



RI TRANSPARENCY REPORT

2019

Coöperatie DELA

About this report

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

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

PRI disclaimer

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OO 01	Mandatory	Gateway/Peering	General
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OO 01.1	Select the type that best describes your organisation or the services you provide.
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- 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

OO 01.3	Additional information. [Optional]
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DELA is a cooperation with more than three million members. Since our inception in 1937 the following applies: together we are stronger and can achieve more. Our goal is to help our members and their families. As a member of DELA, you can do more for yourself and your loved ones.

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

OO 02.2	Indicate the number of countries in which you have offices (including your headquarters).
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- 1
- 2-5
- 6-10
- >10

OO 02.3	Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).
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1469

OO 03	Mandatory	Descriptive	General
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OO 03.1	Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.
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- Yes
- No

OO 04	Mandatory	Gateway/Peering	General
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OO 04.1	Indicate the year end date for your reporting year.
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31/12/2018

OO 04.2	Indicate your total AUM at the end of your reporting year.
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Total AUM
5,520,225,336 EUR
6,297,987,171 USD

OO 05	Mandatory to Report, Voluntary to Disclose	Gateway	General
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OO 05.1	Provide an approximate percentage breakdown of your AUM at the end of your reporting year using the following asset classes and investment strategies:
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	Internally managed (%)	Externally managed (%)
Listed equity	0	10-50%
Fixed income	<10%	10-50%
Private equity	0	0
Property	10-50%	<10%
Infrastructure	0	<10%
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	0
Other (1), specify	0	0
Other (2), specify	0	0

OO 06	Mandatory	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

OO 06.3	Indicate whether your organisation has any off-balance sheet assets [Optional].
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- Yes
- No

OO 06.5	Indicate whether your organisation uses fiduciary managers.
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- Yes, we use a fiduciary manager and our response to OO 5.1 is reflective of their management of our assets.
- No, we do not use fiduciary managers.

OO 07	Mandatory to Report, Voluntary to Disclose	Gateway	General
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Private

OO 08	Mandatory to Report, Voluntary to Disclose	Peering	General
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Private

OO 09	Mandatory	Peering	General
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OO 09.1	Indicate the breakdown of your organisation's AUM by market.
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83

Developed Markets

17

Emerging Markets

0

Frontier Markets

0

Other Markets

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

- 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

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

Fixed income - corporate (financial)

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

Fixed income - corporate (non-financial)

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

Property

- 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>Listed equity - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <ul style="list-style-type: none"> <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
Fixed income - SSA	<p>Fixed income - SSA - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <ul style="list-style-type: none"> <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
Fixed income - corporate (financial)	<p>Fixed income - corporate (financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <ul style="list-style-type: none"> <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
Fixed income - corporate (non-financial)	<p>Fixed income - corporate (non-financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <ul style="list-style-type: none"> <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

Property	<p>Property - 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>
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>

OO 11.4 Provide a brief description of how your organisation includes responsible investment considerations in your investment manager selection, appointment and monitoring processes.

During the selection process we expect from managers to be a UNPRI signatory. Furthermore in the selection process we discuss the way in which they integrate ESG in their investment decisionmaking. To arrive at a short list many criteria are scored, of which ESG integration is one.

Upon appointment we formally put in the Investment Management Agreement the manager's obligation to integrate ESG criteria.

When monitoring, ESG is discussed in each quarterly review conference call with the manager. The manager also has to adhere to our restriction list.

OO 12 Mandatory 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	<p><input checked="" type="checkbox"/> Organisational Overview</p> <p><input checked="" type="checkbox"/> Strategy and Governance</p>
RI implementation directly or via service providers	<p>Direct - Listed Equity active ownership</p> <p><input checked="" type="checkbox"/> Engagements</p> <p><input checked="" type="checkbox"/> (Proxy) voting</p> <p>Direct - Other asset classes with dedicated modules</p> <p><input checked="" type="checkbox"/> Property</p>
RI implementation via external managers	<p>Indirect - Selection, Appointment and Monitoring of External Managers</p> <p><input checked="" type="checkbox"/> Listed Equities</p> <p><input checked="" type="checkbox"/> Fixed income - SSA</p> <p><input checked="" type="checkbox"/> Fixed income - Corporate (financial)</p> <p><input checked="" type="checkbox"/> Fixed income - Corporate (non-financial)</p> <p><input checked="" type="checkbox"/> Property</p> <p><input checked="" type="checkbox"/> Infrastructure</p>
Closing module	<p><input checked="" type="checkbox"/> Closing module</p>

OO FI 01 Mandatory Gateway General

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

Type	Passive	Active - quantitative	Active - fundamental & others	Total internally managed fixed income security
Corporate (financial)	<p><input type="radio"/> >50%</p> <p><input type="radio"/> 10-50%</p> <p><input type="radio"/> <10%</p> <p><input checked="" type="radio"/> 0%</p>	<p><input type="radio"/> >50%</p> <p><input type="radio"/> 10-50%</p> <p><input type="radio"/> <10%</p> <p><input checked="" type="radio"/> 0%</p>	<p><input checked="" type="radio"/> >50%</p> <p><input type="radio"/> 10-50%</p> <p><input type="radio"/> <10%</p> <p><input type="radio"/> 0%</p>	100%

Corporate (non-financial)	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%	<input checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%	100%
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OO FI 03	Mandatory	Descriptive	General
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OO FI 03.2 Indicate the approximate (+/- 5%) breakdown of your corporate and securitised investments by investment grade or high-yield securities.

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

OO SAM 01	Mandatory to Report, Voluntary to Disclose	Gateway	General
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Private

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

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

OO PR 03	Mandatory to Report, Voluntary to Disclose	Descriptive	General
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Private

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

SG 01.2	Indicate the components/types and coverage of your policy.
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Policy components/types	Coverage by AUM
<input checked="" type="checkbox"/> Policy setting out your overall approach <input type="checkbox"/> Formalised guidelines on environmental factors <input 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 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="checkbox"/> Applicable policies cover all AUM <input type="checkbox"/> Applicable policies cover a majority of AUM <input type="checkbox"/> Applicable policies cover a minority of AUM

SG 01.3	Indicate if the investment policy covers any of the following
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- 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.
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The excess returns have always been reinvested carefully and by the requirements of the law. As such DELA is among the financially strongest insurers. DELA has no shareholders.

As a funeral insurance company DELA's obligations are for many years. We always focus on the long term. DELA therefore invests in sustainable companies who take social aspects, environment and governance into account. Countries and companies that do not comply with international guidelines or show insufficient improvements are excluded.

Please refer to <https://www.dela.nl/over-dela/over-cooperatie-dela/governance/ons-beleid> for a full overview of our investment policy and for our specific policy on responsible investment.

SG 01.5	Provide a brief description of the key elements, any variations or exceptions to your investment policy that covers your responsible investment approach. [Optional]
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Please refer to <https://www.dela.nl/over-dela/over-cooperatie-dela/governance/ons-beleid> for a full overview of our investment policy and for our specific policy on responsible investment.

No

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
<input checked="" type="checkbox"/> URL https://www.dela.nl/-/media/files/corporate/181203_mvb-beleid-2018.pdf <input type="checkbox"/> Attachment (will be made public)

- Formalised guidelines on corporate governance factors

URL/Attachment
<input checked="" type="checkbox"/> URL

<https://www.dela.nl/over-dela/over-cooperatie-dela/governance/ons-beleid/maatschappelijk-verantwoord-beleggen>

Attachment (will be made public)

Screening / exclusions policy

URL/Attachment

URL

<https://www.dela.nl/over-dela/over-cooperatie-dela/governance/ons-beleid/maatschappelijk-verantwoord-beleggen>

Attachment (will be made public)

Engagement policy

URL/Attachment

URL

<https://www.dela.nl/-/media/files/corporate/responsible-ownership-policy-bmo-gam.pdf>

Attachment (will be made public)

(Proxy) voting policy

URL/Attachment

URL

<https://www.dela.nl/-/media/files/corporate/stembeleid-coöperatie-dela.pdf>

Attachment (will be made public)

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

<https://www.dela.nl/-/media/files/corporate/mvb-beleid.pdf?la=nl-nl&hash=789DAA7F77B59C03C464B9A18519828F605BADE5>

Attachment

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

Time horizon of your investment

URL/Attachment

URL

<https://www.dela.nl/-/media/files/corporate/mvb-beleid.pdf?la=nl-nl&hash=789DAA7F77B59C03C464B9A18519828F605BADE5>

