rights</p> <p>Technological devices and digital services are increasingly embedded in our lives. In exchange for interconnectivity and efficiency benefits, we entrust our personal data to companies but privacy breaches and data controversies put users at risk and can impact company value.</p>
Scope and Process	<p>As a Steering Committee member of the Investor Alliance for Human Rights, we led a global statement on corporate accountability for digital rights, setting out expectations for ICT companies' responsibility to respect user privacy and free expression and endorsing the Ranking Digital Rights Corporate Accountability Index, which assesses the largest ICT companies. The statement, signed by 49 investors, signalled the start of collaborative engagement with companies such as Apple, Microsoft, Facebook and Vodafone.</p> <p>NEI has teamed up with fellow Alphabet investors Hermes, Robeco and The Sustainability Group of Loring Wolcott & Coolidge to bring our concerns to the board of directors. We wrote a comprehensive letter outlining these concerns and requested to meet with the company. We asked other investors with similar concerns if they wanted to collaborate and received overwhelming support: over 80 institutional investors signed on to our letter, representing close to US\$10 trillion of assets under management. Despite months of work, Alphabet's response was dismissive and disappointing. We decided to escalate the engagement and filed a shareholder proposal asking the company to adopt human rights oversight at the board.</p>
Outcomes	<p><input type="checkbox"/> Company changed practice</p> <p><input type="checkbox"/> Company committed to change</p>

	<input type="checkbox"/> Disclosure / report published <input type="checkbox"/> Divestment <input type="checkbox"/> Failed/no outcome <input type="checkbox"/> Increased understanding / information <input type="checkbox"/> Invested in company <input checked="" type="checkbox"/> Ongoing <input type="checkbox"/> Voting <input type="checkbox"/> Other
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☒ Add Example 4

ESG Topic	<p>Other governance</p> <p><input type="checkbox"/> Executive Remuneration</p> <p><input type="checkbox"/> Climate Change</p> <p><input type="checkbox"/> Human rights</p> <p><input type="checkbox"/> Company leadership issues</p> <p><input type="checkbox"/> Pollution</p> <p><input type="checkbox"/> General ESG</p> <p><input type="checkbox"/> Diversity</p> <p><input type="checkbox"/> Shareholder rights</p> <p><input type="checkbox"/> Health and Safety</p> <p><input type="checkbox"/> Sustainability reporting</p> <p><input type="checkbox"/> Water risks</p> <p><input type="checkbox"/> Labour practices and supply chain management</p> <p><input type="checkbox"/> Anti-bribery and corruption</p> <p><input type="checkbox"/> Deforestation</p> <p><input type="checkbox"/> Aggressive tax planning</p> <p><input type="checkbox"/> Cyber security</p> <p><input checked="" type="checkbox"/> Other governance</p> <p><input type="checkbox"/> Plastics</p> <p><input type="checkbox"/> Other</p>
Conducted by	<p><input type="checkbox"/> Individual / Internal</p> <p><input checked="" type="checkbox"/> Collaborative</p>
Objectives	<p>Investors for Opioid Accountability</p> <p>There were almost 4,000 opioid-related deaths in Canada in 2017, and the role of prescription medicine in the North American opioid crisis has been under increasing legal and regulatory scrutiny. The Investors for Opioid Accountability coalition engaged U.S. pharmaceutical company boards on how they are responding to public concern and business risks related to opioids.</p>
Scope and Process	<p>Since 2017 we have been the only Canadian investor member of the Investors for Opioid Accountability (IOA) coalition, which holds pharmaceutical companies, pharmacy retailers and distributors accountable for their role in the North American opioid crisis. This season we voted for all shareholder proposals IOA members filed at companies such as Walgreens Boots Alliance, CVS Health and Johnson & Johnson. 60% of Walgreens investors supported a proposal asking the board to produce a regular report on how it manages the risk of distributing opioids. At Johnson & Johnson, a proposal asking for more details on when it claws back executive compensation in relation to the opioid crisis received 46% support.</p> <p>We co-authored a set of governance principles for companies engaged in the sale of opioids. These principles have been used as a guide for further engagement with the IOA coalition.</p> <p>We also co-filed a shareholder proposal at J&J together with the New York City Comptroller, the lead filer. We wanted to understand when and if the company uses its clawback policy to rescind bonus compensation from executives due to financial or ethical misconduct. We withdrew our proposal as the company met our ask.</p>

