



| LEA 02   | Discipline: Mandatory   | Principle: PRI 1, 2, 3  |
|--|---|---|
| <p><b>Reason for interaction</b></p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> To support investment decisionmaking in a company's material ESG issues</li> <li><input checked="" type="checkbox"/> To influence corporate practice or identify the need for additional or enhanced information</li> <li><input checked="" type="checkbox"/> To engage internal ESG advisors</li> <li><input type="checkbox"/> Other: specify</li> <li><input type="checkbox"/> We do not engage in internal staff</li> </ul> | <p><b>Type of engagement</b></p> <p>Individual/ internal staff engagements</p>  | <p><b>Reason for interaction</b></p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> To support investment decisionmaking in a company's material ESG issues</li> <li><input checked="" type="checkbox"/> To influence corporate practice or identify the need for additional or enhanced information</li> <li><input checked="" type="checkbox"/> To engage internal ESG advisors</li> <li><input type="checkbox"/> Other: specify</li> <li><input type="checkbox"/> We do not engage in collaborative engagements</li> </ul> |
| <p><b>Type of engagement</b></p> <p>Collaborative engagements</p>  | <p><b>Reason for interaction</b></p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> To support investment decisionmaking in a company's material ESG issues</li> <li><input checked="" type="checkbox"/> To influence corporate practice or identify the need for additional or enhanced information</li> <li><input checked="" type="checkbox"/> To engage internal ESG advisors</li> <li><input type="checkbox"/> Other: specify</li> <li><input type="checkbox"/> We do not engage in collaborative engagements</li> </ul> | <p><b>Reason for interaction</b></p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> To support investment decisionmaking in a company's material ESG issues</li> <li><input checked="" type="checkbox"/> To influence corporate practice or identify the need for additional or enhanced information</li> <li><input checked="" type="checkbox"/> To engage internal ESG advisors</li> <li><input type="checkbox"/> Other: specify</li> <li><input type="checkbox"/> We do not engage in collaborative engagements</li> </ul> |
| <p><b>Type of engagement</b></p> <p>Service provider engagements</p>   | <p><b>Reason for interaction</b></p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> To support investment decisionmaking in a company's material ESG issues</li> <li><input checked="" type="checkbox"/> To influence corporate practice or identify the need for additional or enhanced information</li> <li><input checked="" type="checkbox"/> To engage internal ESG advisors</li> <li><input type="checkbox"/> Other: specify</li> <li><input type="checkbox"/> We do not engage in collaborative engagements</li> </ul> | <p><b>Reason for interaction</b></p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> To support investment decisionmaking in a company's material ESG issues</li> <li><input checked="" type="checkbox"/> To influence corporate practice or identify the need for additional or enhanced information</li> <li><input checked="" type="checkbox"/> To engage internal ESG advisors</li> <li><input type="checkbox"/> Other: specify</li> <li><input type="checkbox"/> We do not engage in collaborative engagements</li> </ul> |