Attachment

Governance structure of organisational ESG responsibilities

URL/Attachment

URL

<https://www.dela.nl/-/media/files/corporate/mvb-beleid.pdf?la=nl-nl&hash=789DAA7F77B59C03C464B9A18519828F605BADE5>

Attachment

ESG incorporation approaches

URL/Attachment

URL

<https://www.dela.nl/-/media/files/corporate/mvb-beleid.pdf?la=nl-nl&hash=789DAA7F77B59C03C464B9A18519828F605BADE5>

Attachment

Active ownership approaches

URL/Attachment

URL

<https://www.dela.nl/-/media/files/corporate/responsible-ownership-policy-bmo-gam.pdf>

Attachment

Reporting

URL/Attachment

URL

<https://www.dela.nl/over-dela/over-cooperatie-dela/governance/ons-beleid/maatschappelijk-verantwoord-beleggen>

- Attachment
- We do not publicly disclose any investment policy components

SG 03	Mandatory	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.
<input type="radio"/> Yes <input checked="" type="radio"/> No	

SG 04	Voluntary	Descriptive	General
Private			

SG 05	Mandatory	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.
<input type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input checked="" type="radio"/> Annually <input type="radio"/> Less frequently than annually <input type="radio"/> Ad-hoc basis <input type="radio"/> It is not set/reviewed	

SG 05.2	Additional information. [Optional]
<p>DELA has a responsible investment policy which can be found on the website. This document is updated on an annual basis. The restriction list that DELA and all its external managers use is updated more frequently (twice a year). For engagement DELA sets on an annual basis specific targets by way of specific projects - like Carbon footprinting and prioritising certain sectors and companies. Results are monitored and communicated in milestones on a quarterly basis. Moreover, we provide input annually to the client consultation setting the priorities for the engagement program that is executed by BMO GAM.</p>	

SG 06	Voluntary	Descriptive	General
Private			

SG 07	Mandatory	Core Assessed	General
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SG 07.1	Indicate the internal and/or external roles used by your organisation, and indicate for each whether they have oversight and/or implementation responsibilities for responsible investment.
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Roles			
<input checked="" type="checkbox"/> Board members or trustees <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Oversight/accountability for responsible investment <input checked="" type="checkbox"/> Implementation of responsible investment <input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment 			
<input checked="" type="checkbox"/> Internal Roles (triggers other options) <table border="1" style="margin-top: 10px;"> <thead> <tr> <th style="background-color: #0070C0; color: white;">Select from the below internal roles</th> </tr> </thead> <tbody> <tr> <td> <input checked="" type="checkbox"/> Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Oversight/accountability for responsible investment <input checked="" type="checkbox"/> Implementation of responsible investment <input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment </td> </tr> <tr> <td> <input type="checkbox"/> Other Chief-level staff or head of department, specify <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Portfolio managers <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Oversight/accountability for responsible investment <input checked="" type="checkbox"/> Implementation of responsible investment <input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment <input type="checkbox"/> Investment analysts <input type="checkbox"/> Dedicated responsible investment staff <input type="checkbox"/> Investor relations <input type="checkbox"/> Other role, specify (1) <input type="checkbox"/> Other role, specify (2) </td> </tr> </tbody> </table>	Select from the below internal roles	<input checked="" type="checkbox"/> Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Oversight/accountability for responsible investment <input checked="" type="checkbox"/> Implementation of responsible investment <input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment 	<input type="checkbox"/> Other Chief-level staff or head of department, specify <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Portfolio managers <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Oversight/accountability for responsible investment <input checked="" type="checkbox"/> Implementation of responsible investment <input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment <input type="checkbox"/> Investment analysts <input type="checkbox"/> Dedicated responsible investment staff <input type="checkbox"/> Investor relations <input type="checkbox"/> Other role, specify (1) <input type="checkbox"/> Other role, specify (2)
Select from the below internal roles			
<input checked="" type="checkbox"/> Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Oversight/accountability for responsible investment <input checked="" type="checkbox"/> Implementation of responsible investment <input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment 			
<input type="checkbox"/> Other Chief-level staff or head of department, specify <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Portfolio managers <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Oversight/accountability for responsible investment <input checked="" type="checkbox"/> Implementation of responsible investment <input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment <input type="checkbox"/> Investment analysts <input type="checkbox"/> Dedicated responsible investment staff <input type="checkbox"/> Investor relations <input type="checkbox"/> Other role, specify (1) <input type="checkbox"/> Other role, specify (2) 			
<input checked="" type="checkbox"/> External managers or service providers <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Oversight/accountability for responsible investment <input checked="" type="checkbox"/> Implementation of responsible investment <input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment 			

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

RI staff are tasked with executing RI-related activities, including the outsourcing of engagement, voting and ESG integration. They are also the main contributors to the development of the organisation's RI strategy and policies. Portfolio analysts and managers are ultimately responsible for selecting external managers who integrate ESG factors into the investment decision-making process and who at least have signed the UN PRI.

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

1

SG 08	Voluntary	Additional Assessed	General
Private			

SG 09	Mandatory	Core Assessed	PRI 4,5
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SG 09.1 Select the collaborative organisation and/or initiatives of which your organisation is a member or in which it participated during the reporting year, and the role you played.

Principles for Responsible Investment

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

- Asian Corporate Governance Association
- Australian Council of Superannuation Investors
- AFIC – La Commission ESG
- BVCA – Responsible Investment Advisory Board
- CDP Climate Change
- CDP Forests
- CDP Water
- CFA Institute Centre for Financial Market Integrity
- Code for Responsible Investment in SA (CRISA)
- Code for Responsible Finance in the 21st Century
- Council of Institutional Investors (CII)
- Eumedion

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

- 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)

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

Green Bond Principles

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

Institutional Investors Group on Climate Change (IIGCC)

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

- Interfaith Center on Corporate Responsibility (ICCR)
- International Corporate Governance Network (ICGN)
- Investor Group on Climate Change, Australia/New Zealand (IGCC)
- International Integrated Reporting Council (IIRC)
- Investor Network on Climate Risk (INCR)/CERES
- Local Authority Pension Fund Forum
- Principles for Sustainable Insurance
- Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify
- 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

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

- Other collaborative organisation/initiative, specify

ILO, Governance Code and Code Duurzaam Beleggen van Verbond van Verzekeraars

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

- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify

SG 09.2	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1
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Private

SG 10	Mandatory	Core Assessed	PRI 4
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SG 10.1	Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.
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- 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.
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- 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
BMO facilitates dialogue on responsible investing for clients, webinars accessible to clients as well as investee companies

Frequency of contribution
<input type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input checked="" type="radio"/> Annually <input type="radio"/> Less frequently than annually <input type="radio"/> Ad hoc <input type="radio"/> 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
Through encouraging the adoption of stewardship principles/codes across various jurisdictions.

Frequency of contribution
<input checked="" type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input type="radio"/> Ad hoc <input type="radio"/> Other

- Spoke publicly at events and conferences to promote responsible investment
- Wrote and published in-house research papers on responsible investment
- Encouraged the adoption of the PRI

Description
Through engagement by BMO with companies we invest in

Frequency of contribution
<input checked="" type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input type="radio"/> Ad hoc

- Other
- Responded to RI related consultations by non-governmental organisations (OECD, FSB etc.)

Description
BMO contributes to public policy on our behalf, where we seek to be a constructive investor voice, and to advocate policies that raise the bar for the management of ESG risks faced by the companies in which we invest.

Frequency of contribution
<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
<input type="checkbox"/> Other

- Wrote and published articles on responsible investment in the media
 - A member of PRI advisory committees/ working groups, specify
 - On the Board of, or officially advising, other RI organisations (e.g. local SIFs)
 - Other, specify
- No

SG 11	Voluntary	Additional Assessed	PRI 4,5,6
Private			

SG 12	Mandatory	Core Assessed	PRI 4
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SG 12.1	Indicate whether your organisation uses investment consultants.
<input type="checkbox"/> Yes, we use investment consultants	
<input checked="" type="checkbox"/> No, we do not use investment consultants.	

