



# PRIVATE RI REPORT

## 2020

## Eastspring Investments

## About this report

This report is an export of the individual Signatory organisation responses to the PRI Reporting Framework during the reporting period specified above. It shows your responses to all completed indicators, even those you chose to keep private. It is designed for your internal review or – if you wish - to share with your stakeholders. The PRI will **not publish** this report on its website. Instead, you will be able to access the public RI Transparency report of your organisation and that of other signatories on the PRI website.

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.

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

OO 02.1	Select the location of your organisation's headquarters.	
	Singapore	
OO 02.2	Indicate the number of countries in which you have offices (including your headquarters).	
	<input type="radio"/> 1 <input type="radio"/> 2-5 <input type="radio"/> 6-10 <input checked="" type="radio"/> >10	
OO 02.3	Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).	
	3000	

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

OO 04.1	Indicate the year end date for your reporting year.	
	31/12/2019	
OO 04.2	Indicate your total AUM at the end of your reporting year.	
	Total AUM 241,000,000,000 USD 241000000000 USD	
OO 04.4	Indicate the assets which are subject to an execution and/or advisory approach. Provide this figure based on the end of your reporting year	
	<input checked="" type="checkbox"/> Not applicable as we do not have any assets under execution and/or advisory approach	

OO 05.1	Provide an approximate percentage breakdown of your AUM at the end of your reporting year using the following asset classes and investment strategies:	
	Internally managed (%)	Externally managed (%)
Listed equity	41.2	0

Fixed income	47.1	0
Private equity	0.7	0
Property	0	0
Infrastructure	0	0
Commodities	0	0
Hedge funds	0	0
Fund of hedge funds	0	0
Forestry	0	0
Farmland	0	0
Inclusive finance	0	0
Cash	0	0
Money market instruments	6	0
Other (1), specify	2	0
Other (2), specify	3	0

Internally managed 'Other (1)' description

Quantitative Strategies

Internally managed 'Other (2)' description

Multi Asset

OO 06 Mandatory Descriptive General

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

- as percentage breakdown
- as broad ranges

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

- Yes
- No

OO 06.5 Indicate whether your organisation uses fiduciary managers.

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

OO 06.6 Provide contextual information on your AUM asset class split. [Optional]

The AUM for Private Equity represents the total AUM of alternative assets, which include private equity, infrastructure, and fund of funds. The breakdown of alternative assets is not available.

OO 07 Mandatory to Report, Voluntary to Disclose Gateway General

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

Internally managed	60	SSA
	15	Corporate (financial)
	25	Corporate (non-financial)
	0	Securitised

OO 09 Mandatory Peering General

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

67.25

29.07	Developed Markets
1.97	Emerging Markets
1.71	Frontier Markets
	Other Markets

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

Listed equity – engagement

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

Listed equity – voting

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

Fixed income SSA – engagement

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

Please explain why you do not engage directly and do not require external managers to engage with companies on ESG factors.

Engagement with sovereigns is quite different from engagement with corporates due to political sensitivities and limited ability to influence.

Fixed income Corporate (financial) – engagement

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

Fixed income Corporate (non-financial) – engagement

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

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

Listed equity

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

Fixed income - SSA

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

Fixed income - corporate (financial)

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

Fixed income - corporate (non-financial)

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

Private equity

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

Money market instruments

- We address ESG incorporation.

We do not do ESG incorporation.

Other (1)

We address ESG incorporation.

We do not do ESG incorporation.

Other (2)

We address ESG incorporation.

We do not do ESG incorporation.

Other (1) [as defined in OO 05]

Quantitative Strategies

Other (2) [as defined in OO 05]

Multi Asset

OO 12

Mandatory

Gateway

General

OO 12.1

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

Core modules

Organisational Overview

Strategy and Governance

RI implementation directly or via service providers

Direct - Listed Equity incorporation

Listed Equity incorporation

Direct - Listed Equity active ownership

Engagements

(Proxy) voting

Direct - Fixed Income

Fixed income - SSA

Fixed income - Corporate (financial)

Fixed income - Corporate (non-financial)

Direct - Other asset classes with dedicated modules

Private Equity

Closing module

Closing module

OO LE 01

Mandatory to Report, Voluntary to Disclose

Gateway

General

OO LE 01.1

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

0

Passive

7

Active - quantitative (quant)

93

Active - fundamental and active - other

OO FI 01

Mandatory to Report, Voluntary to Disclose

Gateway

General

OO FI 01.1

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

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

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

Eastspring Investments does not have a breakdown for active and passive assets – the classification is usually tagged at the product level rather than the underlying asset level. For example, we may hold the same government bond in both active and passive bond portfolios, but we do not split the AUM by how much of the security is held in the active fund, and how much in the passive.