# RI TRANSPARENCY REPORT

## 2020

Tradeka Corporation

## 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   | ✓      | Private                      |           |   |   |   |   |   | ✓       |
| OO 08                   | Segregated mandates or pooled funds  | ✓      | Private                      |           |   |   |   |   |   | ✓       |
| OO 09                   | Breakdown of AUM by market   | ✓      | Public                       |           |   |   |   |   |   | ✓       |
| OO 10                   | Active ownership practices for listed assets                                 | ✓      | Public                       |           |   |   |   |   |   | ✓       |
| OO 11                   | ESG incorporation practices for all assets                                   | ✓      | Public                       |           |   |   |   |   |   | ✓       |
| OO 12                   | Modules and sections required to complete                                    | ✓      | Public                       |           |   |   |   |   |   | ✓       |
| OO LE 01                | Breakdown of listed equity investments by passive and active strategies      | ✓      | Private                      |           |   |   |   |   |   | ✓       |
| 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       | ✓      | Private                      |           |   |   |   |   |   | ✓       |
| 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                          | ✓      | Public                       |           |   |   |   |   |   | ✓       |
| 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  | ✓      | Private                      |           |   |   |   |   |   | ✓       |
| OO PR 02                | Breakdown of property assets by management                                   | ✓      | Private                      |           |   |   |   |   |   | ✓       |
| OO PR 03                | Largest property types   | ✓      | Private                      |           |   |   |   |   |   | ✓       |
| 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                  | ✓      | Private    |           |   |   |   |   |   | ✓       |
| SG 05                     | RI goals and objectives  | ✓      | Public     |           |   |   |   |   |   | ✓       |
| SG 06                     | Main goals/objectives this year                                    | ✓      | Private    |           |   |   |   |   |   | ✓       |
| SG 07                     | RI roles and responsibilities                                      | ✓      | Public     |           |   |   |   |   |   | ✓       |
| SG 07 CC                  | Climate-issues roles and responsibilities                          | ✓      | Private    |           |   |   |   |   |   | ✓       |
| SG 08                     | RI in performance management, reward and/or personal development   | ✓      | Private    |           |   |   |   |   |   | ✓       |
| SG 09                     | Collaborative organisations / initiatives                          | ✓      | Public     |           |   |   | ✓ | ✓ |   |         |
| SG 09.2                   | Assets managed by PRI signatories                                  | ✓      | Private    | ✓         |   |   |   |   |   |         |
| SG 10                     | Promoting RI independently   | ✓      | Public     |           |   |   | ✓ |   |   |         |
| SG 11                     | Dialogue with public policy makers or standard setters             | ✓      | Private    |           |   |   | ✓ | ✓ | ✓ |         |
| SG 12                     | Role of investment consultants/fiduciary managers                  | ✓      | Public     |           |   |   | ✓ |   |   |         |
| SG 13                     | ESG issues in strategic asset allocation                           | ✓      | Public     | ✓         |   |   |   |   |   |         |
| SG 13 CC                  |  | ⚠      | n/a        |           |   |   |   |   |   | ✓       |
| SG 14                     | Long term investment risks and opportunity                         | ✓      | Private    | ✓         |   |   |   |   |   |         |
| SG 14 CC                  |  | ✓      | Private    |           |   |   |   |   |   | ✓       |
| SG 15                     | Allocation of assets to environmental and social themed areas      | ✓      | Private    | ✓         |   |   |   |   |   |         |
| SG 16                     | ESG issues for internally managed assets not reported in framework | ✓      | Public     |           |   |   |   |   |   | ✓       |
| SG 17                     | ESG issues for externally managed assets not reported in framework | ✓      | Public     |           |   |   |   |   |   | ✓       |
| SG 18                     | Innovative features of approach to RI                              | ✓      | Private    |           |   |   |   |   |   | ✓       |
| SG 19                     | Communication  | ✓      | Public     |           | ✓ |   |   |   | ✓ |         |
| SG End                    | Module confirmation page   | ✓      | -          |           |   |   |   |   |   |         |

| Indirect – 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) | ✓      | Public     |           | ✓ |   |   |   |   |         |
| 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)                                  | ✓      | Public     | ✓         |   |   |   |   |   |         |
| SAM 07   | Percentage of (proxy) votes  | ✓      | n/a        |           | ✓ |   |   |   |   |         |
| SAM 08   | Percentage of externally managed assets managed by PRI signatories                           | ✓      | Private    | ✓         |   |   |   |   |   |         |
| SAM 09   | Examples of ESG issues in selection, appointment and monitoring processes                    | ✓      | Public     | ✓         |   |   |   |   |   | ✓       |
| SAM End  | Module confirmation page   | ✓      | -          |           |   |   |   |   |   |         |

| 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              | 🔒      | n/a        |           |   |   |   |   |   | ✓       |
| CM1 01 End                   | Module confirmation page           | ✓      | -          |           |   |   |   |   |   |         |

# Tradeka Corporation

## Reported Information

### Public version

### Organisational Overview

## 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.

## Basic information

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

**OO 01.1** Select the type that best describes your organisation or the services you provide.

- Non-corporate pension or superannuation or retirement or provident fund or plan
- Corporate pension or superannuation or retirement or provident fund or plan
- Insurance company
- Foundation
- Endowment
- Development finance institution
- Reserve - sovereign or government controlled fund
- Family office
- Other, specify

Co-operative owned by ca. 225.000 Finnish consumers

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

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

Finland

**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

3379

|       |           |        |             |         |
|-------|-----------|--------|-------------|---------|
| 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 04.1** 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     |           |          | 563      | 000       | 000      |
| Currency      | EUR       |          |          |           |          |
| Assets in USD |           |          | 620      | 595       | 630      |

Not applicable as we are in the fund-raising process

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

- as percentage breakdown
- as broad ranges

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

|         |   |
|---------|---|
| 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 09** **Mandatory** **Public** **Peering** **General**

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

|      |                   |
|------|-------------------|
|      | Developed Markets |
| 84.3 |                   |
|      | Emerging Markets  |
| 12.9 |                   |
|      | Frontier Markets  |
| 2.8  |                   |
|      | Other Markets     |
| 0    |                   |
|      | Total 100%        |
| 100% |                   |

**Asset class implementation gateway indicators**

**OO 10** **Mandatory** **Public** **Gateway** **General**

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

Listed equity – engagement

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

Listed equity – voting

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

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

- 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

OO 11.1

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

Listed equity

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

Fixed income - corporate (non-financial)

