



# RITRANSPARENCY REPORT 2020

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

### **Understanding the Principles Index**

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

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

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

Symbol	Status
<b>✓</b>	The signatory has completed all mandatory parts of this indicator
Ø	The signatory has completed some parts of this indicator
6	This indicator was not relevant for this signatory
-	The signatory did not complete any part of this indicator
Ъ	The signatory has flagged this indicator for internal review

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



# Principles Index



Organisa	ational Overview				Р	rin		General		
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
00 TG		8	n/a							
OO 01	Signatory category and services	✓	Public							✓
OO 02	Headquarters and operational countries	✓	Public							✓
OO 03	Subsidiaries that are separate PRI signatories	✓	Public							✓
OO 04	Reporting year and AUM	✓	Public							✓
OO 05	Breakdown of AUM by asset class	~	Asset mix disclosed in OO 06							<b>✓</b>
OO 06	How would you like to disclose your asset class mix	✓	Public							<b>✓</b>
OO 07	Fixed income AUM breakdown	✓	Private							✓
00 08	Segregated mandates or pooled funds	✓	Private							✓
OO 09	Breakdown of AUM by market	✓	Public							<b>✓</b>
OO 10	Active ownership practices for listed assets	✓	Public							<b>✓</b>
00 11	ESG incorporation practices for all assets	✓	Public							✓
OO 12	Modules and sections required to complete	✓	Public							<b>✓</b>
OO LE 01	Breakdown of listed equity investments by passive and active strategies	8	n/a							✓
OO LE 02	Reporting on strategies that are <10% of actively managed listed equities	8	n/a							✓
OO FI 01	Breakdown of fixed income investments by passive and active strategies	✓	Public							✓
OO FI 02	Reporting on strategies that are <10% of actively managed fixed income	8	n/a							<b>✓</b>
OO FI 03	Fixed income breakdown by market and credit quality	✓	Public							✓
OO SAM 01	Breakdown of externally managed investments by passive and active strategies	✓	Private							<b>✓</b>
OO PE 01	Breakdown of private equity investments by strategy	8	n/a							✓
OO PE 02	Typical level of ownership in private equity investments	8	n/a							✓
00 PR 01	Breakdown of property investments	✓	Private							<b>✓</b>
00 PR 02	Breakdown of property assets by management	✓	Private							<b>✓</b>
00 PR 03	Largest property types	✓	Private							<b>✓</b>
00 INF 01	Breakdown of infrastructure investments	8	n/a							✓
OO INF 02	Breakdown of infrastructure assets by management	8	n/a							✓
00 INF 03	Largest infrastructure sectors	8	n/a	Ш						✓
OO HF 01	Breakdown of hedge funds investments by strategies	8	n/a	Ш						✓
OO End	Module confirmation page	✓	-							

CCStrate	CCStrategy and Governance					rin	General			
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
SG 01	RI policy and coverage	✓	Public							✓
SG 01 CC	Climate risk	✓	Private							✓
SG 02	Publicly available RI policy or guidance documents	✓	Public						✓	
SG 03	Conflicts of interest	✓	Public							✓
SG 04	Identifying incidents occurring within portfolios	✓	Private							✓
SG 05	RI goals and objectives	✓	Public							✓
SG 06	Main goals/objectives this year	✓	Private							✓
SG 07	RI roles and responsibilities	✓	Public							✓
SG 07 CC	Climate-issues roles and responsibilities	✓	Private							✓
SG 08	RI in performance management, reward and/or personal development	✓	Private							✓
SG 09	Collaborative organisations / initiatives	✓	Public				✓	✓		
SG 09.2	Assets managed by PRI signatories	✓	Private	✓						
SG 10	Promoting RI independently	✓	Public				✓			
SG 11	Dialogue with public policy makers or standard setters	✓	Private				✓	✓	✓	
SG 12	Role of investment consultants/fiduciary managers	✓	Public				✓			
SG 13	ESG issues in strategic asset allocation	✓	Public	✓						
SG 13 CC		✓	Private							✓
SG 14	Long term investment risks and opportunity	✓	Private	~						
SG 14 CC		✓	Private							✓
SG 15	Allocation of assets to environmental and social themed areas	✓	Private	<b>✓</b>						
SG 16	ESG issues for internally managed assets not reported in framework	✓	Public							✓
SG 17	ESG issues for externally managed assets not reported in framework	8	n/a							✓
SG 18	Innovative features of approach to RI	✓	Private							✓
SG 19	Communication	✓	Public		<b>✓</b>				<b>✓</b>	
SG End	Module confirmation page	✓	-							

Indirect -	Indirect – Manager Selection, Appointment and Monitoring						Principle					
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6			
SAM 01	ESG incorporation strategies	✓	Public	✓								
SAM 02	Selection processes (LE and FI)	✓	Public	✓								
SAM 03	Evaluating engagement and voting practices in manager selection (listed equity/fixed income)	8	n/a		~							
SAM 04	Appointment processes (listed equity/fixed income)	✓	Public	~								
SAM 05	Monitoring processes (listed equity/fixed income)	✓	Public	<b>✓</b>								
SAM 06	Monitoring on active ownership (listed equity/fixed income)	8	n/a	<b>✓</b>								
SAM 07	Percentage of (proxy) votes	8	n/a		✓							
SAM 08	Percentage of externally managed assets managed by PRI signatories	✓	Private	~								
SAM 09	Examples of ESG issues in selection, appointment and monitoring processes	✓	Public	~					<b>✓</b>			
SAM End	Module confirmation page	✓	-									

Direct - L	isted Equity Active Ownership				Principle					General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
LEA 01	Description of approach to engagement	✓	Public		✓					
LEA 02	Reasoning for interaction on ESG issues	✓	Public	✓	✓	✓				
LEA 03	Process for identifying and prioritising engagement activities	✓	Public		✓					
LEA 04	Objectives for engagement activities	✓	Public		<b>✓</b>					
LEA 05	Process for identifying and prioritising collaborative engagement	✓	Public		✓					
LEA 06	Role in engagement process	✓	Public		✓		✓			
LEA 07	Share insights from engagements with internal/external managers	✓	Public	<b>✓</b>	✓					
LEA 08	Tracking number of engagements	✓	Public		✓					
LEA 09	Number of companies engaged with, intensity of engagement and effort	✓	Private		✓					
LEA 10	Engagement methods	✓	Private		✓					
LEA 11	Examples of ESG engagements	✓	Private		✓					
LEA 12	Typical approach to (proxy) voting decisions	✓	Public		✓					
LEA 13	Percentage of voting recommendations reviewed	8	n/a		✓					
LEA 14	Securities lending programme	✓	Private		✓					
LEA 15	Informing companies of the rationale of abstaining/voting against management	✓	Public		✓					
LEA 16	Informing companies of the rationale of abstaining/voting against management	✓	Public		✓					
LEA 17	Percentage of (proxy) votes cast	✓	Public		✓					
LEA 18	Proportion of ballot items that were for/against/abstentions	✓	Public		✓					
LEA 19	Proportion of ballot items that were for/against/abstentions	✓	Public		✓					
LEA 20	Shareholder resolutions	✓	Private		✓					
LEA 21	Examples of (proxy) voting activities	✓	Private		<b>✓</b>					
LEA End	Module confirmation page	✓								

Direct - F	Direct - Property						cip	le		General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
PR 01	Responsible Property Investment (RPI) policy	✓	Public	✓					✓	
PR 02	Fund placement documents and RI	8	n/a	✓			✓		✓	
PR 03	Formal commitments to RI	8	n/a				✓			
PR 04	Incorporating ESG issues when selecting investments	✓	Public	~						
PR 05	Types of ESG information considered in investment selection	8	n/a	<b>✓</b>		✓				
PR 06	ESG issues impact in selection process	8	n/a	<b>✓</b>						
PR 07	ESG issues in selection, appointment and monitoring of third-party property managers	<b>✓</b>	Public				~			
PR 08	ESG issues in post-investment activities	✓	Public		✓					
PR 09	Proportion of assets with ESG targets that were set and monitored	✓	Public		✓	✓				
PR 10	Certification schemes, ratings and benchmarks	✓	Private		✓					
PR 11	Proportion of developments and refurbishments where ESG issues were considered	✓	Public		~					
PR 12	Proportion of property occupiers that were engaged with	✓	Public		✓					
PR 13	Proportion of green leases or MOUs referencing ESG issues	✓	Private		✓					
PR 14	Proportion of assets engaged with on community issues	✓	Private		✓					
PR 15	ESG issues affected financial/ESG performance	✓	Private	✓	✓					
PR 16	Examples of ESG issues that affected your property investments	-	n/a	<b>✓</b>		✓				
PR End	Module confirmation page	✓	-							

Confidence building measures					Р	rin	General			
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
CM1 01	Assurance, verification, or review	✓	Public							✓
CM1 02	Assurance of last year`s PRI data	✓	Public							✓
CM1 03	Other confidence building measures	✓	Public							✓
CM1 04	Assurance of this year`s PRI data	✓	Public							✓
CM1 05	External assurance	8	n/a							✓
CM1 06	Assurance or internal audit	8	n/a							✓
CM1 07	Internal verification	✓	Public							✓
CM1 01 End	Module confirmation page	✓	-							



# Coöperatie DELA

**Reported Information** 

Public version

Organisational Overview

### PRI disclaimer

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# Basic information OO 01 Mandatory Public Gateway/Peering General OO 01.1 Select the type that best describes your organisation or the services you provide. O 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

OO 01.3 Additional information. [Optional]

Family officeOther, specify

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	Mar	ndatory	Public	Peering	General
00 0	2.1	Select the location of your organisa	tion's headquarters	5.	
Neth	erlands				
00 0	2.2	Indicate the number of countries in	which you have off	ices (including your headquarters	s).
0 1					
⊚ 2-	5				
○ 6-	10				
○ >1	0				
00 0	2.3	Indicate the approximate number of	staff in your organ	isation in full-time equivalents (F	TE).
		FTE			
1530					
OO 03	Mar	ndatory	Public	Descriptive	General



00 03.1

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

○ Yes

No

000	4	Mar	ndatory	Public	Gateway/Peering	General
	OO 04.	.1	Indicate the year end date for your	reporting year.		
	31/12/2	2019				
	OO 04.	.2	Indicate your total AUM at the end of	of your reporting ye	ear.	