SG 13	Mandatory	Descriptive	PRI 1
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SG 13.1	Indicate whether the organisation undertakes scenario analysis and/or modelling and provide a description of the scenario analysis (by asset class, sector, strategic asset allocation, etc.).
<input type="checkbox"/> Yes, to assess future ESG factors	
<input type="checkbox"/> Yes, to assess future climate-related risks and opportunities	
<input checked="" type="checkbox"/> No, not to assess future ESG/climate-related issues	

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

SG 15	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1
Private			

SG 18	Voluntary	Descriptive	General
Private			

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

Do you disclose?
<input type="radio"/> We do not disclose to either clients/beneficiaries or the public.
<input type="radio"/> We disclose to clients/beneficiaries only.
<input checked="" type="checkbox"/> We disclose to the public

The information disclosed to clients/beneficiaries is the same
<input checked="" type="checkbox"/> Yes
<input type="radio"/> No

Disclosure to public and URL

Disclosure to public and URL	
<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 checked="" 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
Annually	
https://www.dela.nl/-/media/files/corporate/mvb-beleid.pdf?la=nl-nl&hash=789DAA7F77B59C03C464B9A18519828F605BADE5 https://www.dela.nl/over-dela/over-cooperatie-dela/governance/ons-beleid/maatschappelijk-verantwoord-beleggen	

Listed equity - Engagement

Do you disclose?	
<input type="radio"/>	We do not disclose to either clients/beneficiaries or the public.
<input type="radio"/>	We disclose to clients/beneficiaries only.
<input checked="" type="radio"/>	We disclose to the public
The information disclosed to clients/beneficiaries is the same	
<input checked="" type="radio"/>	Yes
<input type="radio"/>	No

Disclosure to public and URL	
Disclosure to public and URL	
<input checked="" type="checkbox"/>	Details on the overall engagement strategy
<input 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 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
Quarterly or more frequently	
https://www.dela.nl/over-dela/over-cooperatie-dela/governance/ons-beleid/maatschappelijk-verantwoord-beleggen https://www.dela.nl/-/media/files/corporate/stem-en-engagementverklaring-4e-kwartaal-2017.pdf?la=nl-nl&hash=B044CF4408BE7432B25D5742C939863292D6E567	

Listed equity – (Proxy) Voting

Do you disclose?	
<input type="radio"/>	We do not disclose to either clients/beneficiaries or the public.
<input type="radio"/>	We disclose to clients/beneficiaries only.
<input checked="" type="radio"/>	We disclose to the public
The information disclosed to clients/beneficiaries is the same	
<input checked="" type="radio"/>	Yes
<input type="radio"/>	No

Disclosure to public and URL	
Disclosure to public and URL	
<input type="radio"/>	Disclose all voting decisions
<input type="radio"/>	Disclose some voting decisions
<input checked="" type="radio"/>	Only disclose abstentions and votes against management
Quarterly or more frequently	

<https://www.dela.nl/over-dela/over-cooperatie-dela/governance/ons-beleid/maatschappelijk-verantwoord-beleggen>
<https://www.dela.nl/-/media/files/corporate/stem-en-engagementverklaring-4e-kwartaal-2017.pdf?la=nl-nl&hash=B044CF4408BE7432B25D5742C939863292D6E567>

Property

Do you disclose?

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

Disclosure to clients/beneficiaries

Disclosure to clients/beneficiaries

- ESG information on how you select property investments
- ESG information on how you monitor and manage property investments
- Information on your property investments' ESG performance
- Other

Annually

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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Integration	<input checked="" type="checkbox"/>	<input 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"/>

Passive investment strategies				
Passive 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Integration	<input checked="" type="checkbox"/>	<input 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"/>

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)	Property	Infrastructure
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"/>	<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"/>	<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"/>	<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"/>	<input 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"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

In its due diligence processes DELTA takes into account whether a manager has signed up to the UN PRI.

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)	Property	Infrastructure
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"/>	<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"/>	<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"/>	<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"/>	<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"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>	<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"/>	<input type="checkbox"/>	<input type="checkbox"/>

ESG people/oversight

	LE	FI - SSA	FI - Corporate (financial)	FI - Corporate (non-financial)	Property	Infrastructure
Assess ESG expertise of investment teams	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<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"/>	<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"/>	<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"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>	<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"/>	<input type="checkbox"/>	<input type="checkbox"/>

Process/portfolio construction/investment valuation

	LE	FI - SSA	FI - Corporate (financial)	FI - Corporate (non-financial)	Property	Infrastructure
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"/>	<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"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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"/>	<input checked="" type="checkbox"/>	<input 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"/>	<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"/>	<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"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Review how ESG materiality is evaluated by the manager	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Review process for defining and communicating on ESG incidents	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other, specify	<input type="checkbox"/>	<input type="checkbox"/>	<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"/>	<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 - SSA	FI - Corporate (financial)	FI - Corporate (non-financial)	Property	Infrastructure
ESG performance development targets	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ESG score	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<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"/>	<input type="checkbox"/>	<input type="checkbox"/>
Real world economy targets	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other RI considerations	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<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"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

ESG is one of the elements that is reviewed in the manager selection process. We developed an inhouse scorecard on which we score the short list managers. ESG is an item on this and hence it directly influences the scores and hence the decision for a specific manager.

SAM 02.5 Describe how the ESG information reviewed and discussed affects the selection decision making process.[OPTIONAL]

ESG is one of the elements that is reviewed in the manager selection process. We developed an inhouse scorecard on which we score the short list managers. ESG is an item on this and hence it directly influences the scores and hence the decision for a specific manager.

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 04.2 Provide an example per asset class of your benchmarks, objectives, incentives/controls and reporting requirements that would typically be included in your managers' appointment.