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

Property

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

Cash

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

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.

| Asset class                              | ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes  |
|--|--|
| Listed equity                            | <p data-bbox="571 342 1474 423">Listed equity - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p data-bbox="571 439 1294 465"><input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p data-bbox="571 481 1331 508"><input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process</p> <p data-bbox="571 524 1310 551"><input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p data-bbox="571 566 948 593"><input type="checkbox"/> We do not do ESG incorporation</p>                                     |
| Fixed income - corporate (financial)     | <p data-bbox="571 658 1474 739">Fixed income - corporate (financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p data-bbox="571 777 1294 804"><input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p data-bbox="571 819 1331 846"><input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process</p> <p data-bbox="571 862 1310 889"><input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p data-bbox="571 904 948 931"><input type="checkbox"/> We do not do ESG incorporation</p>              |
| Fixed income - corporate (non-financial) | <p data-bbox="571 999 1474 1079">Fixed income - corporate (non-financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p data-bbox="571 1117 1294 1144"><input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p data-bbox="571 1160 1331 1187"><input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process</p> <p data-bbox="571 1202 1310 1229"><input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p data-bbox="571 1245 948 1272"><input type="checkbox"/> We do not do ESG incorporation</p> |
| Private equity                           | <p data-bbox="571 1339 1474 1420">Private equity - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p data-bbox="571 1435 1294 1462"><input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p data-bbox="571 1478 1331 1505"><input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process</p> <p data-bbox="571 1520 1310 1547"><input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p data-bbox="571 1563 948 1590"><input type="checkbox"/> We do not do ESG incorporation</p>                          |
| Property                                 | <p data-bbox="571 1655 1474 1736">Property - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p data-bbox="571 1751 1294 1778"><input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p data-bbox="571 1794 1331 1821"><input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process</p> <p data-bbox="571 1836 1310 1863"><input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p data-bbox="571 1879 948 1906"><input type="checkbox"/> We do not do ESG incorporation</p>                                |
| Infrastructure                           |  |

|                          |   |
|--------------------------|---|
|                          | <p>Infrastructure - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p><input type="checkbox"/> We do not do ESG incorporation</p>           |
| Forestry                 | <p>Forestry - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p><input type="checkbox"/> We do not do ESG incorporation</p>                 |
| Money market instruments | <p>Money market instruments - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p><input type="checkbox"/> We do not do ESG incorporation</p> |
| Other (2)                | <p>Other (2) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p><input type="checkbox"/> We do not do ESG incorporation</p>                |

**OO 11.4**

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

Before making an investment decision we assess whether the manager conforms to ESG implementation in the process of executing underlying investments. As such it also applies to the external manager appointment. We carry out ongoing and regular monitoring of managers' progress in ESG consideration.

|              |                  |               |                |                |
|--------------|------------------|---------------|----------------|----------------|
| <b>OO 12</b> | <b>Mandatory</b> | <b>Public</b> | <b>Gateway</b> | <b>General</b> |
|--------------|------------------|---------------|----------------|----------------|

**OO 12.1**

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

## Core modules

- Organisational Overview
- Strategy and Governance

## RI implementation directly or via service providers

### Direct - Listed Equity incorporation

- Listed Equity incorporation

### Direct - Fixed Income

- Fixed income - Corporate (non-financial)

### Direct - Other asset classes with dedicated modules

- Property

## RI implementation via external managers

### Indirect - Selection, Appointment and Monitoring of External Managers

- Listed Equities
- Fixed income - Corporate (financial)
- Fixed income - Corporate (non-financial)
- Private Equity
- Property
- Infrastructure

## Closing module

- Closing module

## Peering questions

# Tradeka Corporation

## Reported Information

### Public version

### Strategy and Governance

## 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.



## Investment policy

SG 01

Mandatory

Public

Core Assessed

General

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

**SG 01.1**

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

Yes

**SG 01.2**

Indicate the components/types and coverage of your policy.

Select all that apply

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

**SG 01.3**

Indicate if the investment policy covers any of the following

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

**SG 01.4**

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

The investment portfolio is diversified into various asset classes by investing in investment products of various asset managers, mainly funds. The long-term strategic allocation by asset class is 35% equities, 25% fixed income investments and 40% real estate and other long-term investments.

The long-term real return expectation is 4% and the investments made must, by type of investment, be competitive in relation to similar investments made by other institutional investors.

Tradeka requires its asset managers to take into account corporate responsibility considerations in accordance with the UN Principles for Responsible Investment. Tradeka participates in the work of FINSIF, the Finnish Association for Responsible Investment. Tradeka does not invest in tax havens as defined by the OECD.