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

	trillions	billions	millions	thousands	hundreds
Total AUM		6	307	000	000
Currency	EUR				
Assets in USD		6	952	214	282

 $<sup>\</sup>hfill\square$  Not applicable as we are in the fund-raising process



OO 06 Mandatory Public Descriptive General

OO 06.1

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

 $\bigcirc$  as percentage breakdown

as broad ranges

	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 06.2	Publish asset class mix as per attached image [Optional].
OO 06.3	Indicate whether your organisation has any off-balance sheet assets [Optional].
00 06.3	indicate whether your organisation has any on-balance sheet assets [Optional].
○ Yes	
○ No	
OO 06.5	Indicate whether your organisation uses fiduciary managers.

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

OO 09	Mand	atory	Public	Peering	General
00 09	9.1	Indicate the breakdown of your orga	anisation's AUM by	market.	
		Developed Markets			
82					
		Emerging Markets			
18					
		Frontier Markets			
0					
		Other Markets			
0					
		Total 100%			
100%	)				

	Asset class implementation gateway indicators					
00 10		Mandatory		Public	Gateway	General
	00 10.1 Sele		Select the active ownership activities	es your organisation	n implemented in the reporting ye	ar.



	Listed equity – engagement					
☑ We enga	ge with companies on ESG factors	via our staff, collab	orations or service providers.			
☐ We requi	$\square$ We require our external managers to engage with companies on ESG factors on our behalf.					
□ We do no	ot engage directly and do not requir	e external manager	s to engage with companies on E	SG factors.		
	Listed equity – voting					
☑ We cast	our (proxy) votes directly or via ded	licated voting provid	lers			
☐ We requi	re our external managers to vote o	n our behalf.				
□ We do no	ot cast our (proxy) votes directly an	d do not require ext	ernal managers to vote on our be	half		
	Fixed income SSA – engagem	ent				
☑ We en	gage with SSA bond issuers on ES	G factors via our st	aff, collaborations or service provi	ders.		
□ We re	quire our external managers to eng	age with SSA bond	issuers on ESG factors on our be	half.		
	not engage directly and do not req ors. Please explain why you do not		gers to engage with SSA bond iss	uers on		
	Fixed income Corporate (finan	cial) – engagement				
☑ We en	gage with companies on ESG factor	ors via our staff, coll	aborations or service providers.			
□ We re	$\square$ We require our external managers to engage with companies on ESG factors on our behalf.					
	not engage directly and do not requested and long requested and long.	uire external manaç	gers to engage with companies or	i ESG		
	Fixed income Corporate (non-	financial) – engager	ment			
☑ We en	gage with companies on ESG factor	ors via our staff, coll	aborations or service providers.			
□ We re	quire our external managers to eng	age with companies	on ESG factors on our behalf.			
	not engage directly and do not require explain why you do not.	uire external manaç	gers to engage with companies or	ı ESG		
Mand	atory	Public	Gateway	General		
20.44.4	Select the internally managed asset	et classes in which y	you addressed ESG incorporation	into your		
00 11.1	investment decisions and/or your a					
	Fixed income - corporate (financ	ial)				
	ess ESG incorporation.					
○ We do no	ot do ESG incorporation.					
	Fixed income - corporate (non-fi	nancial)				
	We address ESG incorporation.					



 $\bigcirc$  We do not do ESG incorporation.

### Property

- We address ESG incorporation.
- $\bigcirc$  We do not do ESG incorporation.

00 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	
	Listed equity - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes
	☑ We incorporate ESG into our external manager selection process
	☑ We incorporate ESG into our external manager appointment process
	☑ We incorporate ESG into our external manager monitoring process
	☐ We do not do ESG incorporation
Fixed income - SSA	
	Fixed income - SSA - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes
	☑ We incorporate ESG into our external manager selection process
	☑ We incorporate ESG into our external manager appointment process
	☑ We incorporate ESG into our external manager monitoring process
	☐ We do not do ESG incorporation
Fixed income - corporate	
financial)	Fixed income - corporate (financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes
	☑ We incorporate ESG into our external manager selection process
	☑ We incorporate ESG into our external manager appointment process
	☑ We incorporate ESG into our external manager monitoring process
	☐ We do not do ESG incorporation
ixed income - corporate	
non-financial)	Fixed income - corporate (non-financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes
	☑ We incorporate ESG into our external manager selection process
	☑ We incorporate ESG into our external manager appointment process
	☑ We incorporate ESG into our external manager monitoring process
	$\square$ We do not do ESG incorporation
Property	
	Property - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes
	☑ We incorporate ESG into our external manager selection process
	☑ We incorporate ESG into our external manager appointment process
	☑ We incorporate ESG into our external manager monitoring process
	$\square$ We do not do ESG incorporation



Infrastructure - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes

☑ We incorporate ESG into our external manager selection process
☑ We incorporate ESG into our external manager appointment process
☑ We incorporate ESG into our external manager monitoring process
☑ We do not do ESG incorporation

00 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.

00 12 **Public** General **Mandatory Gateway** 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. 00 12.1 Those which are voluntary to report on can be opted into by ticking the box. Core modules ☑ Organisational Overview RI implementation directly or via service providers ☑ Engagements ☑ (Proxy) voting Direct - Fixed Income ☐ Fixed income - Corporate (financial) ☐ Fixed income - Corporate (non-financial) ☑ Property RI implementation via external managers



Indirect - Selection, Appointment and Monitoring of External Managers

- ☑ Listed Equities
- ☑ Fixed income SSA
- ☑ Fixed income Corporate (financial)
- ☑ Fixed income Corporate (non-financial)
- ☑ Property
- ✓ Infrastructure

Closing module

☑ Closing module

### **Peering questions**

OO FI 01

Mandatory to Report Voluntary to Disclose

**Public** 

Gateway

General

OO FI 01.1

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



Corporate (financial)		Passive
	17	
		Active - quantitative (quant)
	0	
		Active - fundamental and active - other
	83	
		Total
	100%	
Corporate (non- financial)		Passive
Tinancial)	32	
		Active - quantitative (quant)
	0	
		Active - fundamental and active - other
	68	
		Total
	100%	

# Coöperatie DELA

**Reported Information** 

Public version

Strategy and Governance

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### **Investment policy**

SG 01 Mandatory Public Core Assessed General

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

SG 01.1

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

Yes

SG 01.2

Indicate the components/types and coverage of your policy.

### Select all that apply

Policy components/types	Coverage by AUM
☑ Policy setting out your overall approach	Applicable policies cover all AUM
☑ Formalised guidelines on environmental factors	O Applicable policies cover a majority of AUM
☐ Formalised guidelines on social factors	O Applicable policies cover a minority of AUM
☑ Formalised guidelines on corporate governance factors	
☐ Fiduciary (or equivalent) duties	
☐ Asset class-specific RI guidelines	
☐ Sector specific RI guidelines	
☑ Screening / exclusions policy	
☑ Engagement policy	
☑ (Proxy) voting policy	
☐ Other, specify (1)	
☐ Other, specify(2)	



SG 01.3	Indicate if the investment policy covers any of the following					
☑ Your organisation's definition of ESG and/or responsible investment and it's relation to investments						
☑ Your investment objectives that take ESG factors/real economy influence into account						
☑ Time hori	zon of your investment					
	nce structure of organisational ESG responsibilities					
☑ ESG inco	rporation approaches					
	nership approaches					
☑ Reporting						
☑ Climate change						
☐ Understanding and incorporating client / beneficiary sustainability preferences						
☐ Other RI	considerations, specify (1)					
☐ Other RI considerations, specify (2)						

SG 01.4

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

The 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 specicific 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]

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 specicific policy on responsible investment.

 $\bigcirc$  No

SG 02 Mandatory Public Core Assessed PRI 6

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

SG 02.1

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

 $\ensuremath{\square}$  Policy setting out your overall approach

**URL/Attachment** 

**☑** URL



URL

https://www.dela.nl/-/media/files/corporate/181203 mvb-beleid-2018.pdf

☐ Attachment (will be made public)
The manufact of an idealing a company decrease at a factor of
☐ Formalised guidelines on environmental factors
URL/Attachment
☑ URL
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
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
URL
https://www.dela.nl/-/media/files/corporate/2019-bmo-global-asset-management-verantwoordbeleggenaanpak.pdf
☐ Attachment (will be made public)
☑ (Proxy) voting policy
URL/Attachment
✓ URL



URL https://www.dela.nl/-/media/files/corporate/stembeleid-coöperatie-dela.pdf ☐ Attachment (will be made public)  $\square$  We do not publicly disclose our investment policy documents Indicate if any of your investment policy components are publicly available. Provide URL and an SG 02.2 attachment of the document.  $\ensuremath{\,\boxtimes\,}$  Your organisation's definition of ESG and/or responsible investment and it's relation to investments **URL/Attachment ☑** URL URL https://www.dela.nl/-/media/files/corporate/181203\_mvb-beleid-2018.pdf ☐ Attachment  $\square$  Your investment objectives that take ESG factors/real economy influence into account ☑ Time horizon of your investment **URL/Attachment ☑** URL **URL** https://www.dela.nl/-/media/files/corporate/181203\_mvb-beleid-2018.pdf □ Attachment ☑ Governance structure of organisational ESG responsibilities **URL/Attachment** 

**☑** URL

URL

https://www.dela.nl/-/media/files/corporate/181203\_mvb-beleid-2018.pdf

☐ Attachment

☑ ESG incorporation approaches



			URL/Attachment			
	v	I URL				
			URL			
		https://w	ww.dela.nl/-/media/files/corporate	e/181203_mvb-bele	i <u>d-2018.pdf</u>	
		] Attachm	ent			
[	☑ Act	ve owners	ship approaches			
			URL/Attachment			
	v	I URL				
			URL			
		https://w	ww.dela.nl/-/media/files/corporate	e/2019-hmo-global-a	asset-management-	
		verantwo	oordbeleggenaanpak.pdf	72010 Sillo global d	asset management	
		Attachm	ent			
[	☑ Rep	oorting				
			URL/Attachment			
	v	I URL				
			URL			
			ww.dela.nl/over-dela/over-cooper	ratie-dela/governand	ce/ons-beleid/maatschappelijk-ve	erantwoord-
		belegger	<u>n</u>			
ſ		Attachmonate chang				
			blicly disclose any investment po	licy components		
G 03		Mandat	tory	Public	Core Assessed	General
					make a still a sufficiency of instrument in all	
5	SG 03		ndicate if your organisation has a evestment process.	policy on managing	potential conflicts of interest in tr	ne
	○ Yes No	i				
,	UNU					
	Objed	tives an	d strategies			
G 05		Mandat	tory	Public	Gateway/Core Assessed	General



SG 05.1

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

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

SG 05.2

Additional information. [Optional

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.