**OO FI 03** Mandatory Descriptive General

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

SSA	<input type="checkbox"/> 60	Developed markets
	<input type="checkbox"/> 40	Emerging markets

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

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

**OO PE 01** Mandatory Descriptive General

**OO PE 01.1** Provide a breakdown of your organisation's internally managed private equity investments by investment strategy.

Investment strategy	Percentage of your internally managed private equity holdings (in terms of AUM)
Venture capital	<input type="checkbox"/> >50% <input type="checkbox"/> 10-50% <input type="checkbox"/> <10% <input checked="" type="checkbox"/> 0%
Growth capital	<input type="checkbox"/> >50% <input type="checkbox"/> 10-50% <input type="checkbox"/> <10% <input checked="" type="checkbox"/> 0%

(Leveraged) buy-out	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%
Distressed/Turnaround/Special Situations	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%
Secondaries	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%
Other investment strategy, specify (1)	<input checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%
Other investment strategy, specify (2)	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%
Total 100%	

Other investment strategy, specify (1)

Fund of Funds.

OO PE 02	Mandatory to Report, Voluntary to Disclose	Descriptive	General
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OO PE 02.1 Indicate the level of ownership you typically hold in your private equity investments.

- a majority stake (>50%)
- 50% stake
- a significant minority stake (between 10-50%)
- a minority stake (<10%)
- a mix of ownership stakes

OO PE 02.2 Additional information. [Optional]

We are minorities in our fund of funds approach, however we may also co-invest.

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



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

✓ Yes

**SG 01.2** Indicate the components/types and coverage of your policy.

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

**SG 01.3** Indicate if the investment policy covers any of the following

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

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

We believe that we will make the best possible investment decisions on behalf of our clients by incorporating material environmental, social and governance (ESG) factors into our investment processes. This belief is core to our business. At the same time, we believe that there is no universal approach to Responsible Investment. At Eastspring, our investment teams are empowered to integrate ESG considerations into their investment processes and philosophies, as appropriate.

We recognise that sustainable investing requires a patient approach and an understanding that changes in corporate behaviour can support shareholder value over time. We firmly believe that companies that adopt sustainable business practices are more likely to deliver superior shareholder value in the long-term and, where appropriate, we encourage ongoing improvement through an ongoing and collaborative dialogue.

As a signatory to the UN-supported Principles for Responsible Investment, we are demonstrating not just our commitment to Responsible Investment, but our desire to become leaders in the field in Asia.

We are firmly committed to be a responsible steward of our clients’ assets. As a member of the International Corporate Governance Network, we adhere to their Global Stewardship Principles and Global Governance Principles.

**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]

We believe our Responsible Investment Standards in relation to ESG, Stewardship, Proxy Voting, and Best Execution are consistent with our fiduciary duty to our clients.

**Engagement**

Engagement is core to our Stewardship responsibilities. We aim to encourage business and management practices that support sustainable financial performance through constructive engagement based on our in-depth knowledge of the companies and their business environment. Where appropriate, we will play an active role in seeking to effect changes to maximise shareholder value.

We are also active members of collaborative organisations – from time to time, we may participate in collaborative engagement initiatives where we believe it to be in our client’s best interests to do so.

**Engagement Records**

We maintain summary records of company engagement relating material issues, which may be available to clients upon request.

We encourage direct client dialogues, using case studies which demonstrate our process in action and ultimately, how we execute our fiduciary duty.

**ESG Integration**

Each of our investment teams has its own approach to integrating ESG matters, which is dependent on the characteristics of each asset class and each investment strategy. Accordingly, investment teams have developed ESG policies that formalise their specific approach to ESG issues, and are explicitly integrated into investment processes. All investment professionals are responsible for incorporating all factors deemed to impact the investment decision-making process. As part of this, investment teams are responsible for the integration of ESG issues into the investment process,

rather than outsourcing this responsibility to dedicated ESG or stewardship specialists.