No

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

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

**SG 02.1**

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

- Policy setting out your overall approach

URL/Attachment

- URL

URL

<https://www.tradeka.fi/vuosikertomukset>

- Attachment (will be made public)
- Asset class-specific RI guidelines
- Screening / exclusions policy
- We do not publicly disclose our investment policy documents

**SG 02.2**

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

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

URL/Attachment

- URL

URL

<https://www.tradeka.fi/vastuullisuus/vastuullinen-sijoittaminen>

- Attachment
- Your investment objectives that take ESG factors/real economy influence into account
- Time horizon of your investment
- Governance structure of organisational ESG responsibilities
- ESG incorporation approaches
- Reporting
- We do not publicly disclose any investment policy components

|              |                  |               |                      |                |
|--------------|------------------|---------------|----------------------|----------------|
| <b>SG 03</b> | <b>Mandatory</b> | <b>Public</b> | <b>Core Assessed</b> | <b>General</b> |
|--------------|------------------|---------------|----------------------|----------------|

**SG 03.1**

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

- Yes
- No

**SG 03.3**

Additional information. [Optional]

If we find a potential conflict of interest it might not be a suitable investment opportunity for us.

**Objectives and strategies**

|              |                  |               |                              |                |
|--------------|------------------|---------------|------------------------------|----------------|
| <b>SG 05</b> | <b>Mandatory</b> | <b>Public</b> | <b>Gateway/Core Assessed</b> | <b>General</b> |
|--------------|------------------|---------------|------------------------------|----------------|

**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]

We monitor regularly the ESG procedures of our external managers. We review our RI policy annually and update it if necessary.

## Governance and human resources

**SG 07****Mandatory****Public****Core Assessed****General****SG 07.1**

Indicate the internal and/or external roles used by your organisation, and indicate for each whether they have oversight and/or implementation responsibilities for responsible investment.

### Roles

- 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
- Portfolio managers
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Investment analysts
- Dedicated responsible investment staff
- Investor relations
- Other role, specify (1)
- Other role, specify (2)
- External managers or service providers

**SG 07.2**

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

RI matters are reported to the board

**SG 07.3**

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

Number

2

**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 have participated in all PRI in Person events since 2009.

- 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
- CDP Forests
- CDP Water
- CFA Institute Centre for Financial Market Integrity
- Climate Action 100+
- Code for Responsible Investment in SA (CRISA)
- Council of Institutional Investors (CII)
- Eumedion
- Extractive Industries Transparency Initiative (EITI)
- ESG Research Australia
- Invest Europe Responsible Investment Roundtable
- Global Investors Governance Network (GIGN)
- Global Impact Investing Network (GIIN)
- Global Real Estate Sustainability Benchmark (GRESB)
- Green Bond Principles
- HKVCA: ESG Committee
- Institutional Investors Group on Climate Change (IIGCC)
- Interfaith Center on Corporate Responsibility (ICCR)
- International Corporate Governance Network (ICGN)
- Investor Group on Climate Change, Australia/New Zealand (IGCC)
- International Integrated Reporting Council (IIRC)
- Investor Network on Climate Risk (INCR)/CERES
- Local Authority Pension Fund Forum
- Principles for Financial Action in the 21st Century
- Principles for Sustainable Insurance
- Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify  
**Founding member of FINSIF**

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 have participated in most of the FINSIF events and Tradeka was one of the founders of FINSIF.

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

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

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

- Yes

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

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

Description

We encourage our investment managers to communicate RI matters transparently.

#### 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

RI matters are brought forward when needed e.g. in investment committee gatherings.

#### Frequency of contribution

- Quarterly or more frequently
  - Biannually
  - Annually
  - Less frequently than annually
  - Ad hoc
  - Other
- Wrote and published in-house research papers on responsible investment
- Encouraged the adoption of the PRI

#### Description

Encouraged the adoption of the PRI

#### Frequency of contribution

- Quarterly or more frequently
  - Biannually
  - Annually
  - Less frequently than annually
  - Ad hoc
  - Other
- Responded to RI related consultations by non-governmental organisations (OECD, FSB etc.)
- Wrote and published articles on responsible investment in the media
- A member of PRI advisory committees/ working groups, specify
- On the Board of, or officially advising, other RI organisations (e.g. local SIFs)
- Other, specify
- No



## Outsourcing to fiduciary managers and investment consultants

|       |           |        |               |       |
|-------|-----------|--------|---------------|-------|
| SG 12 | Mandatory | Public | Core Assessed | PRI 4 |
|-------|-----------|--------|---------------|-------|