Gov	ernanc	e and human resources			
G 07	Man	adatory	Public	Core Assessed	General
SG 07.1 Indicate the internal and/or external roles used by your organ they have oversight and/or implementation responsibilities for			ach whether		
		Roles			
<b>V</b>	☑ Board members or trustees				
	☑ Oversight/accountability for responsible investment				
	☐ Implementation of responsible investment				
	$\hfill \square$ No oversight/accountability or implementation responsibility for responsible investment				
$\checkmark$	✓ Internal Roles (triggers other options)				



		Select from the below interna	l roles		
		ecutive Officer (CEO), Chief Inv Committee	estment Officer (C	O), Chief Operating Officer (COC	O),
	☑ Oversight/accountability for responsible investment				
	☑ Implementation of responsible investment				
☐ No oversight/accountability or implementation responsible			sibility for responsible investment		
	☐ Other Chief-level staff or head of department, specify				
	☑ Portfolio managers				
	☑ Ove	ersight/accountability for respon	sible investment		
	☑ Imp	lementation of responsible inve	stment		
	□ No	oversight/accountability or imple	ementation respons	sibility for responsible investment	
	☐ Investme	ent analysts			
	□ Dedicate	ed responsible investment staff			
	☐ Investor	relations			
	☐ Other rol	le, specify (1)			
	☐ Other rol	le, specify (2)			
$\checkmark$	☑ External managers or service providers				
	✓ Oversight/accountability for responsible investment				
	☑ Implementation of responsible investment				
	☐ No overs	sight/accountability or implemen	tation responsibility	for responsible investment	
SG (		the roles for which you have RI cate how you execute these res		bility or implementation responsil	oilities,
integra Portfol	tion. They are to analysts and	also the main contributors to the	e development of the consible for selecting	sourcing of engagement, voting a ne organisation's RI strategy and external managers who integrate ave signed the UN PRI.	policies.
SG (	SG 07.3 Indicate the number of dedicated responsible investment staff your organisation has.				
	Nu	umber			
1					
Pro	moting resp	onsible investment			
SG 09	Mandator	V	Public	Core Assessed	PRI 4,5

Select all that apply

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.

 $\ensuremath{\,\boxtimes\,}$  Principles for Responsible Investment

Your organisation's role in the initiative during the reporting period (see definitions)					
□ Basic					
☑ Moderate					
☐ Advanced					
☐ Asian Corporate Governance Association					
☐ Australian Council of Superannuation Investors					
□ AVCA: Sustainability Committee					
☐ France Invest – La Commission ESG					
□ BVCA – Responsible Investment Advisory Board					
☐ CDP Climate Change					
□ CDP Forests					
□ CDP Water					
☐ CFA Institute Centre for Financial Market Integrity					
☐ Climate Action 100+					
☐ Code for Responsible Investment in SA (CRISA)					
☐ Council of Institutional Investors (CII)					
□ Eumedion					
☐ Extractive Industries Transparency Initiative (EITI)					
☐ ESG Research Australia					
☐ Invest Europe Responsible Investment Roundtable					
☐ Global Investors Governance Network (GIGN)					
☐ Global Impact Investing Network (GIIN)					
☑ Global Real Estate Sustainability Benchmark (GRESB)					
Your organisation's role in the initiative during the reporting period (see definitions)					
☑ Basic					
☐ Moderate					
☐ Advanced					
☑ Green Bond Principles					



Your organisation's role in	the initiative during t	he reporting period (see definit	ons)
☑ Basic			
☐ Moderate			
☐ Advanced			
☐ HKVCA: ESG Committee			
☐ Institutional Investors Group on Climate Cl	nange (IIGCC)		
☐ Interfaith Center on Corporate Responsibil	ity (ICCR)		
☐ International Corporate Governance Netwo	ork (ICGN)		
☐ Investor Group on Climate Change, Austra	alia/New Zealand (IG	CC)	
☐ International Integrated Reporting Council	(IIRC)		
☐ Investor Network on Climate Risk (INCR)/0	CERES		
☐ Local Authority Pension Fund Forum			
$\hfill\Box$ Principles for Financial Action in the 21st C	Century		
☐ Principles for Sustainable Insurance			
☐ Regional or National Social Investment Fo	rums (e.g. UKSIF, Eu	urosif, ASRIA, RIAA), specify	
☐ Responsible Finance Principles in Inclusive	e Finance		
☐ Shareholder Association for Research and	Education (Share)		
☐ United Nations Environmental Program Fir	nance Initiative (UNE	P FI)	
☑ United Nations Global Compact			
Your organisation's role in	the initiative during t	he reporting period (see definit	ions)
☑ Basic			
☐ Moderate			
☐ Advanced			
$\ensuremath{\boxtimes}$ Other collaborative organisation/initiative,	specify		
ILO, Governance Code and IMVO-conven-	ant van Verbond van	Verzekeraars	
Your organisation's role in	the initiative during t	he reporting year (see definitio	ns)
☑ Basic			. /
☐ Moderate			
☐ Advanced			
☐ Other collaborative organisation/initiative,	enecify		
☐ Other collaborative organisation/initiative, s			
☐ Other collaborative organisation/initiative, s			
- Other conaborative organisation/initiative, v	эрсопу		
Mandatory	Public	Core Assessed	PRI 4
			Hala a seed
SG 10.1 Indicate if your organisation prinitiatives.	omotes responsible i	nvestment, independently of co	llaborative
⊚ Yes			



SG 10.2

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

☑ Provided or supported education or training programmes (this includes peer to peer RI support) Your education or training may be for clients, investment managers, actuaries, broker/dealers, investment consultants, legal advisers etc.)

BMO facilitates dialogue on responsible investing for clients, webinars accessible to clients as well as investee companies

Frequency of contribution

	O Quarterly or more frequently
	○ Biannually
	O Less frequently than annually
	○ Ad hoc
	Other
□ F	Provided financial support for academic or industry research on responsible investment
□ F	Provided input and/or collaborated with academia on RI related work
	Encouraged better transparency and disclosure of responsible investment practices across the investment ustry

Description

Description

Through encouraging the adoption of stewardship principles/codes across various jurisdictions.

Frequency of contribution

- Quarterly or more frequently
- O Biannually
- Annually
- Less frequently than annually
- $\bigcirc \; \mathsf{Ad} \; \mathsf{hoc}$
- Other
- $\hfill \square$  Spoke publicly at events and conferences to promote responsible investment
- $\hfill\square$  Wrote and published in-house research papers on responsible investment
- $\ensuremath{\,\boxtimes\,}$  Encouraged the adoption of the PRI

Description

Through engagement by BMO with companies we invest in and by requiring asset managers to be UN PRI signatories.



		Frequency of contribution			
	<ul><li>Quarterly</li></ul>	y or more frequently			
	O Biannua	lly			
	<ul><li>Annually</li></ul>	1			
	O Less free	quently than annually			
	O Ad hoc				
	Other				
$\checkmark$	Responded to	RI related consultations by	non-governme	ntal organisations (OECD, FSB etc	)
		Description			
				seek to be a constructive investor of ESG risks faced by the companie	
		Frequency of contribution			
	<ul><li>Quarterly</li></ul>	y or more frequently			
	O Biannua	lly			
	<ul><li>Annually</li></ul>	1			
	O Less free	quently than annually			
	O Ad hoc				
	○ Other				
	Wrote and pu	blished articles on responsil	ble investment i	n the media	
	A member of	PRI advisory committees/ w	orking groups, s	specify	
	On the Board	of, or officially advising, oth	er RI organisation	ons (e.g. local SIFs)	
	Other, specify	/			
○ No					
Outso	urcing to fid	luciary managers and ir	ivestment co	nsultants	
SG 12	Mandatory		Public	Core Assessed	PRI 4
New sele	ction options	have been added to this i	ndicator. Pleas	se review your prefilled response	s carefully.
SG 12.	1 Indicat	e whether your organisation	Lusas invastmai	nt consultants	
			i uses investine	nt consultants.	
		tment consultants			
☑ No,	we do not use	investment consultants.			
ESG is	ssues in ass	set allocation			
00.40	Manufact		Duke	Description	DDI 4
SG 13	Mandatory		Public	Descriptive	PRI 1
			30		

SG 13.1

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

- $\square$  Yes, in order to assess future ESG factors
- ☑ Yes, in order to assess future climate-related risks and opportunities

Describe

In 2020 we will hire Ortec to analyze the impact of different climate scenarios on our balance sheet.

□ No, our organisation does not currently carry out scenario analysis and/or modelling

SG 13.2

Indicate if your organisation considers ESG issues in strategic asset allocation and/or allocation of assets between sectors or geographic markets.

We do the following

- ☑ Allocation between asset classes
- ☐ Determining fixed income duration
- ☐ Allocation of assets between geographic markets
- □ Sector weightings
- ☐ Other, specify
- $\square$  We do not consider ESG issues in strategic asset allocation

### Asset class implementation not reported in other modules

SG 16 Mandatory Public Descriptive General

SG 16.1

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

Asset Class	Describe what processes are in place and the outputs or outcomes achieved
Fixed income - Corporate (financial)	The internally managed fixed income assets are very limited in size (1,2% of total assets) and only consist of three positions. We do a general screening before investing and we obviously ensure that we do not invest in any names on our exclusion list.  Due to the limited exposure to these positions, we suggest not to include these positions in the assessment.
Fixed income - Corporate (non-	The internally managed fixed income assets are very limited in size (1,2% of total assets) and only consist of three positions. We do a general screening before investing and we obviously ensure that we do not invest in any names on our exclusion list.
financial)	Due to the limited exposure to these positions, we suggest not to include these positions in the assessment.



### Communication

SG 19 Mandatory Public Core Assessed PRI 2, 6

SG 19.1

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

Selection, Appointment and Monitoring

Do you disclose?