**Proxy Voting**

An active and informed voting policy is an integral part of our investment philosophy and forms a core part of our approach to engagement. Eastspring Investments follow a principles-based approach. All votes are considered in the context of the principles as set out in our investment teams' Proxy Voting Policies.

**Stewardship Principles**

As a member of International Corporate Governance Network (ICGN) our stewardship approach is aligned with the ICGN Global Stewardship Principles and ICGN Global Governance Principles.

Stewardship helps to promote high standards of corporate governance which contributes to sustainable value creation. Stewardship contributes to preserving and enhancing long-term value as part of a responsible investment approach. This includes the consideration of wider ethical, environmental and social factors as core components of fiduciary duty. Stewardship can enhance overall financial market stability and economic growth.

**Stewardship Codes**

Eastspring Investments is supportive in the application of Stewardship Codes in markets where we operate. Where applicable, we have developed policies to inform how we fulfill our stewardship responsibilities in respect of a particular Stewardship Code.

**Collaboration**

We believe that collaboration among investors is an effective way to address ESG issues and maximise investor influence. It helps to ensure consistency in the messages that companies, regulators and others receive from investors. We, therefore, take part in relevant collaborative initiatives and lead such activities where appropriate.

**Climate Change**

Climate change is a sustainability challenge facing us all. For investors, climate change and the need for a rapid transition to a low-carbon economy present significant financial risks and well as investment opportunities. Accordingly, we seek to consider material risks in our decision making processes – including current and potential regulatory changes, physical impacts and technology developments relating to climate change.

Our parent company, Prudential Plc, has chosen to adopt the TCFD recommendations and we are in the process of developing our Group-wide strategy in relation climate change.

**Transparency and Reporting**

We strive for transparency to clients and other interested stakeholders in our implementation of this policy. We have recently enhanced transparency by launching a comprehensive Responsible Investment (RI) web site, which documents our longer-term RI journey and RI Activities for 2019. We disclose our Responsible Investment Framework and Governance Structure, which includes our Group-wide Principles, Standards, and Policies. Additionally, we describe our approach to ESG integration for various asset classes and include video interviews with investors. The PRI Transparency report and other information, including our proxy voting results are also available on the RI Web site. In addition to our annual reporting to the PRI, we will publish an annual responsible investment report and other updates.

**Responsible Investment Framework and Governance Structure**

We are committed to an ongoing and long-term process of improving our approach to integrating ESG into our investment processes. We expect that ESG Policies will evolve over time to reflect changes in business practices, structures, technology, and the law. We have a Responsible Investment Framework and Governance Structure that oversees and implements our Responsible investment Standards, which inform our Responsible Investment (RI) policies. The Eastspring Management Committee (EMC) designates the Eastspring Investments Responsible Investment Taskforce (RIT) to oversee our RI activities. The RIT formally replaces the function of the Eastspring Responsible Investment Advisory Committee (ERiac), which has been dissolved effective 28 February 2020.

RIT provides a forum to determine strategic direction for Responsible Investment and the application of Eastspring Investments Responsible Investment Framework.

RIT is the sponsor for resource allocation to strategic Responsible Investment priorities and projects.

RIT assists the CEO and EMC in providing oversight of the activities relating to Responsible Investment across Eastspring Investments Local Business Units (LBU's).

RIT promotes the embedding of an appropriate Responsible Investment culture across the LBU's that is consistent with Eastspring Investments fiduciary duty.

The Eastspring Responsible Investment Working Group (ERIWG) is a sub-committee of the RIT.

The ERIWG assumes responsibility for the implementation of Eastspring Investments Responsible Investment Framework.

The ERIWG acts as a forum to discuss the practical and operational issues encountered in the application of Eastspring Investments Responsible Investment Framework and its associated Standards / procedures, and escalate topics as appropriate to the RIT.

No

**SG 01.6 Additional information [Optional].**

The firm-wide Eastspring Responsible Investment Standards and individual investment team-specific Responsible Investment/ESG Policies are available on our Responsible Investment web site: <https://www.eastspring.com/about-us/responsible-investment>.