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

|         |   |
|---------|---|
| SG 12.1 | Indicate whether your organisation uses investment consultants. |
|---------|---|

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

|         |  |
|---------|--|
| SG 12.5 | Indicate whether your organisation considers any of the following responsible investment factors in the monitoring of fiduciary managers |
|---------|--|

- Including responsible investment as a standard agenda item at performance review meetings
- Discussing whether the fiduciary manager has acted in accordance with your organisation's overall investment beliefs/ strategy/ policy on responsible investment and ESG factors
- Reviewing the fiduciary manager's PRI Transparency or Assessment reports
- Reviewing the fiduciary manager's responsible investment reporting (excluding PRI generated reports)
- Reviewing ESG characteristics/factors used by the fiduciary manager in portfolio construction
- Reviewing the fiduciary manager's incorporation approaches of ESG through-out asset classes
- Reviewing the impact of ESG factors on financial performance
- Encouraging your fiduciary managers to consider joining responsible investment initiatives/organisations or participate in educational or collaborative projects with other investors
- Including responsible investment criteria as a formal component of overall manager performance evaluation
- Reviewing the fiduciary manager's ESG incorporation in external managers' selection, appointment, monitoring
- Reviewing how ESG materiality is defined by the fiduciary manager
- Other general aspects of your monitoring; specify
- We do not consider responsible investment in the monitoring processes for fiduciary managers.

## ESG issues in asset allocation

|       |           |        |             |       |
|-------|-----------|--------|-------------|-------|
| SG 13 | Mandatory | Public | Descriptive | PRI 1 |
|-------|-----------|--------|-------------|-------|

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

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

## Asset class implementation not reported in other modules

|       |           |        |             |         |
|-------|-----------|--------|-------------|---------|
| SG 16 | Mandatory | Public | Descriptive | General |
|-------|-----------|--------|-------------|---------|

**SG 16.1**

Describe how you address ESG issues for internally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.

| <b>Asset Class</b>                       | <b>Describe what processes are in place and the outputs or outcomes achieved</b>   |
|--|--|
| Listed equities - ESG incorporation      | We are planning to develop a framework that would allow us to assess direct internally managed investments from an ESG perspective. Sustainability for direct equity investments are mainly assessed through information provided in annual reports.   |
| Fixed income - Corporate (non-financial) | We are planning to develop a framework that would allow us to assess direct internally managed investments from an ESG perspective. The ESG profile of the company is assessed when making the investment decision. For example no investments have been made to 'loan sharking' businesses due to questionable social impact. |
| Property                                 | Managers are asked to elaborate on how ESG issues are covered  |
| Cash                                     | Deposits are held in banks with validated processes to monitor ESG issues. Specific emphasis is applied to AML procedures.   |

**SG 17****Mandatory****Public****Descriptive****General****SG 17.1**

Describe how you address ESG issues for externally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.

| Asset Class  | Describe what processes are in place and the outputs or outcomes achieved  |
|--|--|
| Fixed income - Corporate (financial)                     | Managers are asked to elaborate on how ESG issues are covered and supporting documentation is required. We execute regular monitoring of our investment managers from an ESG perspective. PRI transparency and assessment reports are utilised and own questionnaires are used to map out the situation. |
| Private equity   | Managers are asked to elaborate on how ESG issues are covered and supporting documentation is required.  |
| Infrastructure   | Managers are asked to elaborate on how ESG issues are covered and supporting documentation is required.  |
| Forestry   | Managers are asked to elaborate on how ESG issues are covered and supporting documentation is required   |
| Money market instruments                                 | Managers are asked to elaborate on how ESG issues are covered and supporting documentation is required. We execute regular monitoring of our investment managers from an ESG perspective. PRI transparency and assessment reports are utilised and own questionnaires are used to map out the situation. |
| Other (2) [as defined in Organisational Overview module] | Managers are asked to elaborate on how ESG issues are covered and supporting documentation is required   |

## Communication

|       |           |        |               |          |
|-------|-----------|--------|---------------|----------|
| SG 19 | Mandatory | Public | Core Assessed | PRI 2, 6 |
|-------|-----------|--------|---------------|----------|

### SG 19.1

Indicate whether your organisation typically discloses asset class specific information proactively. Select the frequency of the disclosure to clients/beneficiaries and the public, and provide a URL to the public information.