Outcomes	<input checked="" type="checkbox"/> Company changed practice <input type="checkbox"/> Company committed to change <input type="checkbox"/> Disclosure / report published <input type="checkbox"/> Divestment <input type="checkbox"/> Failed/no outcome <input type="checkbox"/> Increased understanding / information <input type="checkbox"/> Invested in company <input type="checkbox"/> Ongoing <input type="checkbox"/> Voting <input type="checkbox"/> Other
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- ☐ Add Example 5
- ☐ Add Example 6
- ☐ Add Example 7
- ☐ Add Example 8
- ☐ Add Example 9
- ☐ Add Example 10

LEA 11.2	Additional information. [Optional]
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Details of all the engagement carried out during the year can be found on our website:
<https://www.neiinvestments.com/pages/about-nei/about-ethical-funds/esg-difference/corporate-engagements/>

(Proxy) voting and shareholder resolutions

LEA 12	Mandatory	Public	Descriptive	PRI 2
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LEA 12.1	Indicate how you typically make your (proxy) voting decisions.
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	Approach
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- ☐ 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
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- ☐ The service-provider voting policy we sign off on
- ☐ Our own voting policy
- ☐ Our clients' requests or policies
- ☒ Other (explain)

We use our own proxy voting guidelines for North American holdings and our service provider's guidelines for international holdings.

- ☐ 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.

LEA 12.2

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

Our Proxy Voting Guidelines are used to vote the proxies of all holdings in North America, while we utilize the ISS SRI guidelines for international holdings. NEI retains the right to vote proxies and regards the proxies we hold on behalf of our unit holders as significant corporate assets. We make use of external research providers for proxy voting analysis. Our ESG analysts review proxy information and third-party analysis and execute the proxy voting process for our funds. Items on the agenda are individually reviewed and analyzed. The final voting decision is influenced by our guidelines, internal analysis and consideration of how we believe we can best advance corporate governance good practice at each company.

The guidelines are designed to be responsive to a wide range of issues that can be raised in proxy situations. Because we cannot anticipate every proxy item, as well as specific guidelines for certain commonly-arising matters, we have established general principles for assessing proposals. Many proposals require case-by-case vote decision-making. In these situations, we look to our ESG Program criteria and corporate engagement goals for direction.

Our guidelines are oriented to the North American markets to which we are most exposed. Some guidelines are specific to certain focus markets, and we may modify our approach on a case-by-case basis, depending on the level of compliance to local market laws and corporate governance best practices that a company demonstrates.

Because of our strong position on many ESG issues, we frequently vote against the recommendations put forward by company management. However, we see no value in voting against management for its own sake. Where we are able to vote with management because standards of governance are improving, we view that outcome positively.

Our Guidelines are reviewed every two years to determine if an update is required, based on developments in corporate governance or the regulatory landscape. We may publish amendments between full updates.

Our vote notes outline where we have made exception to our guidelines and the rationale for our decision. We collect data to be able to track exceptions, to enable us to determine if our guidelines need to be updated.

LEA 14

Voluntary

Public

Additional Assessed

PRI 2

LEA 14.1

Does your organisation have a securities lending programme?

☒ Yes

LEA 14.3

Indicate how the issue of voting is addressed in your securities lending programme.