**SG 01 CC Mandatory to Report, Voluntary to Disclose Descriptive General**

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

Yes

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

The transition to a low-carbon economy presents significant financial risks as well as opportunities. Our fundamental due diligence considers material risks to longer drivers of sustainable earnings and we look to understand what might change.

We believe transition and physical risks from climate change may have a meaningful impact to the sustainability of businesses that do not take strategic measures to address them. Financial impacts of climate-related issues are likely to specific for each company.

We engage with company management to determine their preparedness and strategic response to potential impacts from climate change risks,

where we see them as material to the trend drivers of sustainable returns. This is incorporated into our qualitative assessment which contributes to the conviction in our trend valuation assumptions. We also test for sensitivity in the trend valuation to potential changes in our assumptions to understand what the market is currently pricing.

Having identified potential risks to sustainable earnings, we may consider an investment where there is sufficient conviction in our fundamental assumptions and where we are more than compensated by valuation support.

A patient timeframe can improve the probability of outcomes. We believe our focused, valuation-driven approach is clearly aligned with stewardship activities, including ongoing company engagement, for shareholder value realisation over the longer term.

**Integration of transition and physical risks into trend valuation assumptions**

The following are examples of financial impacts from transition and physical risks that may be incorporated into our trend valuation assumptions where material and are subject to ongoing monitoring and engagement. This is not intended to be an exhaustive list.

In a changing competitive environment, impacted by climate-related transition risks, including changing demand, regulatory change and technology change or physical risks, such as disruption of operations, demand or supply for a company's products or services may be materially affected. This has implications for the likely level of longer-term trend returns a company can generate. Our trend valuation assumptions therefore consider changes in sources of revenue over the medium to long term.

We consider a company's willingness or ability to adapt to remain competitive in terms of the implications for our trend cost structure assumptions. For example, technology change may impact the level of research and development costs or infrastructure spending incurred by a company on a trend basis.

Additionally, there may be implications for a company's long-term plans in relation to managing its assets and liabilities. Impacts from transition risks or physical risks may influence long term strategic decisions around capital investment, restructuring, or impairment of assets.

A company's ability to access capital, either through ongoing cashflows or via access to debt may also be impacted by transition or physical risks. For example, an investment in infrastructure or research and development, may impact its capital structure. Potential changes to cost of capital, due to perceived business risks, may impact a company's ability raise or refinance debt. This in turn, may have implications for dilution of shareholders, should equity be raised in order meet capital requirements.

No

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

Yes

**Describe the associated timescales linked to these risks and opportunities.**

Our approach is to holistically consider material risks, including the likelihood and impact from climate risks and opportunities, at a company-level over the medium term, within a trend valuation concept. Our approach is to anchor our decisions around what the market is already "pricing" for an asset and we ensure that we are being amply compensated for observed risks with significant valuation upside.

Our financial model requires future returns from the business to be faded to an equilibrium level, which are applied into perpetuity for the valuation. The analysis uses at least 10 years of historical data and five years of forward estimates, which is faded to an equilibrium level. This trend concept of valuation is not reliant on time and is not dependant on the accuracy of forecasting future returns. However, it facilitates an understanding of the price of a company with respect to a sustainable level of long-term trend returns. We believe this to be a key component to our competitive edge.

Our valuation model facilitates a transparent and consistent test of sensitivity to changes in trend assumptions. We consider the full history of the company's delivered earnings within the context of the company's competitive landscape and the potential for structural change to its competitive position. It is during this fundamental assessment, that we consider the impact of climate risks on the sustainable trend returns of the business, and where equilibrium assumptions are set by the investment team.

In setting the medium-term equilibrium earnings assumptions for a company, significant effort is put into understanding the quality of management, industry structure, barriers to entry and what might be changing for this company. For example, we test a company's ability to fund its longer-term operations; changes in its level of capital efficiency; its ability to focus on parts of the business that are core to the future drivers of profitability; and the ability and willingness of management to respond in a competitive market environment. These are examples of trend assumptions that may be impacted by transition and physical risks related to climate change.