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

The information disclosed to clients/beneficiaries is the same

Yes

 $\bigcirc$  No



Details of the responsible investment activities carried out by managers on your behalf  E. S and/or G impacts and outcomes that have resulted from your managers' investments and/or active wnership  Other  Frequency  Quarterly or more frequently  Biannually  Annually  Less frequently than annually  Ad-hoc/when requested  URL  URL  tps://www.dela.nl/-/media/files/corporate/181203 mvb-beleid-2018.pdf  URL  tps://www.dela.nl/over-dela/over-cooperatie-dela/governance/ons-beleid/maatschappelijk-verantwoord-aleggen  Listed equity - Engagement  Do you disclose?  O We do not disclose to either clients/beneficiaries or the public.  We disclose to clients/beneficiaries only.  We disclose to the public  The information disclosed to clients/beneficiaries is the same	isclosure to public and URL	$\downarrow$
In the information disclosed to clients/beneficiaries is the same  In the information disclosed to clients/beneficiaries is the same  In the information disclosed to clients/beneficiaries is the same  In the same  In the same  In the same  In the responsible investment activities carried out by managers on your behalf  It is, and/or G impacts and outcomes that have resulted from your managers' investments and/or active where the same in the same investments and/or active where the property investments and/or ac	Disclosure to public and URL	
A E, S and/or G impacts and outcomes that have resulted from your managers' investments and/or active winership  Other  Frequency  Quarterly or more frequently  Biannually  Annually  Less frequently than annually  Ad-hoc/when requested  URL  https://www.dela.nl/-/media/files/corporate/181203_mvb-beleid-2018.pdf  URL  https://www.dela.nl/over-dela/over-cooperatie-dela/governance/ons-beleid/maatschappellijk-verantwoord-eleggen  Listed equity - Engagement  Do you disclose?  We do not disclose to either clients/beneficiaries or the public.  We disclose to clients/beneficiaries only.  We disclose to the public  The information disclosed to clients/beneficiaries is the same	☐ How responsible investment considerations are included in manager selection, appointment and nonitoring processes	
Other	☐ Details of the responsible investment activities carried out by managers on your behalf	
Frequency  Quarterly or more frequently  Biannually  Annually  Less frequently than annually  Ad-hoc/when requested  URL  https://www.dela.nl/-/media/files/corporate/181203_mvb-beleid-2018.pdf  URL  https://www.dela.nl/over-dela/over-cooperatie-dela/qovernance/ons-beleid/maatschappelijk-verantwoord-beleggen  Listed equity - Engagement  Do you disclose?  O We do not disclose to either clients/beneficiaries or the public.  We disclose to clients/beneficiaries only.  We disclose to the public  The information disclosed to clients/beneficiaries is the same	☑ E, S and/or G impacts and outcomes that have resulted from your managers' investments and/or active ownership	
□ Quarterly or more frequently □ Biannually □ Annually □ Less frequently than annually □ Ad-hoc/when requested □ URL □ https://www.dela.nl/-/media/files/corporate/181203 mvb-beleid-2018.pdf □ URL □ https://www.dela.nl/over-dela/over-cooperatie-dela/qovernance/ons-beleid/maatschappelijk-verantwoord-beleggen □ Listed equity - Engagement □ Do you disclose? □ We do not disclose to either clients/beneficiaries or the public. □ We disclose to the public □ The information disclosed to clients/beneficiaries is the same	□ Other	
□ Less frequently than annually □ Ad-hoc/when requested  URL  https://www.dela.nl/-/media/files/corporate/181203_mvb-beleid-2018.pdf  URL  https://www.dela.nl/over-dela/over-cooperatie-dela/governance/ons-beleid/maatschappelijk-verantwoord-beleggen  Listed equity - Engagement  Do you disclose? □ We do not disclose to either clients/beneficiaries or the public. □ We disclose to clients/beneficiaries only. □ We disclose to the public  The information disclosed to clients/beneficiaries is the same	Frequency	
□ Biannually □ Less frequently than annually □ Ad-hoc/when requested  URL  https://www.dela.ni/-/media/files/corporate/181203_mvb-beleid-2018.pdf  URL  https://www.dela.ni/over-dela/over-cooperatie-dela/governance/ons-beleid/maatschappelijk-verantwoord-beleggen  Listed equity - Engagement  Do you disclose?  ○ We do not disclose to either clients/beneficiaries or the public. ○ We disclose to clients/beneficiaries only. ② We disclose to the public  The information disclosed to clients/beneficiaries is the same	☐ Quarterly or more frequently	
✓ Annually  ☐ Less frequently than annually ☐ Ad-hoc/when requested  URL  https://www.dela.nl/-/media/files/corporate/181203_mvb-beleid-2018.pdf  URL  https://www.dela.nl/over-dela/over-cooperatie-dela/governance/ons-beleid/maatschappelijk-verantwoord-beleggen  Listed equity - Engagement  Do you disclose?  ○ We do not disclose to either clients/beneficiaries or the public. ○ We disclose to clients/beneficiaries only. ② We disclose to the public  The information disclosed to clients/beneficiaries is the same		
Less frequently than annually  Ad-hoc/when requested  URL  https://www.dela.nl/-/media/files/corporate/181203_mvb-beleid-2018.pdf  URL  https://www.dela.nl/over-dela/over-cooperatie-dela/governance/ons-beleid/maatschappelijk-verantwoord-beleggen  Listed equity - Engagement  Do you disclose?  We do not disclose to either clients/beneficiaries or the public.  We disclose to clients/beneficiaries only.  We disclose to the public  The information disclosed to clients/beneficiaries is the same		
URL https://www.dela.nl/-/media/files/corporate/181203_mvb-beleid-2018.pdf  URL https://www.dela.nl/over-dela/over-cooperatie-dela/governance/ons-beleid/maatschappellijk-verantwoord-beleggen  Listed equity - Engagement  Do you disclose?  We do not disclose to either clients/beneficiaries or the public.  We disclose to clients/beneficiaries only.  We disclose to the public  The information disclosed to clients/beneficiaries is the same	·	
Listed equity - Engagement  Do you disclose to either clients/beneficiaries or the public.  We disclose to the public  The information disclosed to clients/beneficiaries is the same		
Listed equity - Engagement  Do you disclose?  We do not disclose to clients/beneficiaries or the public.  We disclose to clients/beneficiaries only.  We disclose to the public  The information disclosed to clients/beneficiaries is the same	https://www.dela.nl/-/media/files/corporate/181203_mvb-beleid-2018.pdf	
Listed equity - Engagement  Do you disclose?  We do not disclose to either clients/beneficiaries or the public.  We disclose to clients/beneficiaries only.  We disclose to the public  The information disclosed to clients/beneficiaries is the same	URL	
Listed equity - Engagement  Do you disclose?  We do not disclose to either clients/beneficiaries or the public.  We disclose to clients/beneficiaries only.  We disclose to the public  The information disclosed to clients/beneficiaries is the same	https://www.dela.nl/over-dela/over-cooperatie-dela/governance/ons-beleid/maatschappelijk-verantwoord-	-
Do you disclose?  O We do not disclose to either clients/beneficiaries or the public.  We disclose to clients/beneficiaries only.  We disclose to the public  The information disclosed to clients/beneficiaries is the same		
Do you disclose?  O We do not disclose to either clients/beneficiaries or the public.  We disclose to clients/beneficiaries only.  We disclose to the public  The information disclosed to clients/beneficiaries is the same		
<ul> <li>We do not disclose to either clients/beneficiaries or the public.</li> <li>We disclose to clients/beneficiaries only.</li> <li>We disclose to the public</li> </ul> The information disclosed to clients/beneficiaries is the same	Listed equity - Engagement	
<ul> <li>We disclose to clients/beneficiaries only.</li> <li>We disclose to the public</li> </ul> The information disclosed to clients/beneficiaries is the same	Do you disclose?	
We disclose to the public  The information disclosed to clients/beneficiaries is the same	We do not disclose to either clients/beneficiaries or the public.	
The information disclosed to clients/beneficiaries is the same	○ We disclose to clients/beneficiaries only.	
	We disclose to the public	
	The information disclosed to clients/beneficiaries is the same	
(e) YAS	Yes	



 $\bigcirc$  No

Disclosure to public and URL		
Disclosure to public and URL		
$\Box$ Details on the selection of engagement cases and definition of objectives of the selections, priorities and specific goals		
☑ Breakdown of engagements by type/topic		
☑ Breakdown of engagements by region		
☑ An assessment of the current status of the progress achieved and outcomes against defined objectives		
☐ 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.)		
$\hfill\Box$ Details on whether the provided information has been externally assured		
☑ Outcomes that have been achieved from the engagement		
☐ Other information		
Frequency		
☑ Quarterly or more frequently		
□ Biannually		
□ Annually		
☐ Less frequently than annually		
☐ Ad-hoc/when requested		
URL		
https://www.dela.nl/-/media/files/corporate/dela-managementsamenvatting-3e-kwartaal-2019.pdf		
URL		
https://www.dela.nl/over-dela/over-cooperatie-dela/governance/ons-beleid/maatschappelijk-verantwoord-beleggen		
Listed equity - (Provy) Voting		

Listed equity – (Proxy) Voting

Do you disclose?

- $\ensuremath{\bigcirc}$  We do not disclose to either clients/beneficiaries or the public.
- $\ \bigcirc$  We disclose to clients/beneficiaries only.
- $\ensuremath{\, \bullet \,}$  We disclose to the public



The information disclosed to clients/beneficiaries is the same

Yes

 $\bigcirc$  No

Disclosure to public and URL
Disclosure to public and URL
Disclose all voting decisions
O Disclose some voting decisions
Only disclose abstentions and votes against management
Frequency
☑ Quarterly or more frequently
□ Biannually
☐ Annually
☐ Less frequently than annually
☐ Ad hoc/when requested
LID
URL
https://www.dela.nl/over-dela/over-cooperatie-dela/governance/ons-beleid/maatschappelijk-verantwoord-beleggen
URL
https://www.dela.nl/-/media/files/corporate/dela-gedetailleerde-stemrapportage-3e-kwartaal-2019.pdf

Property

Do you disclose?