#### Selection, Appointment and Monitoring

#### Do you disclose?

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

The information disclosed to clients/beneficiaries is the same

Yes

No

|   |  |
|---|--|
| <b>Disclosure to public and URL</b>   |  |
| <b>Disclosure to public and URL</b>   |  |
| <input checked="" type="checkbox"/> How responsible investment considerations are included in manager selection, appointment and monitoring processes |  |
| <input type="checkbox"/> Details of the responsible investment activities carried out by managers on your behalf                                      |  |
| <input type="checkbox"/> E, S and/or G impacts and outcomes that have resulted from your managers' investments and/or active ownership                |  |
| <input type="checkbox"/> Other  |  |
| <b>Frequency</b>  |  |
| <input type="checkbox"/> Quarterly or more frequently   |  |
| <input type="checkbox"/> Biannually   |  |
| <input type="checkbox"/> Annually   |  |
| <input type="checkbox"/> Less frequently than annually  |  |
| <input checked="" type="checkbox"/> Ad-hoc/when requested   |  |
| <b>URL</b>  |  |
| <a href="https://www.tradeka.fi/vastuullisuus/vastuullinen-sijoittaminen">https://www.tradeka.fi/vastuullisuus/vastuullinen-sijoittaminen</a>         |  |

Tradeka Corporation

Reported Information

Public version

Indirect – Manager Selection, Appointment and Monitoring

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## Listed Equity and Fixed Income Strategies

|               |                  |               |                |              |
|---------------|------------------|---------------|----------------|--------------|
| <b>SAM 01</b> | <b>Mandatory</b> | <b>Public</b> | <b>Gateway</b> | <b>PRI 1</b> |
|---------------|------------------|---------------|----------------|--------------|

**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 - Corporate (non-financial)      |
|------------------------------|-------------------------------------|--|--|-------------------------------------|
| Screening                    | <input checked="" type="checkbox"/> |  |  | <input checked="" type="checkbox"/> |
| Thematic                     | <input type="checkbox"/>            |  |  | <input type="checkbox"/>            |
| Integration                  | <input checked="" type="checkbox"/> |  |  | <input checked="" type="checkbox"/> |
| None of the above            | <input type="checkbox"/>            |  |  | <input type="checkbox"/>            |

### Passive investment strategies

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

## Selection

|               |                  |               |                      |              |
|---------------|------------------|---------------|----------------------|--------------|
| <b>SAM 02</b> | <b>Mandatory</b> | <b>Public</b> | <b>Core Assessed</b> | <b>PRI 1</b> |
|---------------|------------------|---------------|----------------------|--------------|

**SAM 02.1** Indicate what RI-related information your organisation typically covers in the majority of selection documentation for your external managers

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

**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 - Corporate (non-financial)      |  |  | Property                            |
|---|-------------------------------------|--|--|-------------------------------------|--|--|-------------------------------------|
| Assess the time horizon of the investment manager's offering vs. your/beneficiaries' requirements | <input type="checkbox"/>            |  |  | <input type="checkbox"/>            |  |  | <input 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"/> |
| 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"/> |
| Review the manager's firm-level vs. product-level approach to RI                                  | <input type="checkbox"/>            |  |  | <input type="checkbox"/>            |  |  | <input type="checkbox"/>            |
| Assess the ESG definitions to be used   | <input type="checkbox"/>            |  |  | <input type="checkbox"/>            |  |  | <input type="checkbox"/>            |
| Other   | <input type="checkbox"/>            |  |  | <input type="checkbox"/>            |  |  | <input type="checkbox"/>            |
| None of the above   | <input type="checkbox"/>            |  |  | <input type="checkbox"/>            |  |  | <input type="checkbox"/>            |

ESG people/oversight

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

Process/portfolio construction/investment valuation



|   | LE                                  |  | FI - Corporate<br>(non-financial)   |  | Property                            |  |
|---|-------------------------------------|--|-------------------------------------|--|-------------------------------------|--|
| Review the process for ensuring the quality of the ESG data used  | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  | <input 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"/> |  |
| Review and agree the impact of ESG analysis on investment decisions                                       | <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"/> |  |
| Review and agree manager's ESG risk framework   | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  |
| Review and agree ESG risk limits at the portfolio level (portfolio construction) and other ESG objectives | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  |
| Review how ESG materiality is evaluated by the manager  | <input checked="" type="checkbox"/> |  | <input checked="" type="checkbox"/> |  | <input type="checkbox"/>            |  |
| Review process for defining and communicating on ESG incidents  | <input checked="" type="checkbox"/> |  | <input checked="" type="checkbox"/> |  | <input type="checkbox"/>            |  |
| Review and agree ESG reporting frequency and detail   | <input checked="" type="checkbox"/> |  | <input checked="" type="checkbox"/> |  | <input type="checkbox"/>            |  |
| Other, specify  | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  |
| None of the above   | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  |