For example, we are conscious of the environmental headwinds posed by transition risks associated with the auto sector in general and we have explicitly taken transition risks into consideration. In addition to a range of other trend valuation assumptions, we estimate the trend costs businesses are likely to face in relation to carbon transition. For some auto companies, we have significantly increased trend R&D costs into perpetuity. We have also assumed revenues from traditional ICE technologies will be lower into perpetuity, which have implications for lower trend margins into perpetuity. We can test for sensitivity to changes in a range of our trend assumptions to understand the likely drivers of longer-term returns. We also take what the market is pricing today into consideration with these trend valuation concepts to determine our level of confidence or conviction for an investment opportunity.

No

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

Yes

No

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

Yes

No

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

As a TCFD supporter, our parent company, Prudential Plc is in the process of reviewing their enterprise-wide assessment of climate-related risks in its liability book and investment portfolios while also establishing the internal capabilities needed to make enhanced climate-related financial disclosures in future reporting periods, considering the geographical and asset class breadth of its investment activities.

As Prudential plc's Asian asset management arm, we are heavily involved in this process and are reviewing our climate-related financial risk management and reporting capabilities as well.

Eastspring Investments has become a member of a number of collaborative organisations, such as the Asia Investor Group on Climate Change

(AIGCC) and Climate Action 100+ for awareness and capacity building surrounding climate-related issues - both internally and amongst our peers in Asia.

The scope of the process of developing an organisation-wide strategy is significant, given the size and federated nature of Prudential Plc. Whilst we acknowledge this is a journey and there will be opportunities for ongoing improvement, we are motivated to make significant progress in 2020 in terms of the organisation's strategic position (in terms of exposure, fiduciary duty, our beliefs, and goals) as well as the strategic response (in terms of people, policy development, investment processes, and reporting) to climate change.

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

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

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

**SG 02.1** Indicate which of your investment policy documents (if any) are publicly available. Provide a URL and an attachment of the document.

- Policy setting out your overall approach

**URL/Attachment**

- URL  
<https://www.eastspring.com/about-us/responsible-investment>
- Attachment (will be made public)  
Files: [link](#), [link](#)

- Fiduciary (or equivalent) duties

**URL/Attachment**

- URL  
<https://www.eastspring.com/about-us/responsible-investment>
- Attachment (will be made public)  
Files: [link](#)

- Asset class-specific RI guidelines

**URL/Attachment**

- URL  
<https://www.eastspring.com/about-us/responsible-investment>
- Attachment (will be made public)  
Files: [link](#)

- Engagement policy

**URL/Attachment**

- URL  
<https://www.eastspring.com/about-us/responsible-investment>
- Attachment (will be made public)  
Files: [link](#)

- (Proxy) voting policy

**URL/Attachment**

- URL  
<https://www.eastspring.com/about-us/responsible-investment>
- Attachment (will be made public)  
Files: [link](#)

- We do not publicly disclose our investment policy documents

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

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

**URL/Attachment**

- URL  
<https://www.eastspring.com/about-us/responsible-investment>
- Attachment

ESI - Environmental, Social and Corporate Governance Standards March 2020.pdf

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

URL/Attachment	
<input checked="" type="checkbox"/> URL	<a href="https://www.eastspring.com/about-us/responsible-investment">https://www.eastspring.com/about-us/responsible-investment</a>
<input checked="" type="checkbox"/> Attachment	ESI - Environmental, Social and Corporate Governance Standards March 2020.pdf

Time horizon of your investment

Governance structure of organisational ESG responsibilities

URL/Attachment	
<input checked="" type="checkbox"/> URL	<a href="https://www.eastspring.com/about-us/responsible-investment">https://www.eastspring.com/about-us/responsible-investment</a>
<input checked="" type="checkbox"/> Attachment	ESI - Environmental, Social and Corporate Governance Standards March 2020.pdf

ESG incorporation approaches

URL/Attachment	
<input checked="" type="checkbox"/> URL	<a href="https://www.eastspring.com/about-us/responsible-investment">https://www.eastspring.com/about-us/responsible-investment</a>
<input checked="" type="checkbox"/> Attachment	ESI - Environmental, Social and Corporate Governance Standards March 2020.pdf

Active ownership approaches

URL/Attachment	
<input type="checkbox"/> URL	
<input checked="" type="checkbox"/> Attachment	ESI Stewardship Standards.pdf

Reporting

Climate change

URL/Attachment	
<input checked="" type="checkbox"/> URL	<a href="https://www.eastspring.com/about-us/responsible-investment">https://www.eastspring.com/about-us/responsible-investment</a>
<input checked="" type="checkbox"/> Attachment	ESI - Environmental, Social and Corporate Governance Standards March 2020.pdf

We do not publicly disclose any investment policy components

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

For more information, visit our website <https://www.eastspring.com/about-us/responsible-investment>.