- ☒ We recall all securities for voting on all ballot items
- ☐ We maintain some holdings, so that we can vote at any time
- ☐ We systematically recall some securities so that we can vote on their ballot items (e.g., in line with specific criteria)
- ☐ We recall some securities so that we can vote on their ballot items on an ad-hoc basis
- ☐ We empower our securities-lending agent to decide when to recall securities for voting purposes
- ☐ We do not recall our securities for voting purposes
- ☐ Other (specify)
- ☐ No

LEA 14.4**Additional information. [Optional]**

Securities lending transactions are subject to the requirements of the Canadian securities administrators and the agreement that we have entered into with our securities lending agent. These requirements are designed to minimize risk and they include the following:

- The Manager may lend Canadian and U.S. securities in a manner that is consistent with the Fund's investment strategies and as permitted by securities law, in which case it will aim to recall all loaned securities by the record date for the purpose of voting. The Manager does not intend to lend securities outside of these markets as this may affect its ability to vote on behalf of our unit holders.
- The borrower of the securities must provide collateral permitted by the Canadian securities administrators worth at least 102% of the value of the securities loaned.
- The Funds will only deal with borrowers who have been approved by the Manager and the securities lending agent and the borrowers will be subject to transaction and credit limits.
- No more than 50% of a Fund's assets may be loaned in such transactions.
- The value of the securities and collateral will be monitored daily.
- The Fund may only invest the cash collateral in qualifying securities (such as Canadian and U.S. government debt securities and debt securities with a prescribed credit rating) having a remaining term to maturity of no more than 90 days.
- If a borrower fails to return securities, our securities lending agent will pay to the Fund the market value of those securities.
- Internal controls, procedures and records will be maintained.
- Securities lending transactions may be terminated at any time.

LEA 15**Mandatory****Public****Descriptive****PRI 2****LEA 15.1**

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

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

LEA 15.2

Indicate the reasons for raising your concerns with these companies ahead of voting.

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

LEA 15.3	Additional information. [Optional]
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We take a strong line on corporate governance issues, given the established link between good governance and corporate performance, and as a result we are obliged to vote against management fairly frequently, although through dialogue we have encouraged many companies in our holdings to enhance their practices in such a way that we are able to support management in our voting.

As a result, it is not practicable for us to reach out directly to warn every company where we are considering a vote against management. We especially prioritize advance voting outreach to companies to which our funds are significantly exposed, significant holdings (over 1% of the company float), companies in selected target markets, and companies facing votes on specific ESG issues on which we are engaging and where our perspective may be helpful.

All companies can access our vote decision and rationale through our public voting database. We conduct outreach to ensure that companies know where to find our guidelines and database.

LEA 16	Mandatory	Public	Core Assessed	PRI 2
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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.
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- ☒ 100%
- ☐ 99-75%
- ☐ 74-50%
- ☐ 49-25%
- ☐ 24-1%
- ☐ We do not communicate the rationale to companies
- ☐ Not applicable because we and/or our service providers did not abstain or vote against management recommendations

LEA 16.3	In cases where your organisation does communicate the rationale for abstaining or voting against management recommendations, indicate whether this rationale is made public.
-----------------	--

- ☒ Yes
- ☐ No

LEA 16.4	Additional information. [Optional]
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Our votes and rationales are immediately made public through our proxy voting database, and we direct companies where to find this information, recognizing that it can be challenging for companies to identify beneficial owners. We also reach out proactively to provide more detailed analysis of our vote decisions to selected companies in the context of our engagement program.

LEA 17	Mandatory	Public	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.
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- ☒ We do track or collect this information

	Votes cast (to the nearest 1%)
--	--------------------------------

	%
--	---

97

	Specify the basis on which this percentage is calculated
--	--

- ☐ Of the total number of ballot items on which you could have issued instructions
- ☒ Of the total number of company meetings at which you could have voted
- ☐ Of the total value of your listed equity holdings on which you could have voted
- ☐ We do not track or collect this information

LEA 17.2	Explain your reason(s) for not voting on certain holdings
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- ☒ Shares were blocked
- ☒ Notice, ballots or materials not received on time
- ☐ Missed deadline
- ☒ Geographical restrictions (non-home market)
- ☐ Cost
- ☐ Conflicts of interest
- ☐ Holdings deemed too small
- ☒ Administrative impediments (e.g., power of attorney requirements, ineligibility due to participation in share placement)
- ☐ Client request
- ☒ Other (explain)

We make best efforts not to vote where we have sold the holding and no longer have an economic interest.