- $\ensuremath{\bigcirc}$  We do not disclose to either clients/beneficiaries or the public.
- $\ensuremath{\bullet}$  We disclose to clients/beneficiaries only.
- $\bigcirc$  We disclose to the public



Disclosure to	o clients/beneficiaries					
	Disclosure to clients/beneficiaries					
☑ ESG inform	nation on how you select property investments					
☑ ESG information on how you monitor and manage property investments						
☑ Information on your property investments' ESG performance						
☐ Other						
	Frequency					
☐ Quarterly o	or more frequently					
☐ Biannually						
☑ Annually						
☐ Less frequently than annually						
☐ Ad-hoc/wh	en requested					



# Coöperatie DELA

**Reported Information** 

Public version

Indirect – Manager Selection, Appointment and Monitoring

## PRI disclaimer

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



Listed Equity and Fixed Income Strategies							
AM 01	Mano	datory			Public	Gateway	PRI 1
SAM	01.1	Indicate w to impleme	hich of the fo ent on your b	ollowing ESG ehalf for all y	incorporation stra your listed equity a	itegies you require your externa ind/or fixed income assets:	l manager(s
		Active in	ovestment str	ategies			
Active investrategies	estmen	t	Listed Equity	FI - SSA	FI - Corporate (financial)	FI - Corporate (non- financial)	
Screening			$\checkmark$	<b>V</b>		Ø	
Thematic					<b>V</b>	V	
Integration			<b>V</b>	<b>V</b>	<b>V</b>	<b></b>	
None of the	e above						
		Passive	investment s	strategies	'	'	
Passive in strategies	vestme	ent	Listed Equity	FI - SSA	FI -Corporate (financial)	FI -Corporate (non- financial)	
Screening			$\checkmark$	<b>V</b>	$\checkmark$		
Thematic							
Integration			<b></b>			Ø	
None of the above							
Selec	otion -						
					D.11		0.01
AM 02	Mano	datory			Public	Core Assessed	PRI 1



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

**SAM 02.1** 

	LE	FI - SSA	FI - Corporate (financial)	FI - Corporate (non-financial)	Property	Infrastructure
Your organisation's investment strategy and how ESG objectives relate to it	<b>V</b>	<b>V</b>			<b>V</b>	
ESG incorporation requirements	V	<b>V</b>	Ø	Ø	<b>V</b>	Ø
ESG reporting requirements	<b>V</b>	<b>V</b>	<b>V</b>	<b>V</b>	<b>V</b>	<b>V</b>
Other	<b>V</b>	<b>V</b>	<b>V</b>	<b>V</b>	<b>V</b>	<b>V</b>
No RI information covered in the selection documentation						

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

In its due diligence processes DELA 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	$\overline{\mathbf{V}}$	<b>V</b>			V	
Assess the quality of investment policy and its reference to ESG	$\overline{\mathbf{V}}$	<b>V</b>	<b>V</b>	$\square$	<b>V</b>	☑
Assess the investment approach and how ESG objectives are implemented in the investment process	$\overline{\mathbf{V}}$	<b>V</b>			V	V
Review the manager's firm-level vs. product-level approach to RI	$\overline{\mathbf{V}}$	<b>V</b>	$\square$	Ø	<b>V</b>	v
Assess the ESG definitions to be used	<b>V</b>	<b>V</b>	V	V	<b>V</b>	V
Other						
None of the above						

ESG people/oversight

	LE	FI - SSA	FI - Corporate (financial)	FI - Corporate (non-financial)		Property	Infrastructure
Assess ESG expertise of investment teams	V	V	V			<b>V</b>	☑
Review the oversight and responsibilities of ESG implementation	<b>\</b>	$\checkmark$		✓			✓
Review how is ESG implementation enforced /ensured	$\overline{\triangleright}$	<b>V</b>					✓
Review the manager's RI- promotion efforts and engagement with the industry		$\checkmark$	$ \mathbf{\nabla}$				✓
Other							
None of the above							

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	$\checkmark$	<b>V</b>	Ø	V		
Review and agree the use of ESG data in the investment decision making process	V	<b>V</b>	V	Ø	<b>V</b>	
Review and agree the impact of ESG analysis on investment decisions	$\overline{\vee}$	<b>V</b>			<b>V</b>	
Review and agree ESG objectives (e.g. risk reduction, return seeking, real-world impact)	$\overline{\mathbf{V}}$	<b>V</b>	V			V
Review and agree manager's ESG risk framework	$\checkmark$	<b>V</b>	V	Ø	<b>V</b>	V
Review and agree ESG risk limits at athe portfolio level (portfolio construction) and other ESG objectives	<b>\overline{\chi}</b>	<b>V</b>	V			☑
Review how ESG materiality is evaluated by the manager	V	V	$\square$	Ø		
Review process for defining and communicating on ESG incidents					<b>V</b>	
Review and agree ESG reporting frequency and detail	V	$\checkmark$	<b>V</b>	Ø	<b>V</b>	Ø
Other, specify						
None of the above						

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 as	ssurance process on ESG/RI data and processes							
☑ Review Pl	RI Transparency Reports							
☑ Request and discuss PRI Assessment Reports								
	with the potential shortlisted managers covering ESG/RI themes							
☑ Site visits	to potential managers offices							
☐ Other, spe	ecify							

**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						
ESG score	V	<b>V</b>	<b>V</b>	<b>V</b>	<b>V</b>	<b>V</b>
ESG weight	V	<b>V</b>	<b>V</b>	<b>V</b>		
Real world economy targets			Ø			
Other RI considerations	<b>V</b>	<b>V</b>	<b>V</b>	<b>V</b>	<b>V</b>	<b>V</b>
None of the above						

You selected an `Other` option in table SAM 02.4 above, please 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 shortlisted managers. ESG is an important item on this and hence it directly influcences the scores and hence the decision for a specific manager.

Appointment							
SAM 04	Mandatory	Public	Core Assessed	PRI 1			



**SAM 04.1** 

Indicate if in the majority of cases and where the structure of the product allows, your organisation does any of the following as part of the manager appointment and/or commitment process

	✓ Sets standard benchmarks or ESG benchmarks							
☑ Defines E	☑ Defines ESG objectives and/ or ESG related exclusions/restrictions							
✓ Sets incer	☑ Sets incentives and controls linked to the ESG objectives							
☑ Requires	☑ Requires reporting on ESG objectives							
☑ Requires	the investment manager to adhere to ESG guidelines, regulations, principles or standards							
☐ Other, spe	ecify (1)							
☐ Other, spe	ecify (2)							
☐ None of the	ne 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							
☑ Listed e	equity (LE)							
	Benchmark							
☑ St	andard benchmark							
□ E\$	SG benchmark, specify							
	ESG Objectives							
□ E\$	SG related strategy, specify							
	SG related investment restrictions, specify							
☑ ES	SG integration, specify							
le	taking ESG aspects into account in the analysis and price targets for stocks							
☑ Er	ngagement, specify							
	cooperation with our ESG provider, we determine priorities for engagement and voting on an annual sis.							
✓Vo	oting, specify							
	cooperation with our ESG provider, each year we determine the priorities of our engagment and ting policy.							
□ Pr	☐ Promoting responsible investment							
	SG specific improvements							
□ O1	ther, specify							
□ E\$	☐ ESG guidelines/regulation, principles/standards, specify							



	Incentives and controls
☐ Fee base	ed incentive
	nication and remedy of breaches
☐ Termina	tion
□ No fee/ b	preach of contract
	Reporting requirements
O Monthly	
<ul><li>Quarterly</li></ul>	У
O Bi-annua	ally
O Annually	
O Ad-hoc/v	when requested
xed income	- SSA (SSA)
	Benchmark
☐ Standard	d benchmark, specify
☑ ESG ber	nchmark, specify
Indicator	ESG Objectives
□ ESG rela	ated strategy, specify
	ated investment restrictions, specify
	egration, specify
	ve. Both credit and ESG considerations play a role in establishing the benchmark countries.
	nent, specify
□ Voting, s	
	ng responsible investment
	ecific improvements
☐ Other, sp	
☐ ESG gui	delines/regulation, principles/standards, specify
_	
	Incentives and controls
☐ Fee base	ed incentive
☑ Commur	nication and remedy of breaches
☐ Termina	tion
□ No fee/ k	preach of contract



		Reporting requirements
	O Ad-hoc/\	when requested
	O Annually	
	O Bi-annua	ally
	<ul><li>Quarterly</li></ul>	y
	O Monthly	
$\checkmark$	Fixed income	- Corporate (financial)
		Benchmark
		d benchmark, specify
	Standard	benchmark but with DELA exclusion list
	☐ ESG ber	nchmark, specify
		ESG Objectives
	☐ Other, s	pecify
	☑ ESG rela	ated strategy, specify
	Dedicate	ed bucket for green bonds in this mandate
	☐ ESG rela	ated investment restrictions, specify
	☑ ESG inter	egration, specify
	ESG as	part of the credit analysis
		ment, specify
	In coope	ration with our ESG provider, we determine priorities for engagement on an annual basis.
	☐ Voting, s	specify
	☐ Promotir	ng responsible investment
	☐ ESG spe	ecific improvements
	☐ Other, sp	pecify
	☐ ESG gui	delines/regulation, principles/standards, specify
		Incentives and controls
	☐ Fee base	ed incentive
		nication and remedy of breaches
	☐ Termina	tion
	☐ No fee/ k	preach of contract



		Reporting requirements
	O Ad-hoc/v	vhen requested
	<ul> <li>Annually</li> </ul>	
	O Bi-annua	ally
	<ul><li>Quarterly</li></ul>	<b>y</b>
	O Monthly	
$\checkmark$	Fixed income	- Corporate (non-financial)
		Benchmark
		d benchmark, specify
	With DEI	_A exclusion list
	☐ ESG ber	nchmark, specify
		ESG Objectives
	☐ Other, sp	pecify
	☑ ESG rela	ated strategy, specify
	Dedicate	d bucket for green bonds in this mandate
	☐ ESG rela	ated investment restrictions, specify
		egration, specify
	ESG fac	tors taken into account in credit analysis
		nent, specify
	In coope	ration with our ESG provider, we determine priorities for engagement on an annual basis.
	☐ Voting, s	pecify
	☐ Promotir	ng responsible investment
	☐ ESG spe	ecific improvements
	☐ Other, sp	pecify
	☐ ESG gui	delines/regulation, principles/standards, specify
		Incentives and controls
	☐ Fee base	ed incentive
	☑ Commure	nication and remedy of breaches
	☐ Termina	tion
	□ No fee/ b	preach of contract