**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

**SAM 02.4**

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

|                                     | LE                                  |  | FI - Corporate (non-financial)      |  | Property                            |
|-------------------------------------|-------------------------------------|--|-------------------------------------|--|-------------------------------------|
| ESG performance development targets | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  | <input type="checkbox"/>            |
| ESG score                           | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  | <input type="checkbox"/>            |
| ESG weight                          | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  | <input type="checkbox"/>            |
| Real world economy targets          | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  | <input type="checkbox"/>            |
| Other RI considerations             | <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"/>            |

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

When selecting new managers we enquire how ESG related issues are considered in the investment process.

|               |                  |               |                            |              |
|---------------|------------------|---------------|----------------------------|--------------|
| <b>SAM 03</b> | <b>Mandatory</b> | <b>Public</b> | <b>Additional Assessed</b> | <b>PRI 2</b> |
|---------------|------------------|---------------|----------------------------|--------------|

**SAM 03.1**

Indicate how your organisation typically evaluates the manager's active ownership practices in the majority of the manager selection process.

Engagement

|  | LE                                  |  | FI - Corporate (non-financial)      |
|--|-------------------------------------|--|-------------------------------------|
| Review the manager's engagement policy   | <input type="checkbox"/>            |  | <input type="checkbox"/>            |
| Review the manager's engagement process (with examples and outcomes)                     | <input checked="" type="checkbox"/> |  | <input checked="" type="checkbox"/> |
| Ensure whether engagement outcomes feed back into the investment decision-making process | <input type="checkbox"/>            |  | <input type="checkbox"/>            |
| Other engagement issues in your selection process specify                                | <input type="checkbox"/>            |  | <input type="checkbox"/>            |

(Proxy) voting

|   | LE                                  |
|---|-------------------------------------|
| Review the manager's voting policy  | <input checked="" type="checkbox"/> |
| Review the manager's ability to align voting activities with clients' specific voting policies      | <input type="checkbox"/>            |
| Review the manager's process for informing clients about voting decisions                           | <input type="checkbox"/>            |
| Ensure whether voting outcomes feed back into the investment decision-making process                | <input type="checkbox"/>            |
| Review the number of votes cast as a percentage of ballots/AGMs or holdings and available rationale | <input type="checkbox"/>            |
| Other active ownership voting issues in your selection process; specify                             | <input type="checkbox"/>            |

**SAM 03.2**

Describe how you assess if the manager's engagement approach is effective.

- Impact on investment decisions
- Financial impact on target company or asset class
- Impact on ESG profile of company or the portfolio
- Evidence of changes in corporate practices(i.e. ESG policies and implementation activities)
- Other, specify
- None of the above

**SAM 03.3**

Describe how you assess if the manager's voting approach is effective/appropriate

- Impact on investment decisions
- Impact on ESG profile of company or the portfolio
- Evidence of changes in corporate practices(i.e. ESG policies and implementation activities)
- Other, specify
- None of the above

**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

- Sets standard benchmarks or ESG benchmarks
- Defines ESG objectives and/ or ESG related exclusions/restrictions
- Sets incentives and controls linked to the ESG objectives
- Requires reporting on ESG objectives
- Requires the investment manager to adhere to ESG guidelines, regulations, principles or standards
- Other, specify (1)
- Other, specify (2)
- None of the above

**SAM 04.3**

Indicate which of these actions your organisation might take if any of the requirements are not met

- 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

## Monitoring

**SAM 05****Mandatory****Public****Core Assessed****PRI 1****SAM 05.1**

When monitoring managers, indicate which of the following types of responsible investment information your organisation typically reviews and evaluates

|   | LE                                  |  |  | FI - Corporate<br>(non-financial)   |  |  | Property                            |
|---|-------------------------------------|--|--|-------------------------------------|--|--|-------------------------------------|
| ESG objectives linked to investment strategy (with examples)  | <input checked="" type="checkbox"/> |  |  | <input checked="" type="checkbox"/> |  |  | <input 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"/> |
| Compliance with investment restrictions and any controversial investment decisions  | <input type="checkbox"/>            |  |  | <input type="checkbox"/>            |  |  | <input type="checkbox"/>            |
| ESG portfolio characteristics   | <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 type="checkbox"/>            |
| Information on any ESG incidents  | <input checked="" type="checkbox"/> |  |  | <input checked="" type="checkbox"/> |  |  | <input type="checkbox"/>            |
| Metrics on the real economy influence of the investments  | <input type="checkbox"/>            |  |  | <input type="checkbox"/>            |  |  | <input type="checkbox"/>            |
| PRI Transparency Reports  | <input checked="" type="checkbox"/> |  |  | <input checked="" type="checkbox"/> |  |  | <input checked="" type="checkbox"/> |
| PRI Assessment Reports  | <input checked="" type="checkbox"/> |  |  | <input checked="" type="checkbox"/> |  |  | <input checked="" type="checkbox"/> |
| RI-promotion and engagement with the industry to enhance RI implementation  | <input type="checkbox"/>            |  |  | <input type="checkbox"/>            |  |  | <input type="checkbox"/>            |
| Changes to the oversight and responsibilities of ESG implementation   | <input type="checkbox"/>            |  |  | <input type="checkbox"/>            |  |  | <input type="checkbox"/>            |
| Other general RI considerations in investment management agreements; specify  | <input type="checkbox"/>            |  |  | <input type="checkbox"/>            |  |  | <input type="checkbox"/>            |
| None of the above   | <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 - Corporate (non-financial)      |  | Property                            |  |
|-----------------------------------|-------------------------------------|--|-------------------------------------|--|-------------------------------------|--|
| ESG score                         | <input checked="" type="checkbox"/> |  | <input checked="" type="checkbox"/> |  | <input type="checkbox"/>            |  |
| ESG weight                        | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  |
| ESG performance minimum threshold | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  |
| Real world economy targets        | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  | <input type="checkbox"/>            |  |
| Other RI considerations           | <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"/>            |  |