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

Yes

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

Eastspring Investments has established appropriate risk management and compliance frameworks to ensure that the interests of clients and beneficiaries are the highest priority, and if conflicts of interest arise they are appropriately managed.

From time to time, proxy voting proposals may raise conflicts between the interests of our clients and the interests of the Company and its employees. We must take certain steps designed to ensure, and must be able to demonstrate that those steps resulted in, a decision to vote the proxies that was based on the clients' best interest and was not the product of the conflict.

Issues raising possible conflicts of interest are referred to the Chief Risk Officer for resolution. Application of the Proxy Voting guidelines or voting in accordance with the proxy advisor recommendation should, in most cases, adequately address any possible conflicts of interest.

In all other cases, the vote should be turned to Chief Risk Officer, who may seek the views of an independent employee within Prudential Group, if necessary. If the conflict of interest to pertain to the Prudential Group then we may see the views of an independent counsel.

No

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

Conflicts of interest may arise when:

- Proxy votes regarding non-routine matters are solicited by an issuer that has an institutional separate account relationship with the Company;
- A proponent of a proxy proposal has a business relationship with the Company;

- The company has business relationships with participants in proxy contests, corporate directors or director candidates;
- An employee of the Company has a personal interest; e.g., through stock ownership, having a spouse working at the Company, etc. in the outcome of a particular matter before shareholders; or
- An employee of the Company has a business or personal relationship with participants in proxy contests, corporate directors or director candidates.

Issues raising possible conflicts of interest are referred to Chief Risk Officer for resolution. Application of these guidelines or voting in accordance with the proxy advisor recommendation should, in most cases, adequately address any possible conflicts of interest.

SG 04	Voluntary	Descriptive	General
SG 04.1	Indicate if your organisation has a process for identifying and managing incidents that occur within investee entities.		
<input checked="" type="radio"/> Yes <input type="radio"/> No			
SG 04.2	Describe your process on managing incidents		
<p>Each of our investment teams has its own approach to integrating ESG matters, which is dependent on the characteristics of each asset class and each investment strategy. All investment professionals are responsible for incorporating all factors deemed to impact the investment decision-making process. As part of this, investment teams are responsible for the integration of ESG issues into the investment process, rather than outsourcing this responsibility to dedicated ESG or stewardship specialists.</p> <p>We utilise third-party ESG data and research vendors in order to assist with the due diligence and ongoing monitoring processes. Our investment teams utilise the services of MSCI ESG Research (as an information source for fundamental research on investee companies as well as to assist with reporting on ESG and Carbon exposures at aggregate levels) and ISS (as a proxy advisor).</p> <p><b>The following relates to the Equity Team:</b></p> <p>We look to identify all material risks to sustainable earnings for a company. We apply judgment around the likely impact of material risks to the longer-term trend valuation of a company. This assessment incorporates the governance of a company, its social behavior, and its environmental impact in our assessment of the drivers of longer-term returns.</p> <p>We invest significant effort into conducting a thorough due diligence on both financial and non-financial aspects of a company.</p> <p>As part of this due diligence we test and monitor aspects such as a company's ability to fund its longer-term operations; changes in its level of capital efficiency; its ability focus on parts of the business that are core to the future drivers of profitability; the ability and willingness of management to respond in a competitive market environment; the likely impacts from potential environmental, social risks and the quality of corporate governance, with an emphasis on the interests of shareholders.</p> <p>Our assessment and ongoing monitoring of ESG factors incorporate information obtained from direct dialogues with investee companies, as well as from access to other external information sources. Where aspects of a company's operations change or an incident occurs that may impact the equity team's longer-term trend assumptions, a review of the company will take place in order to test the level of team conviction around the trend valuation assumptions. This ongoing monitoring and review process will then inform the subsequent investment decision.</p> <p>Implicit in our approach, we do not screen out companies solely on the basis of perceived ESG issues. Whilst the approach is not prohibited from purchasing or holding a position due to an ESG issue, consideration of these issues is made part of the investment decision.</p> <p>Having identified potential risks to sustainable earnings, we may consider an investment where there is sufficient conviction in our fundamental assumptions and where we are more than compensated by valuation support.</p> <p>As part of our proprietary research, we engage companies, including one-on-one meetings with management of companies, and look to influence company management around a range of issues including all matters concerning improving sustainable shareholder returns.</p> <p><b>The following relates to the Fixed Income Team:</b></p> <p>Assessment and monitoring of ESG factors are an integral part of our bottom-up credit research process. ESG issues are incorporated in our fundamental analysis of individual companies to assess their impact on an issuer's financial and operational performance, its risk of default, and the valuation of the bonds it issues. Should an ESG incident occur at a company, the credit analyst will assess the evidence surrounding the incident, determine the likelihood and materiality of potential impact on the company's credit fundamental, engage the company to understand their response to the incident and make appropriate recommendations to the investment team with regards to the bond holdings. The company is placed into the watchlist and will be monitored closely on the development of the incident.</p> <p>For example, in July 2019, the Chairman of a Chinese developer was detained by Shanghai police for criminal charges. This was a governance risk because of the concentrated shareholding and key man risk. The company subsequently announced that he shall be removed as Chairman and will be replaced by his son. The incident was expected to have some impact on the group's reputation and potentially affect near term property sales as well as investor sentiments and funding cost. We met with the new Chairman and management to understand how the company intends to respond to the incident. The expectation was that it has sufficient liquidity to meet near term obligations and will stop land acquisition and dispose assets to conserve cash, hence default risk is low. The analyst's view on the incident was communicated to the team and we continued to hold the bonds. The company was placed into our watchlist and closely monitored for further developments.</p>			