	Asset class								
<input checked="" type="checkbox"/> Listed equity (LE)	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="background-color: #0070C0; color: white;">Benchmark</th> </tr> </thead> <tbody> <tr> <td> <input checked="" type="checkbox"/> Standard benchmark <input type="checkbox"/> ESG benchmark, specify </td> </tr> </tbody> </table> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="background-color: #0070C0; color: white;">ESG Objectives</th> </tr> </thead> <tbody> <tr> <td> <input type="checkbox"/> ESG related strategy, specify <input type="checkbox"/> ESG related investment restrictions, specify <input checked="" type="checkbox"/> ESG integration, specify ie taking ESG aspects into account in the analysis and price targets for stocks <input checked="" type="checkbox"/> Engagement, specify In cooperation with our ESG provider, we determine priorities for engagement and voting on an annual basis. <input checked="" type="checkbox"/> Voting, specify In cooperation with our ESG provider , each year we determine the priorities of our engagement and voting policy. <input type="checkbox"/> Promoting responsible investment <input type="checkbox"/> ESG specific improvements <input type="checkbox"/> ESG guidelines/regulation, principles/standards, specify <input type="checkbox"/> Other, specify </td> </tr> </tbody> </table> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="background-color: #0070C0; color: white;">Incentives and controls</th> </tr> </thead> <tbody> <tr> <td> <input type="checkbox"/> Fee based incentive <input checked="" type="checkbox"/> Communication and remedy of breaches <input type="checkbox"/> Termination <input type="checkbox"/> No fee/ breach of contract </td> </tr> </tbody> </table> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="background-color: #0070C0; color: white;">Reporting requirements</th> </tr> </thead> <tbody> <tr> <td> <input type="radio"/> Monthly <input checked="" type="radio"/> Quarterly <input type="radio"/> Bi-annually <input type="radio"/> Annually <input type="radio"/> Ad-hoc/when requested </td> </tr> </tbody> </table>	Benchmark	<input checked="" type="checkbox"/> Standard benchmark <input type="checkbox"/> ESG benchmark, specify	ESG Objectives	<input type="checkbox"/> ESG related strategy, specify <input type="checkbox"/> ESG related investment restrictions, specify <input checked="" type="checkbox"/> ESG integration, specify ie taking ESG aspects into account in the analysis and price targets for stocks <input checked="" type="checkbox"/> Engagement, specify In cooperation with our ESG provider, we determine priorities for engagement and voting on an annual basis. <input checked="" type="checkbox"/> Voting, specify In cooperation with our ESG provider , each year we determine the priorities of our engagement and voting policy. <input type="checkbox"/> Promoting responsible investment <input type="checkbox"/> ESG specific improvements <input type="checkbox"/> ESG guidelines/regulation, principles/standards, specify <input type="checkbox"/> Other, specify	Incentives and controls	<input type="checkbox"/> Fee based incentive <input checked="" type="checkbox"/> Communication and remedy of breaches <input type="checkbox"/> Termination <input type="checkbox"/> No fee/ breach of contract	Reporting requirements	<input type="radio"/> Monthly <input checked="" type="radio"/> Quarterly <input type="radio"/> Bi-annually <input type="radio"/> Annually <input type="radio"/> Ad-hoc/when requested
Benchmark									
<input checked="" type="checkbox"/> Standard benchmark <input type="checkbox"/> ESG benchmark, specify									
ESG Objectives									
<input type="checkbox"/> ESG related strategy, specify <input type="checkbox"/> ESG related investment restrictions, specify <input checked="" type="checkbox"/> ESG integration, specify ie taking ESG aspects into account in the analysis and price targets for stocks <input checked="" type="checkbox"/> Engagement, specify In cooperation with our ESG provider, we determine priorities for engagement and voting on an annual basis. <input checked="" type="checkbox"/> Voting, specify In cooperation with our ESG provider , each year we determine the priorities of our engagement and voting policy. <input type="checkbox"/> Promoting responsible investment <input type="checkbox"/> ESG specific improvements <input type="checkbox"/> ESG guidelines/regulation, principles/standards, specify <input type="checkbox"/> Other, specify									
Incentives and controls									
<input type="checkbox"/> Fee based incentive <input checked="" type="checkbox"/> Communication and remedy of breaches <input type="checkbox"/> Termination <input type="checkbox"/> No fee/ breach of contract									
Reporting requirements									
<input type="radio"/> Monthly <input checked="" type="radio"/> Quarterly <input type="radio"/> Bi-annually <input type="radio"/> Annually <input type="radio"/> Ad-hoc/when requested									
<input checked="" type="checkbox"/> Fixed income - SSA (SSA)	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="background-color: #0070C0; color: white;">Benchmark</th> </tr> </thead> <tbody> <tr> <td> <input type="checkbox"/> Standard benchmark, specify <input checked="" type="checkbox"/> ESG benchmark, specify We use an inhouse developed benchmark which only includes countries with sound credit profiles and sound ESG profiles. This is assessed periodically through the external manager's Sovereign Risk Indicator. </td> </tr> </tbody> </table> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="background-color: #0070C0; color: white;">ESG Objectives</th> </tr> </thead> <tbody> <tr> <td> <input type="checkbox"/> ESG related strategy, specify <input type="checkbox"/> ESG related investment restrictions, specify <input checked="" type="checkbox"/> ESG integration, specify See above. Both credit and ESG considerations play a role in establishing the benchmark countries. </td> </tr> </tbody> </table>	Benchmark	<input type="checkbox"/> Standard benchmark, specify <input checked="" type="checkbox"/> ESG benchmark, specify We use an inhouse developed benchmark which only includes countries with sound credit profiles and sound ESG profiles. This is assessed periodically through the external manager's Sovereign Risk Indicator.	ESG Objectives	<input type="checkbox"/> ESG related strategy, specify <input type="checkbox"/> ESG related investment restrictions, specify <input checked="" type="checkbox"/> ESG integration, specify See above. Both credit and ESG considerations play a role in establishing the benchmark countries.				
Benchmark									
<input type="checkbox"/> Standard benchmark, specify <input checked="" type="checkbox"/> ESG benchmark, specify We use an inhouse developed benchmark which only includes countries with sound credit profiles and sound ESG profiles. This is assessed periodically through the external manager's Sovereign Risk Indicator.									
ESG Objectives									
<input type="checkbox"/> ESG related strategy, specify <input type="checkbox"/> ESG related investment restrictions, specify <input checked="" type="checkbox"/> ESG integration, specify See above. Both credit and ESG considerations play a role in establishing the benchmark countries.									

- Engagement, specify
- Voting, specify
- Promoting responsible investment
- ESG specific improvements
- ESG guidelines/regulation, principles/standards, specify
- Other, specify

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
Standard benchmark but with DELA exclusion list
- ESG benchmark, specify

ESG Objectives

- Other, specify
- ESG related strategy, specify
Dedicated bucket for green bonds in this mandate
- ESG related investment restrictions, specify
- ESG integration, specify
ESG as part of the credit analysis
- Engagement, specify
In cooperation with our ESG provider, we determine priorities for engagement on an annual basis.
- Voting, specify
- Promoting responsible investment
- ESG specific improvements
- ESG guidelines/regulation, principles/standards, specify
- Other, specify

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
With DELA exclusion list
- ESG benchmark, specify

ESG Objectives
<input type="checkbox"/> Other, specify <input checked="" type="checkbox"/> ESG related strategy, specify Dedicated bucket for green bonds in this mandate <input type="checkbox"/> ESG related investment restrictions, specify <input checked="" type="checkbox"/> ESG integration, specify ESG factors taken into account in credit analysis <input checked="" type="checkbox"/> Engagement, specify In cooperation with our ESG provider, we determine priorities for engagement on an annual basis. <input type="checkbox"/> Voting, specify <input type="checkbox"/> Promoting responsible investment <input type="checkbox"/> ESG specific improvements <input type="checkbox"/> ESG guidelines/regulation, principles/standards, specify <input type="checkbox"/> Other, specify

Incentives and controls
<input type="checkbox"/> Fee based incentive <input checked="" type="checkbox"/> Communication and remedy of breaches <input type="checkbox"/> Termination <input type="checkbox"/> No fee/ breach of contract

Reporting requirements
<input type="radio"/> Ad-hoc/when requested <input type="radio"/> Annually <input type="radio"/> Bi-annually <input checked="" type="radio"/> Quarterly <input type="radio"/> Monthly

Property

Benchmark
<input checked="" type="checkbox"/> Standard benchmark, specify standard benchmark <input type="checkbox"/> ESG benchmark, specify

ESG Objectives
<input type="checkbox"/> ESG related strategy, specify <input type="checkbox"/> ESG related investment restrictions, specify <input checked="" type="checkbox"/> ESG integration, specify Make sure ESG factors are taken into account in property and portfolio management <input type="checkbox"/> Engagement, specify <input type="checkbox"/> Voting, specify <input type="checkbox"/> Promoting responsible investment <input type="checkbox"/> ESG specific improvements <input type="checkbox"/> ESG guidelines/regulation, principles/standards, specify <input type="checkbox"/> Other, specify

Incentives and controls
<input type="checkbox"/> Fee based incentive <input checked="" type="checkbox"/> Communication and remedy of breaches <input type="checkbox"/> Termination <input type="checkbox"/> No fee/ breach of contract

Reporting requirements
<input type="radio"/> Monthly <input checked="" type="radio"/> Quarterly <input type="radio"/> Bi-annually <input type="radio"/> Annually <input type="radio"/> Ad-hoc/when requested

Infrastructure

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

SAM 05 **Mandatory** **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 - SSA	FI - Corporate (financial)	FI - Corporate (non-financial)	Property	Infrastructure
ESG objectives linked to investment strategy (with examples)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<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"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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"/>	<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"/>	<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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Metrics on the real economy influence of the investments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PRI Transparency Reports	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PRI Assessment Reports	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
RI-promotion and engagement with the industry to enhance RI implementation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Changes to the oversight and responsibilities of ESG implementation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<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"/>	<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"/>	<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)	Property	Infrastructure
ESG score	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
ESG weight	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
ESG performance minimum threshold	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Real world economy targets	<input type="checkbox"/>	<input type="checkbox"/>	<input 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"/>	<input type="checkbox"/>	<input type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	<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]

During all quarterly review meetings with both active and passive managers we spend time discussing ESG. We usually talk about the ESG characteristics of the portfolio and some real live examples of how ESG factors influenced decision making for the portfolio manager during that quarter. We also typically discuss DELTA's Restriction List and how it impacted performance versus the benchmark.

SAM 08 **Mandatory to Report, Voluntary to Disclose** **Descriptive** **PRI 1**

Private

SAM 09 **Mandatory** **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	Measurement and reporting of ESG performance across portfolio companies by Infrastructure Fund managers
Conducted by	Internal staff
Asset class	Infrastructure
Scope and process	During the Annual Meeting we (and other investors) requested the Fund Manager to provide quantitative ESG data in their annual and/or quarterly reports.
Outcomes	This discussion led to quantitative ESG measurement and (quarterly and Annual) reporting by Fund Managers

Add Example 2

Topic or issue	Selection of EMD LC manager
Conducted by	Internal staff
Asset class	Fixed income – SSA
Scope and process	ESG factors are fully integrated in the risk assessment of each country's credit. The manager constructs a risk template for each country that takes into consideration economic risks ('ability to pay') and environmental, social and governance risks ('willingness to pay'). Factors such as sanctions also contribute to the analysis. A score is determined for the country, which is reviewed quarterly by the investment team or more frequently when the country is the subject of additional investment research.
Outcomes	Manager is actively applying the risk assessment of each country's credit, which is reflected in quarterly review documentation.