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

We ask our managers to list the concrete actions executed and planned towards enhancement of ESG matters.

|        |           |        |                     |       |
|--------|-----------|--------|---------------------|-------|
| SAM 06 | Mandatory | Public | Additional Assessed | PRI 1 |
|--------|-----------|--------|---------------------|-------|

**SAM 06.1** When monitoring managers, indicate which of the following active ownership information your organisation typically reviews and evaluates from the investment manager in meetings/calls

Engagement

|   | LE                                  | FI - Corporate (non-financial)      |
|---|-------------------------------------|-------------------------------------|
| Report on engagements undertaken (summary with metrics, themes, issues, sectors or similar) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Report on engagement ESG impacts (outcomes, progress made against objectives and examples)  | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Information on any escalation strategy taken after initial unsuccessful dialogue            | <input type="checkbox"/>            | <input type="checkbox"/>            |
| Alignment with any eventual engagement programme done internally                            | <input type="checkbox"/>            | <input type="checkbox"/>            |
| Information on the engagement activities' impact on investment decisions                    | <input type="checkbox"/>            | <input type="checkbox"/>            |
| Other RI considerations relating to engagement in investment management agreements; specify | <input type="checkbox"/>            | <input type="checkbox"/>            |
| None of the above   | <input type="checkbox"/>            | <input type="checkbox"/>            |

(Proxy) voting

|   | LE                                  |
|---|-------------------------------------|
| Report on voting undertaken (with outcomes and examples)  | <input type="checkbox"/>            |
| Report on voting decisions taken  | <input checked="" type="checkbox"/> |
| Adherence with the agreed upon voting policy  | <input type="checkbox"/>            |
| Other RI considerations relating to (proxy) voting in investment management agreements; specify | <input type="checkbox"/>            |
| None of the above   | <input type="checkbox"/>            |

Outputs and outcomes

|        |           |        |                     |         |
|--------|-----------|--------|---------------------|---------|
| SAM 09 | Mandatory | Public | Additional Assessed | PRI 1,6 |
|--------|-----------|--------|---------------------|---------|

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.

Add Example 1

|                   |   |
|-------------------|---|
| Topic or issue    | ESG implementation in the investment process  |
| Conducted by      | <input checked="" type="checkbox"/> Internal staff  |
| Asset class       | <input type="checkbox"/> All asset classes<br><input checked="" type="checkbox"/> Listed Equity<br><input type="checkbox"/> Fixed income – corporate (non financial)<br><input type="checkbox"/> Property                     |
| Scope and process | Examples<br>-Exclusion of companies and reason for exclusion as opposed to engagement<br>-Separate staff for handling ESG related issues vs. directly implemented in portfolio manager work --> rationale behind the approach |
| Outcomes          | An understanding of why the process has been developed in such way  |

- Add Example 2
- Add Example 3
- Add Example 4
- Add Example 5
- Add Example 6
- Add Example 7
- We are not able to provide examples



Tradeka Corporation

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 |
|--------|-----------|--------|---------------------|---------|

**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)
- Other, specify
  - Through internal discussions
  - None of the above

|        |           |        |             |         |
|--------|-----------|--------|-------------|---------|
| CM1 02 | Mandatory | Public | Descriptive | General |
|--------|-----------|--------|-------------|---------|

**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 |
|--------|-----------|--------|-------------|---------|

**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
- None of the above

|        |           |        |             |         |
|--------|-----------|--------|-------------|---------|
| CM1 04 | Mandatory | Public | Descriptive | General |
|--------|-----------|--------|-------------|---------|

**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