LEA 17.3	Additional information. [Optional]
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Where practicable and in the best interest of the funds, we endeavour to vote all proxies where we retain an economic interest at the time of voting. We make best efforts to identify ballots where we have sold the holding between the record date and the meeting date, and not to vote these proxies.

LEA 18	Voluntary	Public	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:
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Voting instructions	Breakdown as percentage of votes cast
For (supporting) management recommendations	<div> <div></div> <div>%</div> </div> 70
Against (opposing) management recommendations	<div> <div></div> <div>%</div> </div> 30
Abstentions	<div> <div></div> <div>%</div> </div> 0

100%

☐ 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.
-----------------	---

LEA 18.4	Additional information. [Optional]
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We take a strong line on corporate governance issues and as a result we are obliged to vote against management frequently, although through dialogue we have encouraged many companies in our holdings to enhance their practices in such a way that we are able to support management in our voting.

We were not able to answer LEA 18.3 as we do not have easy way to collate the number of ballot items voted against management with the number of companies engaged overall by the dialogue program. However, we do engage companies post-vote to explain how we voted and to encourage them to adopt stronger governance practices. Because of the number of votes we cast against management, it would be infeasible to engage all of the companies where we voted against management, so we take a more directed approach and engage our significant holdings or focus on companies where we had significant governance concerns.

All companies can access our vote decision and rationale through our public voting database.

LEA 19	Mandatory	Public	Core Assessed	PRI 2
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LEA 19.1	Indicate whether your organisation has a formal escalation strategy following unsuccessful voting.
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☒ Yes

☐ No

LEA 19.2	Indicate the escalation strategies used at your organisation following abstentions and/or votes against management.
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- ☒ Contacting the company's board
- ☒ Contacting the company's senior management
- ☐ Issuing a public statement explaining the rationale
- ☒ Initiating individual/collaborative engagement
- ☐ Directing service providers to engage
- ☐ Reducing exposure (holdings) / divestment
- ☐ Other

LEA 19.3	Additional information. [Optional]
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We consider votes against management to be one of the various tools we can use to express our level of satisfaction. In some cases the vote against is the escalation of a dialogue that is not advancing - for example, we may vote against directors when they have failed in oversight of a critical ESG concern and the company is not responding to dialogue. In this case the vote against directors is the escalation strategy itself - and if dialogue with senior management has stalled, applying pressure to the board is another angle to apply pressure on the company. In other cases we initiate dialogue as a result of a vote against - for example, we have concerns about the composition of the board put forward for election at the AGM, vote against specific nominees and reach out to the company to explain the vote against. Diversity engagement is often initiated by our proxy voting program, and we use the vote against management as the jumping off point to begin the dialogue. However, we do not escalate every dialogue based on a vote against management - this would be impractical considering the number of votes we cast against management.

LEA 20	Voluntary	Public	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.
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☒ Yes

LEA 20.2	Indicate the number of ESG shareholder resolutions you filed or co-filed.
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	Total number
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6

☐ No

LEA 20.3	Indicate what percentage of these ESG shareholder resolutions resulted in the following:
-----------------	--

Went to vote	<div><div></div>%</div> 50
Were withdrawn due to changes at the company and/or negotiations with the company	<div><div></div>%</div> 50
Were withdrawn for other reasons	<div><div></div>%</div> 0
Were rejected/not acknowledged by the company	<div><div></div>%</div> 0

	Total
--	-------

100%

LEA 20.4	Of the ESG shareholder resolutions that you filed or co-filed and that were put to a vote (i.e., not withdrawn), indicate the percentage that received approval:
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	>50%
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1

LEA 20.5	Describe the ESG shareholder resolutions that you filed or co-filed, and the outcomes achieved.
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Note that at the time of filling out the PRI report, only one of the three resolutions that were not withdrawn had been put to a vote. The other two had still not been voted.