Add Example 3

Add Example 4

Add Example 5

Add Example 6

Add Example 7

We are not able to provide examples

LEA 01.1 Indicate whether your organisation has an active ownership policy.

Yes

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

Attachment provided:

URL provided:

<https://www.bmogam.com/gb-en/intermediary/wp-content/uploads/2018/10/responsible-ownership-policy.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
- Method of engagement
- Transparency of engagement activities
- Due diligence and monitoring process
- Insider information
- Escalation strategies
- Service Provider specific criteria
- Other specify;

(Proxy) voting approach

Voting

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

Other

None of the above

No

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

Yes

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

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

No

LEA 01.6	Additional information [optional]
BMO GAM's approach to engagement is based on constructive and confidential company dialogue and on building a relationship of trust, where over time we seek to gain a sound understanding of how companies manage the key ESG issues linked to their activities. We will encourage improvement in ESG management should they deem existing practices insufficient to respond to ESG risks and/or opportunities.	

LEA 02	Mandatory	Core Assessed	PRI 1,2,3
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LEA 02.1	Indicate the method of engagement, giving reasons for the interaction.
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Type of engagement	Reason for interaction
Individual / Internal staff engagements	<input type="checkbox"/> To influence corporate practice (or identify the need to influence) 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 internal staff
Collaborative engagements	<input type="checkbox"/> To influence corporate practice (or identify the need to influence) 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 collaborative engagements
Service provider engagements	<input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence) 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 service providers

LEA 02.2	Indicate whether your organisation plays a role in the engagement process that your service provider conducts.
----------	--

Yes

LEA 02.3	Indicate the role(s) you play in engagements that your service provider conducts on your behalf.
----------	--

- Discuss the topic (or ESG issue(s)) of engagement
- Discuss the rationale for engagement
- Discuss the objectives of the engagement
- Select the companies to be engaged with
- Discuss the frequency/intensity of interactions with companies
- Discuss next steps for engagement activity
- Participate directly in certain engagements with your service provider
- Other; specify
- We play no role in engagements that our service provider conducts.

No

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

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

Service Provider engagements	Service Provider engagements
	<input checked="" type="checkbox"/> Geography / market of the companies <input checked="" type="checkbox"/> Materiality of ESG factors <input checked="" type="checkbox"/> Exposure (size of holdings) <input checked="" type="checkbox"/> Responses to ESG impacts that have already occurred <input type="checkbox"/> Responses to divestment pressure <input checked="" type="checkbox"/> Consultation with clients/beneficiaries <input type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) <input type="checkbox"/> Follow-up from 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 service providers.
<input type="radio"/> No	

LEA 04	Mandatory	Core Assessed	PRI 2
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LEA 04.1	Indicate whether you define specific objectives for your organisation's engagement activities.
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Service provider engagements	<input checked="" type="checkbox"/> 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 our service providers.
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LEA 05	Mandatory	Core Assessed	PRI 2
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LEA 05.1	Indicate if you monitor and/or review engagement outcomes.
----------	--

Service provider engagements	<input type="radio"/> Yes, in all cases <input type="radio"/> Yes, in majority of cases <input checked="" type="radio"/> Yes, in minority of cases <input type="radio"/> We do not monitor, or review engagement outcomes carried out by our service providers.
------------------------------	--

LEA 05.2	Indicate if you do any of the following to monitor and review the progress of engagement activities.
----------	--

Service provider engagements	<input type="checkbox"/> Define timelines/milestones for your objectives <input type="checkbox"/> Track and/or monitor progress against defined objectives and/or KPIs <input type="checkbox"/> Track and/or monitor the progress of action taken when original objectives are not met <input type="checkbox"/> Revisit and, if necessary, revise objectives on continuous basis <input checked="" type="checkbox"/> Other, specify <p style="text-align: center;">We have regular meetings with our engagement provider to discuss engagement activities and outcomes</p>
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LEA 06	Mandatory	Additional Assessed	PRI 2,4
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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 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 07	Voluntary	Additional Assessed	PRI 1,2				
LEA 07.1	Indicate whether insights gained from your organisation's engagements are shared with investment decision-makers.						
	<table border="1"> <thead> <tr> <th>Type of engagement</th> <th>Insights shared</th> </tr> </thead> <tbody> <tr> <td>Service provider engagements</td> <td> <input checked="" type="checkbox"/> Yes, systematically <input type="checkbox"/> Yes, occasionally <input type="checkbox"/> No </td> </tr> </tbody> </table>	Type of engagement	Insights shared	Service provider engagements	<input checked="" type="checkbox"/> Yes, systematically <input type="checkbox"/> Yes, occasionally <input type="checkbox"/> No		
Type of engagement	Insights shared						
Service provider engagements	<input checked="" type="checkbox"/> Yes, systematically <input type="checkbox"/> Yes, occasionally <input type="checkbox"/> No						
LEA 07.2	Indicate the practices used to ensure information and insights collected through engagements are shared with investment decision-makers.						
	<input type="checkbox"/> Involving investment decision-makers when developing engagement programme <input checked="" type="checkbox"/> Holding investment team meetings and/or presentations <input type="checkbox"/> Using IT platforms/systems that enable data sharing <input type="checkbox"/> Internal process that requires portfolio managers to re-balance holdings based on interaction and outcome levels <input type="checkbox"/> Other; specify <input type="checkbox"/> None						
LEA 07.3	Indicate whether insights gained from your organisation's engagements are shared with your clients/beneficiaries.						
	<table border="1"> <thead> <tr> <th>Type of engagement</th> <th>Insights shared</th> </tr> </thead> <tbody> <tr> <td>Service provider engagements</td> <td> <input checked="" type="checkbox"/> Yes, systematically <input type="checkbox"/> Yes, occasionally <input type="checkbox"/> No </td> </tr> </tbody> </table>	Type of engagement	Insights shared	Service provider engagements	<input checked="" type="checkbox"/> Yes, systematically <input type="checkbox"/> Yes, occasionally <input type="checkbox"/> No		
Type of engagement	Insights shared						
Service provider engagements	<input checked="" type="checkbox"/> Yes, systematically <input type="checkbox"/> Yes, occasionally <input type="checkbox"/> No						
LEA 07.4	Additional information. [Optional]						
	Engagements and milestones (results of previous engagement) are reported by and discussed with our service provider on a quarterly basis (see https://www.dela.nl/over-dela/over-cooperatie-dela/governance/ons-beleid/maatschappelijk-verantwoord-beleggen).						

LEA 08	Mandatory	Gateway	PRI 2
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LEA 08.1	Indicate if you track the number of your engagement activities.						
	<table border="1"> <thead> <tr> <th>Type of engagement</th> <th>Tracking engagements</th> </tr> </thead> <tbody> <tr> <td>Service provider engagements</td> <td> <input checked="" type="checkbox"/> Yes, we track the number of our engagements in full <input type="checkbox"/> Yes, we partially track the number of our engagements <input type="checkbox"/> We do not track </td> </tr> </tbody> </table>	Type of engagement	Tracking engagements	Service provider engagements	<input checked="" type="checkbox"/> Yes, we track the number of our engagements in full <input type="checkbox"/> Yes, we partially track the number of our engagements <input type="checkbox"/> We do not track		
Type of engagement	Tracking engagements						
Service provider engagements	<input checked="" type="checkbox"/> Yes, we track the number of our engagements in full <input type="checkbox"/> Yes, we partially track the number of our engagements <input type="checkbox"/> We do not track						
LEA 08.2	Additional information. [OPTIONAL]						
	Engagements and milestones (results of previous engagement) are reported by and discussed with our service provider on a quarterly basis (see https://www.dela.nl/over-dela/over-cooperatie-dela/governance/ons-beleid/maatschappelijk-verantwoord-beleggen).						