		Reporting requirements
	O Ad-hoc/v	when requested
	<ul><li>Annually</li></ul>	
	○ Bi-annua	ally
	<ul><li>Quarterly</li></ul>	<b>y</b>
	O Monthly	
<b>√</b>	Property	
		Benchmark
		benchmark, specify
	standard	benchmark
	☑ ESG ber	nchmark, specify
	GRESB	
		ESG Objectives
	☐ ESG rela	ated strategy, specify
		ated investment restrictions, specify
	DELA ex condition	clusion list for 'black list' countries and organizations (freedom of speech and labour
	☑ ESG inte	egration, specify
	Make su	re ESG factors are taken into account in property and portfolio management
	□ Engager	nent, specify
	□ Voting, s	pecify
	□ Promotir	ng responsible investment
	☐ ESG spe	ecific improvements
	☐ Other, sp	pecify
	☐ ESG gui	delines/regulation, principles/standards, specify
		Incentives and controls
	☐ Fee base	ed incentive
		nication and remedy of breaches
	☐ Terminat	tion
	☐ No fee/ b	preach of contract



		Reporting requirements									
	O Monthly										
	<ul><li>Quarterly</li></ul>	y									
	O Bi-annua	ally									
	<ul><li>Annually</li></ul>										
	O Ad-hoc/v	vhen requested									
$\checkmark$	Infrastructure										
	Benchmark										
		d benchmark, specify									
		ark equal to portfolio for the time being									
	GRESB	nchmark, specify									
	GRESD										
		ESG Objectives									
	☑ ESG rela	ated strategy, specify									
		ole energy fund, EUR 100 mln. commitment									
	☐ ESG related investment restrictions, specify										
	☐ ESG integration, specify										
	☐ Engagement, specify										
	☐ Voting, s	specify									
	☐ Promotir	ng responsible investment									
	☐ ESG spe	ecific improvements									
	☐ Other, sp	pecify									
	☐ ESG gui	delines/regulation, principles/standards, specify									
		Incentives and controls									
	☐ Fee base	ed incentive									
	☑ Commur	nication and remedy of breaches									
	☐ Terminat	tion									
	□ No fee/ b	preach of contract									
		Reporting requirements									
	O Ad-hoc/v	vhen requested									
	<ul> <li>Annually</li> </ul>										
	○ Bi-annua	ally									
	<ul><li>Quarterly</li></ul>	У									
	O Monthly										



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							
	actions, terminate contract with the manager						
☐ Other, specify							
☐ No action:	s are taken if any of the ESG requirements are not met						

Monitoring											
SAM 05	Mandatory	Public	Core Assessed	PRI 1							

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

**SAM 05.1** 

				<u> </u>		
	LE	FI - SSA	FI - Corporate (financial)	FI - Corporate (non- financial)	Property	Infrastructure
ESG objectives linked to investment strategy (with examples)				Ø	<b>V</b>	
Evidence on how the ESG incorporation strategy(ies) affected the investment decisions and financial / ESG performance of the portfolio/fund	<b>V</b>	✓	✓	<b>I</b>		☑
Compliance with investment restrictions and any controversial investment decisions	<b>V</b>	V	Ø	V	<b>V</b>	☑
ESG portfolio characteristics	<b>V</b>	<b>V</b>	$\checkmark$		$\overline{\lor}$	
How ESG materiality has been evaluated by the manager in the monitored period	<b>V</b>		Ø	V	<b>V</b>	☑
Information on any ESG incidents	<b>√</b>	V	<b>V</b>	<b>V</b>	$\overline{\lor}$	<b>V</b>
Metrics on the real economy influence of the investments				<b>V</b>		
PRI Transparency Reports	<b>V</b>					
PRI Assessment Reports	<b>V</b>	V	<b>V</b>	$\checkmark$		
RI-promotion and engagement with the industry to enhance RI implementation		<b>V</b>		Ø	<b>V</b>	
Changes to the oversight and responsibilities of ESG implementation						
Other general RI considerations in investment management agreements; specify						
None of the above						

**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	<b>V</b>	$\checkmark$	<b>V</b>	$\checkmark$	<b>V</b>	<b>V</b>
ESG weight	<b>V</b>		<b>V</b>	$\checkmark$	<b>V</b>	<b>V</b>
ESG performance minimum threshold		<b>V</b>			<b>V</b>	V
Real world economy targets						
Other RI considerations						
None of the above						

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 life examples of how ESG factors influenced decision making for the portfolio manager during that quarter. We also typically discuss DELA's Restriction List and how it impacted performance versus the benchmark.

Outputs and outcomes							
SAM 09	Mandatory	Public	Additional Assessed	PRI 1,6			

**SAM 09.1** 

Provide examples of how ESG issues have been addressed in the manager selection, appointment and/or monitoring process for your organisation during the reporting year.

☑ Add Example 1



Topic or issue	Quarterly call discussions on ESG
Conducted by	☑ Internal staff
Asset class	✓ All asset classes  □ Listed Equity  □ Fixed income – SSA  □ Fixed income – corporate (financial)  □ Fixed income – corporate (non financial)  □ Property  □ Infrastructure
Scope and process	Discussions during all the Q2 review calls on ESG with all managers, with ESG specialists attending. Discussions on the ESG process, results, engagement, ratings, etc. Also discussed the possiblity of replacing some of the current benchmarks with ESG benchmarks.
Outcomes	ESG benchmarks for EMD HC and LC have been further researched and will probably be implemented in 2020.

☑ Add Example 2



Topic or issue	Carbon reduction
Conducted by	☑ Internal staff
Asset class	□ All asset classes □ Listed Equity □ Fixed income – SSA □ Fixed income – corporate (financial) □ Fixed income – corporate (non financial) □ Property □ Infrastructure
Scope and process	With the manager of our passive equity mandates we have researched and agreed upon a 50% reduction in carbon intensity w.r.t. the benchmark and a 10% increase in the average ESG-score.
Outcomes	This has been agreed upon by our board in january 2020 and wille be implemented in Q1 2020.
□ Add Exa	mple 3
☐ Add Exa	mple 4
□ Add Exa	mple 5
☐ Add Exa	mple 6
□ Add Exa	mple 7
☐ We are r	not able to provide examples



# Coöperatie DELA

**Reported Information** 

Public version

**Direct - Listed Equity Active Ownership** 

## PRI disclaimer

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



#### Overview

LEA 01 Mandatory Public Core Assessed PRI 2

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

LEA 01.1

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

Yes

**LEA 01.2** 

Attach or provide a URL to your active ownership policy.

- O Attachment provided:
- URL provided:

URL

 $\underline{https://www.bmogam.com/gb-en/intermediary/wp-content/uploads/2019/05/responsible-investment-approach.pdf}$ 

**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
- $\ensuremath{\square}$  Transparency of engagement activities
- $\ensuremath{\square}$  Due diligence and monitoring process
- ☑ Insider information
- ☐ Service Provider specific criteria
- ☐ Other; (specify)
- $\ensuremath{\boxdot}$  (Proxy) voting approach



	Voting										
☑ ES	GG issues										
☑ Pri	oritisation and scope of voting activities										
☑ Me											
☑ Tra	☑ Transparency of voting activities										
☑ Re	☑ Regional voting practice approaches										
☑ Fili	☑ Filing or co-filing resolutions										
☑ Co	mpany dialogue pre/post-vote										
☑ De	cision-making processes										
□ Se	curities lending processes										
□ Oth	her; (specify)										
☐ Other											
☐ None of	the above										
○ No											
<b>LEA 01.4</b> Do	you outsource any of your active ownership activities to service providers?										
Yes											
	Whore getive suppossing activities are conducted by coming providers, indicate whether your										
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	active ownership policy covers any of the following:										
✓ Outline of	active ownership policy covers any of the following: service provider's role in implementing your organisation's active ownership policy										
<ul><li>✓ Outline of</li><li>☐ Description</li><li>☐ Identification</li></ul>	active ownership policy covers any of the following: service provider's role in implementing your organisation's active ownership policy n of considerations included in service provider selection and agreements										
<ul><li>✓ Outline of</li><li>☐ Description</li><li>☐ Identification</li><li>☐ Outline of</li></ul>	active ownership policy covers any of the following: service provider's role in implementing your organisation's active ownership policy n of considerations included in service provider selection and agreements on of key ESG frameworks which service providers must follow										
<ul><li>☑ Outline of</li><li>☐ Description</li><li>☐ Identification</li><li>☐ Outline of</li></ul>	active ownership policy covers any of the following: service provider's role in implementing your organisation's active ownership policy n of considerations included in service provider selection and agreements on of key ESG frameworks which service providers must follow information sharing requirements of service providers n of service provider monitoring processes										
✓ Outline of ☐ Description ☐ Identification☐ Outline of ☐ Description	active ownership policy covers any of the following:  service provider's role in implementing your organisation's active ownership policy n of considerations included in service provider selection and agreements on of key ESG frameworks which service providers must follow information sharing requirements of service providers n of service provider monitoring processes ecify)										
<ul> <li>☑ Outline of</li> <li>☐ Description</li> <li>☐ Identification</li> <li>☐ Outline of</li> <li>☐ Description</li> <li>☐ Other; (special</li> </ul>	active ownership policy covers any of the following:  service provider's role in implementing your organisation's active ownership policy n of considerations included in service provider selection and agreements on of key ESG frameworks which service providers must follow information sharing requirements of service providers n of service provider monitoring processes ecify)										

**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.

	Engagement											
LEA 02 Ma			ndatory	Public	Core Assessed	PRI 1,2,3						
LEA 02.1			Indicate the method of engagement	, giving reasons fo	r the interaction.							