Alphabet: We co-filed a resolution asking the company to develop board oversight of human rights issues. Our concerns stemmed from serious risks the company faces in regard to privacy, the use of AI, and freedom of expression. It has not been voted on yet.

Chevron: We co-filed a resolution with the company asking the company to commission a third party report assessing the effectiveness of Chevron's efforts to prevent, mitigate and remedy human rights concerns. It has not been voted on yet.

BP: We co-filed a resolution with the company asking the company to align its business strategy with the goals of the Paris Accord. The company supported the proposal and it passed with 99% support.

LEA 20.6	Describe whether your organisation reviews ESG shareholder resolutions filed by other investors.
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Our principles for reviewing shareholder proposals are set out in our proxy voting guidelines. Proposals are evaluated on a case-by-case basis, considering the following principles.

The following are considerations to vote for a shareholder proposal.

- The proposal addresses a clear risk or opportunity for the long-term sustainable value of the company (for example, demonstrated by controversies, litigation, fines, or research by reputable sources).

- The proposal supports values to which we are committed (such as international standards, norms, conventions, and fundamental rights that we endorse).
- The proposal will enhance disclosure on key issues allowing us to better assess the company's exposure to risk and opportunities.
- The company's current response to the issue raised in the proposal makes it an outlier compared to peers.
- The company's rebuttal of the proposal is unconvincing.
- The proponent has made good faith offers to engage the company on the issue, but the company has refused to engage, or it has not been possible to reach a withdrawal agreement.

LEA 20.7	Additional information. [Optional]
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Note that we see filing a resolution (with the exception of management-supported resolutions) as a tool to move a stalled dialogue forward. Generally speaking, we do not initiate a dialogue through the filing of a resolution but instead seek to engage the company in dialogue first. Where that dialogue comes to an impasse, or where the company refuses to engage, we file a resolution. As a result, we do not find ourselves filing many resolutions in a given year in large part because companies have become quite responsive to our engagement, thus making the need for filing a resolution moot.

LEA 21	Voluntary	Public	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	<p>Executive Remuneration</p> <p><input checked="" type="checkbox"/> Executive Remuneration</p> <p><input type="checkbox"/> Climate Change</p> <p><input type="checkbox"/> Human rights</p> <p><input type="checkbox"/> Company leadership issues</p> <p><input type="checkbox"/> Pollution</p> <p><input type="checkbox"/> General ESG</p> <p><input type="checkbox"/> Diversity</p> <p><input type="checkbox"/> Shareholder rights</p> <p><input type="checkbox"/> Health and Safety</p> <p><input type="checkbox"/> Sustainability reporting</p> <p><input type="checkbox"/> Water risks</p> <p><input type="checkbox"/> Labour practices and supply chain management</p> <p><input type="checkbox"/> Anti-bribery and corruption</p> <p><input type="checkbox"/> Deforestation</p> <p><input type="checkbox"/> Aggressive tax planning</p> <p><input type="checkbox"/> Cyber security</p> <p><input type="checkbox"/> Political spending / lobbying</p> <p><input type="checkbox"/> Other governance</p> <p><input type="checkbox"/> Plastics</p> <p><input type="checkbox"/> Other</p>
Conducted by	<p><input checked="" type="checkbox"/> Individual/Internal</p> <p><input type="checkbox"/> Service provider</p>
Objectives	<p>Excessive and Inequitable Compensation</p> <p>In evaluating executive compensation, we look for:</p> <ul style="list-style-type: none"> • a quantum of pay that is enough to retain and motivate talented executives of high integrity, but is not excessive or inequitable; • clear linkage of pay to performance against the company's strategic objectives based on financial, environmental and social metrics of long-term value; • good structure and disclosure that allows shareholders to make informed decisions on pay and allows stakeholders to understand the board's compensation decision-making process; • adoption of generally-accepted compensation good governance practices. <p>To address excessive executive compensation in North American markets, our guidelines include a cap on the level of compensation that we can support, tied to median household income in the market.</p>
Scope and Process	<p>Details of the excessive compensation guideline can be found on our website: https://www.neiinvestments.com/pages/responsible-investing/esg-difference/proxy-voting/</p> <p>If CEO total compensation falls in the quantum range of concern, in principle we will vote against the compensation package unless we find evidence of internal equitable compensation practices intended to ensure that employees across the whole company enjoy excellent pay and</p>