LEA 09	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 2
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Private

LEA 10	Voluntary	Additional Assessed	PRI 2
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Private

LEA 11	Voluntary	Descriptive	PRI 2
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Private

LEA 12	Mandatory	Descriptive	PRI 2
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LEA 12.1	Indicate how you typically make your (proxy) voting decisions.							
	<table border="1"> <thead> <tr> <th>Approach</th> </tr> </thead> <tbody> <tr> <td> <input type="checkbox"/> We use our own research or voting team and make voting decisions without the use of service providers. <input type="checkbox"/> We hire service provider(s) who make voting recommendations and/or provide research that we use to guide our voting decisions. <input type="checkbox"/> We hire service provider(s) who make voting decisions on our behalf, except for some pre-defined scenarios where we review and make voting decisions. <input checked="" type="checkbox"/> We hire service provider(s) who make voting decisions on our behalf. </td> </tr> <tr> <td> <table border="1"> <thead> <tr> <th>Based on</th> </tr> </thead> <tbody> <tr> <td> <input type="checkbox"/> the service provider voting policy we sign off on <input checked="" type="checkbox"/> our own voting policy <input type="checkbox"/> our clients' requests or policies </td> </tr> </tbody> </table> </td> </tr> </tbody> </table>			Approach	<input type="checkbox"/> We use our own research or voting team and make voting decisions without the use of service providers. <input type="checkbox"/> We hire service provider(s) who make voting recommendations and/or provide research that we use to guide our voting decisions. <input type="checkbox"/> We hire service provider(s) who make voting decisions on our behalf, except for some pre-defined scenarios where we review and make voting decisions. <input checked="" type="checkbox"/> We hire service provider(s) who make voting decisions on our behalf.	<table border="1"> <thead> <tr> <th>Based on</th> </tr> </thead> <tbody> <tr> <td> <input type="checkbox"/> the service provider voting policy we sign off on <input checked="" type="checkbox"/> our own voting policy <input type="checkbox"/> our clients' requests or policies </td> </tr> </tbody> </table>	Based on	<input type="checkbox"/> the service provider voting policy we sign off on <input checked="" type="checkbox"/> our own voting policy <input type="checkbox"/> our clients' requests or policies
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<input type="checkbox"/> the service provider voting policy we sign off on <input checked="" type="checkbox"/> our own voting policy <input type="checkbox"/> our clients' requests or policies								

other, explain

LEA 12.2 Provide an overview of how you ensure your voting policy is adhered to, giving details of your approach when exceptions to the policy are made.

To ensure reliable execution, BMO contracts directly with ISS for electronic proxy voting execution services via their ProxyExchange platform. Through this system and working with custodians and Broadridge, ISS generates electronic ballots for all companies held in client accounts and then processes voted ballots, which are executed through the client's custodial chain. Except for the actual voting decisions, other aspects of vote execution (i.e. ballot delivery, vote processing and certain elements of vote administration) are outsourced to ISS.

Voting administration matters, including client set-up for proxy voting and reporting and ongoing administration of client accounts, are dealt with internally by the GSI team. GSI's Data & Systems and Data & Reporting analysts will liaise as necessary with the clients' custodians and other agents to ensure smooth operation of the voting process. BMO also has access to a large operations support team within ISS who help us resolve any operational/administration issues.

ISS also provides BMO with global proxy voting research, which includes analysis of resolutions. BMO uses ISS research to understand details of companies' proposals. Please note that BMO does not implement ISS' standard voting recommendations, they cast their votes in accordance with voting policies agreed with the client and on the basis of their judgement.

Their voting process uses a risk-based approach to achieve high quality voting while delivering comprehensive coverage of a wide portfolio of stocks. They deploy their specialist governance team on the most complex and sensitive cases and partner with ISS, to deliver voting on the simpler, routine votes through the careful and consistent application of detailed in-house voting policies. In practice, the process works as follows:

Meeting notifications and ballots for clients' accounts will appear in the voting queue on the electronic voting platform used by BMO;

Voting policy will be applied to each shareholder meeting through an automated voting recommendation process;

The voting queue will be checked every morning to determine upcoming votes, particularly those that may require analyst intervention;

All votes designated for analyst intervention in the voting allocation spreadsheet are voted by the team members. This includes large holdings, priority engagement companies, potentially controversial votes, votes on investment matters and issues not covered by voting policies, and shareholder meetings of companies engaged by BMO;

Analysts monitor the voting queue for any votes designated for analyst intervention, and will look at the meeting materials as early as possible to allow sufficient time for research. When analysing the ballot and determining the vote, GSI analysts will:

check the internal database for voting and engagement history to inform current vote;

read proxy research reports on company and review supporting materials (e.g. annual report, CSR report, external reports) for further information on key issues, as relevant;

contact company if clarification is needed to determine vote direction;

determine the intended vote direction and consult with colleagues, fund managers and clients if necessary, particularly in instances where the vote concerns an investment matter or could create controversy. Analysts will also determine if there are any significant ESG issues that go beyond the ballot that should be addressed through engagement outside the annual meeting.

Trained analysts are responsible for voting in each market covered by our voting service;

Automated voting recommendations can be manually overridden any time prior to the cut-off date. If a vote needs to be cast after the cut-off date but prior to the meeting date on a client instruction, ISS will be alerted by BMO to ensure execution of the vote. Their internal "voting policeman" monitors the voting queue and alerts analysts if votes remain outstanding on the cut-off date (e.g. late ballots)

GSI team regularly audits the votes auto-executed under the voting policy to make certain that our voting policies are applied properly by ISS;

Clients who want to monitor voting decisions outside the normal reporting cycle can receive a preview of voting intentions for an entire portfolio or a subset of holdings. BMO can accommodate clients who want to vote, by exception, in a particular way on particular resolutions; this request would need to be triggered by the client. Alternatively, clients can have a "look-through" into the ISS platform.

BMO engages companies before and after general meetings, using their vote to deliver change. At the start of each year, the GSI team sends a copy of its Corporate Governance Guidelines to each investee company, outlining their position and voting strategy for all key governance issues. Through our pre-vote engagement, they highlight the most common governance concerns in each market and invite companies to contact them if there are special circumstances that should be borne in mind when voting at their meetings. After any shareholder meeting, BMO engages companies again to explain the reasons for votes cast in opposition to management; this provides further opportunities to raise key corporate governance and sustainability issues not addressed in the ballot.

Voting is highly integrated with engagement. For priority companies, and for resolutions which are controversial and fall outside BMO's standard voting policy, BMO has governance experts in the team.

LEA 14	Voluntary	Additional Assessed	PRI 2
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Private

LEA 15	Mandatory	Descriptive	PRI 2
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LEA 15.1 Indicate the proportion of votes where you or the service providers acting on your behalf have 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) for selected markets
- Vote(s) for selected sectors
- Vote(s) relating to certain ESG issues
- Vote(s) on companies exposed to controversy on specific ESG issues

- Vote(s) for significant shareholdings
- On request by clients
- Other

LEA 16	Mandatory	Core Assessed	PRI 2
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LEA 16.1 Indicate the proportion of votes participated in within the reporting year in which, you and/or the service provider(s) acting on your behalf, have communicated to companies the rationale for abstaining or voting against management recommendations.

- 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 do not abstain or vote against management recommendations

LEA 16.2 Indicate the reasons your organisation would communicate to companies, the rationale for abstaining or voting against management recommendations.

- Votes for selected markets
- Votes for selected sectors
- Votes relating to certain ESG issues
- Votes on companies exposed to controversy on specific ESG issues
- Votes for significant shareholdings
- On request by clients
- Other

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

- Yes
- No

LEA 17	Mandatory	Core Assessed	PRI 2
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LEA 17.1 For listed equities where you and/or your service provider have the mandate to issue (proxy) voting instructions, indicate the percentage of votes cast during the reporting year.

- We do track or collect this information

Votes cast (to the nearest 1%)	98%
--------------------------------	-----

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

- Shares were blocked
- Notice, ballots or materials not received in 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

LEA 18	Voluntary	Additional Assessed	PRI 2
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LEA 18.1 Indicate if you track the voting instructions that you and/or your service provider on your behalf have issued.

- Yes, we track this information

LEA 18.2 Of the voting instructions that you and/or third parties on your behalf issued, indicate the proportion of ballot items that were:

Voting instructions Breakdown as percentage of votes cast For (supporting) management recommendations

- 69%
- Against (opposing) management recommendations
- 27%
- Abstentions
- 4%

No, we do not track this information

LEA 18.3 In cases where your organisation voted against management recommendations, indicate the percentage of companies you have engaged.

30

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

- Yes
- No

LEA 19.2 Indicate the escalation strategies used at your organisation following abstentions and/or votes against management.