Type of engagement	Reason for interaction		
Individual / Internal staff engagements	$\hfill\square$ To influence corporate practice (or identify the need to influence it) on ESG issues		
	☐ To encourage improved/increased ESG disclosure		
	$\square$ To gain an understanding of ESG strategy and/or management		
	☑ We do not engage via internal staff		
Collaborative engagements	☐ To influence corporate practice (or identify the need to influence it) on ESG issues		
	$\square$ To encourage improved/increased ESG disclosure		
	$\square$ To gain an understanding of ESG strategy and/or management		
	☑ We do not engage via collaborative engagements		
Service provider engagements	☑ To influence corporate practice (or identify the need to influence it) on ESG issues		
	☑ To encourage improved/increased ESG disclosure		
	$\ensuremath{\square}$ To gain an understanding of ESG strategy and/or management		
	☐ 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

 $\bigcirc$  No

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

We discuss the topic of the engagement (or ESG issue(s)) of engagement

We discuss the rationale for the engagement

We discuss the objectives of the engagement

We select the companies to be engaged with

We discuss the frequency/intensity of interactions with companies

We discuss the next steps for engagement activity

We participate directly in certain engagements with our service provider

Other; specify

LEA 03 Mandatory Public Core Assessed PRI 2

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



**LEA 03.1** 

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

Yes

**LEA 03.2** 

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

Type of engagement	Criteria used to identify/prioritise engagements
Service-provider	
engagements	Service-provider engagements
	☑ Geography/market of the companies
	☑ Materiality of the ESG factors
	☑ Exposure (size of holdings)
	☑ Responses to ESG impacts that have already occurred
	☐ Responses to divestment pressure
	☑ Consultation with clients/beneficiaries
	☑ Consultation with other stakeholders (e.g. NGOs, trade unions, etc.)
	☑ Follow-up from a voting decision
	☑ Client request
	☑ Breaches of international norms
	☐ Other; (specify)
	☐ We do not outline engagement criteria for our service providers

 $\bigcirc \ \mathsf{No}$ 

LEA 04 Mandatory Public Core Assessed PRI 2

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

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

Service-provider engagements	<ul> <li>All engagement activities</li> <li>Majority of engagement activities</li> <li>Minority of engagement activities</li> <li>We do not define specific objectives for engagement activities carried out by our service providers</li> </ul>
------------------------------	--

LEA 05 Mandatory Public Core Assessed PRI 2

**LEA 05.1** 

Indicate whether you monitor and/or review engagement outcomes.



Service-pro						
Physhamen		<ul><li>Yes, in all cases</li></ul>				
engagements		O Yes, in a majority of ca	○ Yes, in a majority of cases			
		O Yes, in a minority of c	ases			
		<ul> <li>We do not monitor, or out by our service provid</li> </ul>		outcomes when the engagement	is carried	
		•				
LEA (	05.2 Indica		the following to moni	tor and/or review the progress of	engagement	
Service-pro	vider	✓ Define timelines/m	nilestones for your ob	jectives		
engagemen	nts		-	defined objectives and/or KPIs		
		☑ Track and/or moni	itor the progress of a	ction taken when original objectiv	es are not	
		met				
			essary, revise object	ives on a continuous basis		
		☐ Other; specify				
LEA 06	Mandatory		Public	Additional Assessed	PRI 2,4	
				n strategy when engagements are		
<b>⊚</b> Ye						
	I E A 06 2	Indicate the escalation stra	itegies used at your o	organisation following unsuccessf	ul	
		Indicate the escalation stra engagements.	tegies used at your o	organisation following unsuccessf	ul	
	LEA 06.2		itegies used at your o	organisation following unsuccessf	ul	
	LEA 06.2	engagements. g with other investors	itegies used at your o	organisation following unsuccessf	ul	
	✓ Collaborating  ☐ Issuing a pu	engagements. g with other investors		organisation following unsuccessf	ul	
	✓ Collaborating  ☐ Issuing a pu  ✓ Filing/submi	engagements.  g with other investors  blic statement	ion	organisation following unsuccessf	ul	
	✓ Collaborating  ☐ Issuing a pu  ✓ Filing/submit  ✓ Voting again	engagements.  g with other investors  ablic statement  atting a shareholder resolut	ion levant directors		ul	
	✓ Collaborating  ☐ Issuing a pu  ☑ Filing/submit  ☑ Voting again  ☑ Voting again	engagements.  g with other investors  ablic statement  atting a shareholder resolut  ast the re-election of the re	ion levant directors r the annual financial		ul	
	✓ Collaborating  ☐ Issuing a pu  ☑ Filing/subming  ☑ Voting againg  ☐ Submitting rules  ☐ Seeking legation	g with other investors ablic statement atting a shareholder resolutionst the re-election of the renst the board of directors of the mominations for election to all remedy / litigation	ion levant directors r the annual financial		ul	
	✓ Collaborating  ☐ Issuing a pu  ☑ Filing/submit  ☑ Voting againt  ☐ Submitting rt  ☐ Seeking legated  ☐ Reducing extending e	g with other investors ablic statement sitting a shareholder resolut nest the re-election of the result the board of directors of the mominations for election to	ion levant directors r the annual financial		ul	
	✓ Collaborating  ☐ Issuing a pu  ✓ Filing/submit  ✓ Voting againt  ✓ Voting againt  ☐ Submitting rung  ☐ Seeking legate  ☐ Reducing extended a pure of the control of the collaboration of the collab	g with other investors ablic statement sitting a shareholder resolutionst the re-election of the result the board of directors of the mominations for election to all remedy / litigation exposure (size of holdings)	ion levant directors r the annual financial		ul	
	✓ Collaborating  ☐ Issuing a pu  ☑ Filing/submit  ☑ Voting againt  ☐ Submitting rt  ☐ Seeking legated  ☐ Reducing extending e	g with other investors ablic statement sitting a shareholder resolutionst the re-election of the result the board of directors of the mominations for election to all remedy / litigation exposure (size of holdings)	ion levant directors r the annual financial		ul	
	✓ Collaborating  ☐ Issuing a pu  ☑ Filing/subming  ☑ Voting againg  ☐ Submitting rung  ☐ Seeking legated  ☐ Reducing extended  ☐ Divestmenture  ☐ Other; speci	g with other investors ablic statement sitting a shareholder resolutionst the re-election of the result the board of directors of the mominations for election to all remedy / litigation exposure (size of holdings)	ion levant directors r the annual financial		ul	
	✓ Collaborating  ☐ Issuing a pu  ☑ Filing/subming  ☑ Voting againg  ☐ Submitting rung  ☐ Seeking legated  ☐ Reducing extended  ☐ Divestmenture  ☐ Other; speci	g with other investors ablic statement sitting a shareholder resolutionst the re-election of the result the board of directors of the mominations for election to all remedy / litigation exposure (size of holdings)	ion levant directors r the annual financial		ul PRI 1,2	

Indicate whether insights gained from your organisation`s engagements are shared with investment decision-makers.



**LEA 07.1** 

Type of engagement	Insights shared
Service-provider engagements	<ul><li>Yes, systematically</li><li>Yes, occasionally</li></ul>
	○ No

LEA 07.2

Indicate the practices used to ensure that information and insights gained through engagements are shared with investment decision-makers.

☑ Involving investment decision-makers when developing an engagement programme
☑ Holding investment team meetings and/or presentations
☐ Using IT platforms/systems that enable data sharing
$\hfill\square$ Internal process that requires portfolio managers to re-balance holdings based on interaction and outcome levels
☐ Other; specify
□ None

**LEA 07.3** 

Indicate whether insights gained from your organisation's engagements are shared with your clients/beneficiaries.

Type of engagement	Insights shared
Service-provider engagements	<ul><li>Yes, systematically</li><li>Yes, occasionally</li></ul>
	○ 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 Public Gateway PRI 2

**LEA 08.1** 

Indicate whether you track the number of your engagement activities.

Type of engagement	Tracking engagements	
Service-provider engagements	$\odot$ Yes, we partially track the number of our service-provider engagements	
	○ 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).

### (Proxy) voting and shareholder resolutions **LEA 12 Public Descriptive** PRI 2 **Mandatory LEA 12.1** Indicate how you typically make your (proxy) voting decisions. Approach O We use our own research or voting team and make voting decisions without the use of service providers. O We hire service providers who make voting recommendations and/or provide research that we use to guide our voting decisions. O We hire service providers who make voting decisions on our behalf, except in some pre-defined scenarios where we review and make voting decisions. • We hire service providers who make voting decisions on our behalf. Based on • The service-provider voting policy we sign off on Our own voting policy

**LEA 12.2** 

Our clients' requests or policies

Other (explain)

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

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	15	Man	datory	Public	Descriptive	PRI 2
	LEA 15.1 Indicate the proportion of volume service providers acting on		service providers acting on your be			
	O 100	)%				
	○ 99-75%					
	<b>•</b> 74-50%					
	O 49-25%					
	O 24-	1%				
	○ Nei	ther we	e nor our service provider(s) raise cor	cerns with compan	nies ahead of voting	



LEA	15.2	Indicate the reasons for raising you	r concerns with the	se companies ahead of voting.		
☑ Vo	☑ Vote(s) concerned selected markets					
☑ Vote(s) concerned selected sectors						
☑ Vote(s) concerned certain ESG issues						
☑ Vote(s) concerned companies exposed to controversy on specific ESG issues						
☑ Vote(s) concerned significant shareholdings						
☑ CI	ent req	uest				
□ Ot	-					
16	Mar	datory	Public	Core Assessed	PRI 2	
LEA	16.1	Indicate the proportion of votes who communicated the rationale to comrecommendations. Indicate this as	panies for abstainir	ng or voting against management		
O 10	0%					
99	-75%					
O 74	-50%					
O 49	-25%					
O 24	-1%					
$\circ$ W	e do no	t communicate the rationale to compa	anies			
	ot applic nmenda	able because we and/or our service pations	oroviders did not ab	stain or vote against managemer	t	
LEA	16.2	Indicate the reasons why your orga abstaining or voting against manag			nale for	
☑ Vote(s) concern selected markets						
✓ Vo	ote(s) co	oncern selected sectors				
☑ Vo	te(s) co	oncern certain ESG issues				
✓ Vo	te(s) co	oncern companies exposed to control	ersy on specific ES	G issues		
☑ Vo	te(s) co	oncern significant shareholdings				
☑ CI	ent req	uest				
□ Ot	her					
LEA	16.3	In cases where your organisation of management recommendations, in			ng against	
⊚ Ye	es.					
$\circ$ No	)					
7	Mar	datary	Public	Core Assessed	PRI 2	
17	iviai	adatory	- ublic	Core Assessed	TRIZ	

**LEA 17.1** 

For listed equities in which you or your service provider have the mandate to issue (proxy) voting instructions, indicate the percentage of votes cast during the reporting year.