	<p>conditions. Equitable compensation practices could include efforts by the compensation committee to tie executive pay to pay across the broader workforce, such as the use of various types of vertical metrics in setting compensation.</p> <p>If CEO total compensation exceeds the quantum range of concern, we will vote against the compensation package. We will also vote against the incumbent members of the compensation committee if there are no equitable compensation practices in place. We used the excessive compensation rationale to vote against pay packages and/or directors at close to 50 companies in 2019.</p> <p>Several Canadian companies have adopted vertical compensation metrics in response to our engagement.</p>
Outcomes	<p><input checked="" type="checkbox"/> Company changed practice</p> <p><input type="checkbox"/> Company committed to change</p> <p><input type="checkbox"/> Disclosure / report published</p> <p><input type="checkbox"/> Divestment</p> <p><input type="checkbox"/> Failed/no outcome</p> <p><input type="checkbox"/> Increased understanding / information</p> <p><input type="checkbox"/> Invested in company</p> <p><input type="checkbox"/> Ongoing</p> <p><input type="checkbox"/> Voting</p> <p><input type="checkbox"/> Other</p>

☒ Add Example 2

ESG Topic	<p>Diversity</p> <p><input type="checkbox"/> Executive Remuneration</p> <p><input type="checkbox"/> Climate Change</p> <p><input type="checkbox"/> Human rights</p> <p><input type="checkbox"/> Company leadership issues</p> <p><input type="checkbox"/> Pollution</p> <p><input type="checkbox"/> General ESG</p> <p><input checked="" type="checkbox"/> Diversity</p> <p><input type="checkbox"/> Shareholder rights</p> <p><input type="checkbox"/> Health and Safety</p> <p><input type="checkbox"/> Sustainability reporting</p> <p><input type="checkbox"/> Water risks</p> <p><input type="checkbox"/> Labour practices and supply chain management</p> <p><input type="checkbox"/> Anti-bribery and corruption</p> <p><input type="checkbox"/> Deforestation</p> <p><input type="checkbox"/> Aggressive tax planning</p> <p><input type="checkbox"/> Cyber security</p> <p><input type="checkbox"/> Political spending / lobbying</p> <p><input type="checkbox"/> Other governance</p> <p><input type="checkbox"/> Plastics</p> <p><input type="checkbox"/> Other</p>
Conducted by	<p><input checked="" type="checkbox"/> Individual/Internal</p> <p><input type="checkbox"/> Service provider</p>
Objectives	<p>Enhancing Board Diversity</p> <p>We believe that improved representation of women and minorities on the boards of listed companies is both in the interests of corporate performance and a matter of social justice. Our objective is that all companies in our holdings should have boards that are diverse from both an identity perspective and in terms of expertise to oversee the full range of material issues facing the company, including ESG issues. Specifically, we wish to see companies nominate or at least set targets for at least 30% each of female and male nominees to the board.</p>
Scope and Process	<p>We have long voted against nominating committee members at Canadian companies where there is no gender diversity on the board, and for the past four years we have prioritized proxy feedback to these companies, sharing detailed perspectives with the boards on good practices in board diversity. Among large-cap Canadian companies in our holdings, in 2018 so few companies remained with no women on the board that for 2019 we have raised our expectations for board diversity at these companies: we now expect them to nominate at least two women to the board.</p> <p>A number of the companies we have engaged on the topic of diversity have improved their performance and either nominated women to the board or revised their diversity policy to include targets.</p>
Outcomes	<p><input checked="" type="checkbox"/> Company changed practice</p>