- 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 20	Voluntary	Descriptive	PRI 2
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Private

LEA 21	Voluntary	Descriptive	PRI 2
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Private

PR 01	Mandatory	Core Assessed	PRI 1-6
PR 01.1	Indicate if your organisation has a Responsible Property Investment (RPI) policy.		
<input checked="" type="checkbox"/> Yes			
PR 01.2	Provide a URL or attach the document		
<input checked="" type="checkbox"/> URL https://www.delavastgoed.nl/mvo/voor-elkaar-en-met-elkaar/			
<input type="checkbox"/> Attach Document			
<input type="radio"/> No			
PR 01.3	Provide a brief overview of your organisation's approach to responsible investment in property, and how you link responsible investment in property to your business strategy. [Optional]		
<p>You can download the ESG report on this weblink which is publicly available. Please click on the link and open the PDF. You will find the targets on several pages of the document in the colored text boxes. These targets are in Dutch since the properties, stakeholders and shareholders are all located in the Netherlands. Please view below the targets that are communicated in this document:</p> <p>All targets have the base year 2017 and end year 2020 – or stated otherwise:</p> <ul style="list-style-type: none"> • Perform annual tenant and consumer satisfaction surveys for our shopping center portfolio with the aim of identifying opportunities to improve satisfaction. • Make shopping centers future proof by implementing services and facilities for targeted stakeholders in the catchment areas. • Provide sustainability advice for existing and new tenants and create partnerships regarding sustainability with the top 20 tenants. • Create partnerships with property managers and all suppliers before the end of 2020 ensuring that all products and services respect sustainable criteria. • Achieve higher scores on the employee satisfaction – Great Place to Work (baseline 2016) - the survey includes health & well-being aspects • Sign the IVBN code of ethics twice before 2020 and update the ISAE 3402 certificate • Provide an average of 20 training hours per employees per year • All employees participate with the annual Good Causes day of DELA Vastgoed which will be directly linked with the real estate portfolio • Create 75 residential units above stores before 2020 with the aim to stimulate residents living above shopping areas and creating communities where people can live, meet and shop. • Achieve 15% energy efficiency for the shopping center portfolio between 2016-2020 on a like for like basis • Achieve for minimal 75% of our portfolio the quality mark 'Good accessibility for disabled and partially sighted people' • Reduce carbon emissions for our management organization with 25% between 2014-2020 			

PR 04	Mandatory	Gateway/Core Assessed	PRI 1
PR 04.1	Indicate if your organisation typically incorporates ESG issues when selecting property investments.		
<input checked="" type="checkbox"/> Yes			
PR 04.2	Provide a description of your organisation's approach to incorporating ESG issues in property investment selection.		
<p>The ESG issues are incorporated within the due diligence (DD) procedure that is applied to every new acquisition for DELA Vastgoed. The following items are captured in this DD and thus included in the risk assessment for new acquisitions. (The page numbers below refer to the numbering on the standard checklist).</p> <ul style="list-style-type: none"> • Natural hazards – page 9 section 7.5 includes the risks of natural hazards that have the highest risk of occurring in the Netherlands, namely the risks of floods. <p>This section investigates whether this risk is severe for this property.</p> <p>Building safety and materials – page 2. Section 1.8 checks which Police Standard (safety) there is and if a certification is received for 'Safe Entrepreneurship'.</p> <p>Page 4 section 3.6 addresses the fire safety on-site.</p> <ul style="list-style-type: none"> • Energy efficiency –page 2. Section 1.6, 1.7 and 1.8 describes the EPC certificates that are in place and possible green building certifications and other permits/standards that are in place. • Energy supply –page 6. Section 4.9. An analysis/overview need to be prepared of the energy that is generated on-site through renewable energy sources, that is directly provided towards the property. • Contamination –page 7 section 5.1 addresses the risks that are assessed with regards to asbestos. Section 5.2 addresses contamination of the ground. • Flooding –page 9 section 7.5 addresses the risks for flooding. • Indoor environmental quality –page 6, section 4.3: An overview / analysis needs to be provided of all technical equipment, including HVAC that directly influences the indoor air quality. • Regulatory –page 5 section 3.9 includes all certifications of doors, escalators etc (and page 4 3.8 the inspections of these installations); section 			

3.10 an

overview of all permits used for operations.

•Transportation –page 2 sections 1.1 to 1.4 provides investigates the on-site parking facilities (underground or not) and which transport (roads for cars and bicycles) are in the proximity of the property.

PR 04.3 Indicate which E, S and/or G issues are typically considered by your organisation in the property investment selection process, and list up to three examples per issue.

Environmental

Natural hazards

Environmental example 1, description

includes the risks of natural hazards that have the highest risk of occurring in the Netherlands, namely the risks of floods

Energy efficiency

Environmental example 2, description

describes the EPC certificates that are in place and possible green building certifications and other permits/standards that are in place
Energy supply, Flooding, GHG emissions

Environmental example 3, description

An analysis/overview need to be prepared of the energy that is generated on-site through renewable energy sources, that is directly provided towards the property

Social

Building safety and materials

Social example 1, description [OPTIONAL]

checks which Police Standard (safety) there is and if a certification is received for 'Safe Entrepreneurship'

Health, Safety and wellbeing

Social example 2, description [OPTIONAL]

Contamination addresses the risks that are assessed with regards to asbestos. and contamination of the ground Indoor environmental quality provides an overview / analysis of all technical equipment, including HVAC that directly influences the indoor air quality.

Governance

Anti-bribery & corruption

Governance example 1, description

The following topics are described in our intern policy document (see references made to the page numbers): • Bribery and corruption – see page 66 section 3.1 (omkoping = bribery). This section forbids every employee to engage in bribery and corruption; this is addressed via pre-screening of employees, checking business partners and creating awareness at employees not to engage in sensitive dealings/collaboration (e.g. training, communication etc.) • Data protection and privacy – see page 18-19 on usage of communication tools at DELA. This section describes the policy DELA has regarding the usage of ICT and to ensure • Fraud – page 9 under 'incidents and fraude' where it is clearly described that incidents of fraud occurring at DELA is not accepted. More information is on page 33 section 1.4 where is described what employees should do if they see / identify / suspect any form of fraud and what possible actions they can take. • Political contributions – see page 44-45 section 3C (geschenken/gifts) – This section describes the requirement of respecting the IVBN Internal Code for behavior of employees. In this code it is described that gifts or contributions with political purposes are forbidden. • Whistleblower protection – see page 74-76 section Bijlage 18 (attachment 18) which is communicating the policy regarding 'klokkenluidersregeling' which istranslated in English as whistle blower protection. Included in the policy is in section 1. The policy 2. The purpose of the policy 3. The scope of the policy and applicability for employees 4. Explaining the philosophy of the policy, 5. The principles and the daily implementation, section 6. How to communicate/report any integrity issue, and section 7 who is responsible within DELA on these integrity issues.

Regulatory

Governance example 2, description

includes all certifications of doors, escalators etc and the inspections of these installations and an overview of all permits used for operations

Supply chain governance

No

PR 05	Voluntary	Additional Assessed	PRI 1,3
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Private

PR 06	Mandatory	Core Assessed	PRI 1
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PR 06.1 Indicate if ESG issues impacted your property investment selection process during the reporting year.

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

We do not track this potential impact

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

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

PR 07

Mandatory

Core Assessed

PRI 4

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

Yes

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

Selection process of property managers incorporated ESG issues

Types of actions

- Request explanation of how ESG is effectively integrated, including inquiries about governance and processes
- Request track records and examples of how the manager implements ESG in their asset and property management
- Discuss property level out-performance opportunities through greater integration of ESG criteria
- Request explanation of engaging stakeholders on ESG issues
- Other, explain

Coverage

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

Contractual requirements when appointing property managers includes ESG issues

Types of actions

- Include clear and detailed expectations for incorporating ESG
- Require dedicated ESG procedures in all relevant asset and property management phases
- Clear ESG reporting requirements
- Clear ESG performance targets
- Other, explain

Coverage

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

Monitoring of property managers covers ESG responsibilities and implementation

Types of actions

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

Coverage

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

No

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

The selection of external property managers is subject to strict ESG requirements. In the RFP's we have asked in detail how property managers address ESG issues. When evaluating the responses ESG is one of the items in the scorecard that we use. Hence a higher score on this makes it more likely the manager is selected. In the property management contract and manual there are several KPI's concerning ESG issues.