• We do track or collect this information

		Votes cast (to the nearest 1%)					
		%					
	98						
		Specify the basis on which this percentage is calculated					
	Of th	ne total number of ballot items on which you could have issued instructions					
	<ul><li>Of th</li></ul>	ne total number of company meetings at which you could have voted					
	Of th	e total value of your listed equity holdings on which you could have voted					
C	We do no	t track or collect this information					
E	A 17.2	Explain your reason(s) for not voting on certain holdings					
$\sqrt{}$	Shares were blocked						
$\sqrt{}$	Notice, ballots or materials not received on time						
	Missed deadline						
	Geograph	nical restrictions (non-home market)					

LEA 18	Voluntary	Public	Additional Assessed	PRI 2

☑ Administrative impediments (e.g., power of attorney requirements, ineligibility due to participation in share

**LEA 18.1** 

□ Cost

placement)

☐ Client request

☐ Other (explain)

☐ Conflicts of interest

☐ Holdings deemed too small

Indicate whether you track the voting instructions that you 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 have issued, indicate the proportion of ballot items that were:



Voting instructions	Breakdown as percentage of votes cast
For (supporting) management recommendations	72
Against (opposing) management recommendations	25
Abstentions	3

100%

 $\ensuremath{\bigcirc}$  No, we do not track this information

LEA 18.3

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

30

A 19	Man	datory	Public	Core Assessed	PRI 2
LEA 19	9.1	Indicate whether your organisation I	has a formal es	calation strategy following unsu	ccessful voting.
<ul><li>● Yes</li><li>○ No</li></ul>					
LEA 19	9.2	Indicate the escalation strategies us against management.	sed at your orga	anisation following abstentions a	and/or votes
☑ Contacting the company's board					
☑ Contacting the company's senior management					
$\hfill\Box$ Issuing a public statement explaining the rationale			ale		
☑ Initiating individual/collaborative engagement					
$\square$ Directing service providers to engage					
$\square$ Reducing exposure (holdings) / divestmen					



☐ Other

# Coöperatie DELA

**Reported Information** 

Public version

**Direct - Property** 

## PRI disclaimer

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#### **Overview**

PR 01 Mandatory Public Core Assessed PRI 1-6

PR 01.1

Indicate if your organisation has a Responsible Property Investment (RPI) policy.

Yes

PR 01.2

Provide a URL or attach the document

**☑** URL

https://www.delavastgoed.nl/mvo/voor-elkaar-en-met-elkaar/

☐ Attach Document

O 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]

We are actively reducing our exposure to direct real estate but the policy has remained the same throughout 2019 vs. 2018:

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:

All targets have the base year 2017 and end year 2020 - or stated otherwise:

- 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



# Pre-investment (selection) PR 04 Mandatory Public Gateway/Core Assessed PRI 1 PR 04.1 Indicate if your organisation typically incorporates ESG issues when selecting property investments. O Yes O No PR 04.4 Additional information. [Optional]

We are not selecting new properties because we are selling our direct investments.

Selec	tion, app	ointment and mon	itoring third-party pro	perty managers	
PR 07	Mandate	ory	Public	Core Assessed	PRI 4
PR 07.	1	dicate if your organisa third-party property m		n your selection, appointment	and/or monitoring
<ul><li>Yes</li></ul>	i				
Р	R 07.2	_	organisation includes ESG party property managers.	issues in your selection, appoi	ntment and/or

 $\ensuremath{\boxdot}$  Selection process of property managers incorporated ESG issues

Types of actions
$\ensuremath{\square}$ Request explanation of how ESG is effectively integrated, including inquiries about governance and processes
$\ensuremath{\square}$ 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
$\ensuremath{ullet}$ Request explanation of engaging stakeholders on ESG issues
☐ Other, explain



		Coverage						
	⊚ >75% to	100%						
	○ >50% to	75%						
	○ <50%							
$\checkmark$	Contractual r	equirements 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						
		SG reporting requirements						
	☑ Clear E	SG performance targets						
	☐ Other, e	explain						
		Coverage						
	● >75% to	100%						
	○ >50% to	75%						
	○ <50%							
$\checkmark$	Monitoring of	property managers covers ESG responsibilities and implementation						
		Types of actions						
	✓ Perform timeframe.	ance against quantitative and material environmental / resource targets over specified						
	☑ Perform benchmark	ance against quantitative and material environmental / resource targets against relevant						
	☐ Perform portfolio/in	ance against quantitative and qualitative targets to address social impacts of the vestment,						
	□ Other, e	xplain						
		Coverage						
	○ >75% to	100%						
	● >50% to	75%						
	O <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.



#### Post-investment (monitoring and active ownership)

#### **Overview**

PR 08 Mandatory Public 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.

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.

- ☑ We consider ESG issues in property monitoring and management
- ☑ We consider ESG issues in property developments and major renovations.
- ☑ We consider ESG issues in property occupier engagements
- ☑ We consider ESG issues in community engagements related to our properties
- ☐ 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.

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.

Next to that, we also involve the local community with redevelopment works to our assets.

 $\bigcirc$  No

#### **Property monitoring and management**

PR 09 Mandatory Public 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.

- >90% of property assets
- 51-90% of property assets
- 10-50% of property assets
- <10% of property assets</p>

(in terms of number of property assets)

PR 09.2

Indicate which ESG targets your organisation and/or property managers typically set and monitor

☑ Environmental



Target/KPI	Progress Achieved
15% electricity reduction like-for-like (2016-2020)	- 6.24% (2016-2017)
25% CO2 emission reduction managment organisation (2014-2020)	- 29,5% (2014-2018)

□ Governance

 $\square$  We do not set and/or monitor against targets

PR 09.3

Additional information. [Optional]

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

#### Property developments and major renovations

PR 11 Mandatory Public Core Assessed PRI 2

PR 11.1

Indicate the proportion of active property developments and major renovations where ESG issues have been considered.

- >90% of active developments and major renovations
- 51-90% of active developments and major renovations
- 10-50% of active developments and major renovations
- <10% of active developments and major renovations
- O N/A, no developments and major renovations of property assets are active

(by number of active property developments and refurbishments)

PR 11.2

Indicate if the following ESG considerations are typically implemented and monitored in your property developments and major renovations.

- ☑ Environmental site selection requirements
- ☑ Environmental site development requirements
- ☑ Sustainable construction materials
- ☑ Water efficiency requirements
- ☑ Energy efficiency requirements
- $\square$  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



	Occupier en	gagement						
PR 12	Mand	atory	Public	Core Assessed	PRI 2			
	PR 12.1	Indicate the proportion of proper engaged with on ESG issues du			operty managers,			
	○ >90% of	occupiers						
		of occupiers						
	O 10-50% (	of occupiers						
	○ <10% of	occupiers						
	(in terms of number of occupiers)							
	PR 12.2	Indicate if the following practises managers', occupier engageme		pically part of your, and/or yo	our property			
	☑ Distribute	e a sustainability guide to occupiers	3					
	☐ Organise	occupier events focused on increa	asing sustainability	awareness				
	☐ Deliver training on energy and water efficiency							
	☐ Deliver training on waste minimisation							
	☑ Provide f	eedback on energy and water cons	sumption and/or wa	aste generation				
	✓ Provide f	eedback on waste generation						
	☑ Carry out occupier satisfaction surveys							

 $\square$  Health and wellbeing of residents

☑ Offer green leases☐ Other, specify

# Coöperatie DELA

**Reported Information** 

Public version

Confidence building measures

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	Confidence building measures							
CM1	01	Mandatory		Public	Additional Assessed	General		
	CM1 0	Indicate whether the report year has undergone:	ted inforr	nation you have pro	ovided for your PRI Transparency	Report this		
	☐ Thir		from this year's PF	RI Transparency Report				
	<ul> <li>□ Third party assurance over selected responses from this year's PRI Transparency Report</li> <li>□ Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year</li> </ul>							
		d party assurance or audit of the c	orrect im	plementation of RI	processes (that have been report	ed to the		
		rnal audit of the correct implement ed to the PRI this year)	ation of R	RI processes and/or	accuracy of RI data (that have b	een		
	✓ Inte	rnal verification of responses befor	re submis	sion to the PRI (e.	g. by the CEO or the board)			
	•	Whole PRI Transparency Report	has beer	internally verified				
		Selected data has been internally	/ verified					
		er, specify						
		service provider BMO GAM has re e of the above	eviewed t	he entire response				
		le of the above						
CM1	02	Mandatory		Public	Descriptive	General		
	CM1 0	2.1 We undertook third party a	assurance	e on last year's PRI	Transparency Report			
	O Wh	ole PRI Transparency Report was	assured l	ast year				
	○ Sele	ected data was assured in last yea	r's PRI Ti	ransparency Repor	t			
		did not assure last year`s PRI Trai						
	O Nor	e of the above, we were in our pre	paration	year and did not re	port last year.			
CM1	03	Mandatory		Public	Descriptive	General		
	CM1 0	We undertake confidence Transparency Report:	building r	measures that are (	unspecific to the data contained in	n our PRI		
	☐ We adhere to an RI certification or labelling scheme							
	☐ We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report							
	□ ESG audit of holdings							
		er, specify						
		e of the above						
CM1	04	Mandatory		Public	Descriptive	General		



	CM1 04	.1	Do you plan to conduct third party a	assurance of this ye	ear`s PRI Transparency report?		
	Whole PRI Transparency Report will be assured						
	○ Selected data will be assured						
	• We d	do not p	lan to assure this year's PRI Trans	parency report			
0114	A-						
CM1	07	Manda	atory	Public	Descriptive	General	
	CM1 07		Indicate who has reviewed/verified Report . and if this applies to select			ransparency	
			ducted the verification or Chief-Level staff				
			Sign-off or review of responses				
	$\checkmark$	Sign-of	f				
		Review	of responses				
	☐ The	Board					
	☑ Inve	stment (	Committee				
			Sign-off or review of responses				
		Sign-of	f				
	$\checkmark$	Review	of responses				
	☐ Com	pliance	Function				

□ RI/ESG Team□ Investment Teams□ Legal Department□ Other (specify)