	<input type="checkbox"/> Company committed to change <input type="checkbox"/> Disclosure / report published <input type="checkbox"/> Divestment <input type="checkbox"/> Failed/no outcome <input type="checkbox"/> Increased understanding / information <input type="checkbox"/> Invested in company <input type="checkbox"/> Ongoing <input type="checkbox"/> Voting <input type="checkbox"/> Other
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☒ Add Example 3

ESG Topic	<p>Human rights, Pollution, Health and Safety, Water risks, Labour practices and supply chain management, Anti-bribery and corruption, Deforestation</p> <p><input type="checkbox"/> Executive Remuneration</p> <p><input type="checkbox"/> Climate Change</p> <p><input checked="" type="checkbox"/> Human rights</p> <p><input type="checkbox"/> Company leadership issues</p> <p><input checked="" type="checkbox"/> Pollution</p> <p><input type="checkbox"/> General ESG</p> <p><input type="checkbox"/> Diversity</p> <p><input type="checkbox"/> Shareholder rights</p> <p><input checked="" type="checkbox"/> Health and Safety</p> <p><input type="checkbox"/> Sustainability reporting</p> <p><input checked="" type="checkbox"/> Water risks</p> <p><input checked="" type="checkbox"/> Labour practices and supply chain management</p> <p><input checked="" type="checkbox"/> Anti-bribery and corruption</p> <p><input checked="" type="checkbox"/> Deforestation</p> <p><input type="checkbox"/> Aggressive tax planning</p> <p><input type="checkbox"/> Cyber security</p> <p><input type="checkbox"/> Political spending / lobbying</p> <p><input type="checkbox"/> Other governance</p> <p><input type="checkbox"/> Plastics</p> <p><input type="checkbox"/> Other</p>
Conducted by	<p><input checked="" type="checkbox"/> Individual/Internal</p> <p><input type="checkbox"/> Service provider</p>
Objectives	<p>OECD Due Diligence</p> <p>We draw on established norms to define our approach to responsible investment, including the UN Guiding Principles on Business and Human Rights and the OECD Guidelines, a corporate responsibility standard endorsed by the Government of Canada.</p> <p>We have been working to integrate the OECD Guidelines on Responsible Business Conduct for Institutional Investors guidance to our practices, including proxy voting. The guidance calls on institutional investors to undertake due diligence and exercise leverage to prevent or mitigate adverse impacts by investee companies in relation to human rights and labour rights, the environment and corruption.</p>
Scope and Process	<p>We withhold or vote against a director nominee who serves as the incumbent chair of the committee responsible for corporate responsibility issues at a company that has failed to address a significant ESG concern and has not responded to engagement. (Where no such committee exists, we may withhold from the chair of the board.)</p> <p>We may withhold or vote against the entire board if the board has failed to address very significant environmental or social concerns that pose material risk to the value of the company.</p>
Outcomes	<p><input type="checkbox"/> Company changed practice</p> <p><input type="checkbox"/> Company committed to change</p>

	<input type="checkbox"/> Disclosure / report published <input type="checkbox"/> Divestment <input type="checkbox"/> Failed/no outcome <input type="checkbox"/> Increased understanding / information <input type="checkbox"/> Invested in company <input type="checkbox"/> Ongoing <input checked="" type="checkbox"/> Voting <input type="checkbox"/> Other
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☒ Add Example 4