PR 08	Mandatory	Gateway	PRI 2
PR 08.1	Indicate if your organisation, and/or property managers, considers ESG issues in post-investment activities relating to your property assets.		
<input checked="" type="checkbox"/> Yes			
PR 08.2	Indicate whether your organisation, and/or property managers, considers ESG issues in the following post-investment activities relating to your property assets.		
<input checked="" type="checkbox"/> We consider ESG issues in property monitoring and management <input checked="" type="checkbox"/> We consider ESG issues in property developments and major renovations. <input checked="" type="checkbox"/> We consider ESG issues in property occupier engagements <input checked="" type="checkbox"/> We consider ESG issues in community engagements related to our properties <input type="checkbox"/> We consider ESG issues in other post-investment activities, specify			
PR 08.3	Describe how your organisation, and/or property managers, considers ESG issues in post-investment activities related to your property assets.		
<p>We take ESG issues into account as part of our regular property management and monitoring process. We make energy efficient choices and use sustainable materials with a longer lifetime.</p> <p>Next to that, we also involve the local community with redevelopment works to our assets.</p>			
<input type="checkbox"/> No			

PR 09	Mandatory	Core Assessed	PRI 2,3						
PR 09.1	Indicate the proportion of property assets for which your organisation, and/or property managers, set and monitored ESG targets (KPIs or similar) during the reporting year.								
<input type="checkbox"/> >90% of property assets <input checked="" type="checkbox"/> 51-90% of property assets <input type="checkbox"/> 10-50% of property assets <input type="checkbox"/> <10% of property assets									
PR 09.2	Indicate which ESG targets your organisation and/or property managers typically set and monitor								
<input checked="" type="checkbox"/> Environmental									
<table border="1"> <thead> <tr> <th>Target/KPI</th> <th>Progress Achieved</th> </tr> </thead> <tbody> <tr> <td>15% electricity reduction like-for-like (2016-2020)</td> <td>- 6.24% (2016-2017)</td> </tr> <tr> <td>25% CO2 emission reduction management organisation (2014-2020)</td> <td>- 29,5% (2014-2018)</td> </tr> </tbody> </table>				Target/KPI	Progress Achieved	15% electricity reduction like-for-like (2016-2020)	- 6.24% (2016-2017)	25% CO2 emission reduction management organisation (2014-2020)	- 29,5% (2014-2018)
Target/KPI	Progress Achieved								
15% electricity reduction like-for-like (2016-2020)	- 6.24% (2016-2017)								
25% CO2 emission reduction management organisation (2014-2020)	- 29,5% (2014-2018)								
<input type="checkbox"/> Social <input type="checkbox"/> Governance <input type="checkbox"/> We do not set and/or monitor against targets									
PR 09.3	Additional information. [Optional]								
<p>We make use of 2 property managers that are evaluated quarterly on their energy consumption and they play an important role in evaluation tenant satisfaction surveys</p>									

PR 10	Voluntary	Descriptive	PRI 2
Private			

PR 11	Mandatory	Core Assessed	PRI 2
PR 11.1	Indicate the proportion of active property developments and major renovations where ESG issues have been considered.		
<input checked="" type="checkbox"/> >90% of active developments and major renovations <input type="checkbox"/> 51-90% of active developments and major renovations <input type="checkbox"/> 10-50% of active developments and major renovations <input type="checkbox"/> <10% of active developments and major renovations <input type="checkbox"/> N/A, no developments and major renovations of property assets are active			
PR 11.2	Indicate if the following ESG considerations are typically implemented and monitored in your property developments and major renovations.		
<input checked="" type="checkbox"/> Environmental site selection requirements <input checked="" type="checkbox"/> Environmental site development requirements <input checked="" type="checkbox"/> Sustainable construction materials <input checked="" type="checkbox"/> Water efficiency requirements <input checked="" type="checkbox"/> Energy efficiency requirements <input type="checkbox"/> Energy generation from on-site renewable sources			

- Waste management plans at sites
- Health and safety management systems at sites
- Health and wellbeing of residents
- Construction contractors comply with sustainability guidelines
- Resilient building design and orientation
- Other, specify

PR 12	Mandatory	Core Assessed	PRI 2
PR 12.1	Indicate the proportion of property occupiers your organisation, and/or your property managers, engaged with on ESG issues during the reporting year.		
<input type="radio"/> >90% of occupiers <input checked="" type="radio"/> 50-90% of occupiers <input type="radio"/> 10-50% of occupiers <input type="radio"/> <10% of occupiers			
PR 12.2	Indicate if the following practises and areas are typically part of your, and/or your property managers', occupier engagements.		
<input checked="" type="checkbox"/> Distribute a sustainability guide to occupiers <input type="checkbox"/> Organise occupier events focused on increasing sustainability awareness <input type="checkbox"/> Deliver training on energy and water efficiency <input type="checkbox"/> Deliver training on waste minimisation <input checked="" type="checkbox"/> Provide feedback on energy and water consumption and/or waste generation <input checked="" type="checkbox"/> Provide feedback on waste generation <input checked="" type="checkbox"/> Carry out occupier satisfaction surveys <input type="checkbox"/> Health and wellbeing of residents <input checked="" type="checkbox"/> Offer green leases <input type="checkbox"/> Other, specify			
PR 13	Voluntary	Additional Assessed	PRI 2
<i>Private</i>			
PR 14	Voluntary	Additional Assessed	PRI 2
<i>Private</i>			
PR 15	Voluntary	Additional Assessed	PRI 1,2
<i>Private</i>			

CM1 01	Mandatory	Additional Assessed	General								
CM1 01.1	Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:										
<input type="checkbox"/> Third party assurance over selected responses from this year's PRI Transparency Report <input type="checkbox"/> Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year <input type="checkbox"/> Third party assurance or audit of the correct implementation of RI processes (that have been reported to the PRI this year) <input type="checkbox"/> Internal audit of the correct implementation of RI processes and/or accuracy of RI data (that have been reported to the PRI this year) <input checked="" type="checkbox"/> Internal verification of responses before submission to the PRI (e.g. by the CEO or the board) <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Whole PRI Transparency Report has been internally verified <input type="checkbox"/> Selected data has been internally verified <input checked="" type="checkbox"/> Other, specify Our service provider BMO GAM has reviewed the entire response. <input type="checkbox"/> None of the above											
CM1 02	Mandatory	Descriptive	General								
CM1 02.1	We undertook third party assurance on last year's PRI Transparency Report										
<input type="radio"/> Whole PRI Transparency Report was assured last year <input type="radio"/> Selected data was assured in last year's PRI Transparency Report <input checked="" type="radio"/> We did not assure last year's PRI Transparency report <input type="radio"/> None of the above, we were in our preparation year and did not report last year.											
CM1 03	Mandatory	Descriptive	General								
CM1 03.1	We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:										
<input type="checkbox"/> We adhere to an RI certification or labelling scheme <input type="checkbox"/> We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report <input type="checkbox"/> ESG audit of holdings <input type="checkbox"/> Other, specify <input checked="" type="checkbox"/> None of the above											
CM1 04	Mandatory	Descriptive	General								
CM1 04.1	Do you plan to conduct third party assurance of this year's PRI Transparency report?										
<input type="radio"/> Whole PRI Transparency Report will be assured <input type="radio"/> Selected data will be assured <input checked="" type="radio"/> We do not plan to assure this year's PRI Transparency report											
CM1 07	Mandatory	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										
<input checked="" type="checkbox"/> CEO or other Chief-Level staff <table border="1" style="margin-left: 20px;"> <tr> <td colspan="2">Sign-off or review of responses</td> </tr> <tr> <td><input checked="" type="checkbox"/> Sign-off</td> <td><input type="checkbox"/> Review of responses</td> </tr> </table> <input type="checkbox"/> The Board <input checked="" type="checkbox"/> Investment Committee <table border="1" style="margin-left: 20px;"> <tr> <td colspan="2">Sign-off or review of responses</td> </tr> <tr> <td><input type="checkbox"/> Sign-off</td> <td><input checked="" type="checkbox"/> Review of responses</td> </tr> </table> <input type="checkbox"/> Compliance Function <input type="checkbox"/> RI/ESG Team <input type="checkbox"/> Investment Teams <input type="checkbox"/> Legal Department <input type="checkbox"/> Other (specify)				Sign-off or review of responses		<input checked="" type="checkbox"/> Sign-off	<input type="checkbox"/> Review of responses	Sign-off or review of responses		<input type="checkbox"/> Sign-off	<input checked="" type="checkbox"/> Review of responses
Sign-off or review of responses											
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