ESG Topic	<p>Climate Change</p> <p><input type="checkbox"/> Executive Remuneration</p> <p><input checked="" type="checkbox"/> Climate Change</p> <p><input type="checkbox"/> Human rights</p> <p><input type="checkbox"/> Company leadership issues</p> <p><input type="checkbox"/> Pollution</p> <p><input type="checkbox"/> General ESG</p> <p><input type="checkbox"/> Diversity</p> <p><input type="checkbox"/> Shareholder rights</p> <p><input type="checkbox"/> Health and Safety</p> <p><input type="checkbox"/> Sustainability reporting</p> <p><input type="checkbox"/> Water risks</p> <p><input type="checkbox"/> Labour practices and supply chain management</p> <p><input type="checkbox"/> Anti-bribery and corruption</p> <p><input type="checkbox"/> Deforestation</p> <p><input type="checkbox"/> Aggressive tax planning</p> <p><input type="checkbox"/> Cyber security</p> <p><input type="checkbox"/> Political spending / lobbying</p> <p><input type="checkbox"/> Other governance</p> <p><input type="checkbox"/> Plastics</p> <p><input type="checkbox"/> Other</p>
Conducted by	<p><input checked="" type="checkbox"/> Individual/Internal</p> <p><input type="checkbox"/> Service provider</p>
Objectives	<p>Considered Voting on Climate Proposals</p> <p>We support shareholder proposals on environmental and social issues that we believe to be in the best long-term interests of stakeholders, including shareholders and the corporation. The range of topics that may be raised through environmental and social shareholder proposals is so wide and so fast-changing that it is no longer practical to set out specific guidelines in this area. We vote these proposals on a case-by-case basis, looking for direction to:</p> <ul style="list-style-type: none"> • our basic principles for assessing shareholder proposals (see LEA 20.6 for details); • our ESG Program criteria and corporate engagement goals and objectives; • our commitments to support specific conventions, norms, standards and initiative. <p>In relation to climate-related shareholder proposals, sources of direction include the recommendations of the Taskforce on Climate-related Financial Disclosure, the Climate Action 100+ collaborative engagement and ESG program objectives relating to a socially-just, well-managed transition to a low-carbon economy.</p>
Scope and Process	<p>We vote climate-related shareholder proposals on a case-by-case basis, considering each proposal on its merits. Over the past three years we have voted for around 75% of climate change proposals, abstained/withheld around 15% and voted against about 10% where we felt the proposal was moot or poorly-targeted or we did not agree with the proponent's proposed approach to tackling climate risk at the company.</p>

Outcomes	<input type="checkbox"/> Company changed practice <input type="checkbox"/> Company committed to change <input type="checkbox"/> Disclosure / report published <input type="checkbox"/> Divestment <input type="checkbox"/> Failed/no outcome <input type="checkbox"/> Increased understanding / information <input type="checkbox"/> Invested in company <input type="checkbox"/> Ongoing <input checked="" type="checkbox"/> Voting <input type="checkbox"/> Other
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- ☐ Add Example 5
- ☐ Add Example 6
- ☐ Add Example 7
- ☐ Add Example 8
- ☐ Add Example 9
- ☐ Add Example 10

NEI Investments

Reported Information

Public version

Confidence building measures

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.

Confidence building measures

CM1 01	Mandatory	Public	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:

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

CM1 02	Mandatory	Public	Descriptive	General
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CM1 02.1 We undertook third party assurance on last year's PRI Transparency Report

- ☐ Whole PRI Transparency Report was assured last year
- ☐ Selected data was assured in last year's PRI Transparency Report
- ☒ We did not assure last year's PRI Transparency report
- ☐ None of the above, we were in our preparation year and did not report last year.

CM1 03	Mandatory	Public	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:

- ☐ We adhere to an RI certification or labelling scheme
- ☐ We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report
- ☐ ESG audit of holdings
- ☒ Other, specify

We regularly audit the companies in portfolios managed by sub-advisors to ensure that they are adhering to our ESG guidelines and expectations.
- ☐ None of the above

CM1 04	Mandatory	Public	Descriptive	General
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CM1 04.1

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

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

CM1 07**Mandatory****Public****Descriptive****General****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

Who has conducted the verification

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