SG 05	Mandatory	Gateway/Core Assessed	General
SG 05.1	Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.		
<input checked="" type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input type="radio"/> Ad-hoc basis <input type="radio"/> It is not set/reviewed			
SG 05.2	Additional information. [Optional]		
<p>We have a rigorous Responsible Investment Framework and Governance Structure in place to oversee the implementation of the UN PRI and our firm-wide RI standards.</p> <p>Our Parent company, Prudential Plc, has <b>Group-wide Responsible Investment Framework (GRIF)</b> which is designed to draw together the ESG-related</p>			

approaches of our asset management businesses (Eastspring in Asia and PPM America in the US) and our asset owner insurance businesses (PCA in Asia and Jackson in the US).

Oversight of the GRIF is the responsibility of our **ESG Executive Committee**, which reports to the **Nomination & Governance Committee of Prudential plc**. The **ESG Executive Committee** maintains our **Group-wide Responsible Investment Standards**, which are based upon our **Group Code of Business Conduct** and sets minimum requirements for each of our business units. These Group-level standards require all of our businesses to develop and maintain their own local responsible investment policies, which capture their own approaches to responsible investment and are appropriate to the jurisdictions in which they operate.

**Eastspring Investments Responsible Investment Taskforce (RIT)** is designated responsibility to oversee Eastspring Investments Responsible Investment activities by the **Eastspring Management Committee (EMC)**.

The **RIT** formally replaces the function of the **Eastspring Responsible Investment Advisory Committee (ERiac)**, which has been dissolved effective 28 February 2020.

The **RIT** provides a forum to determine strategic direction for Responsible Investment and the application of Eastspring Investments Responsible Investment Framework.

The **RIT** is the sponsor for resource allocation to strategic Responsible Investment priorities and projects.

The **RIT** assists the **CEO** and **EMC** in providing oversight of the activities relating to Responsible Investment across **Eastspring Investments Local Business Units (LBU's)**.

The **RIT** promotes the embedding of an appropriate Responsible Investment culture across the LBU's that is consistent with Eastspring Investments fiduciary duty.

The **Eastspring Responsible Investment Working Group (ERIWG)** is a sub-committee of the **RIT**.

The **ERIWG** assumes responsibility for the implementation of **Eastspring Investments Responsible Investment Framework**.

The **ERIWG** acts as a forum to discuss the practical and operational issues encountered in the application of **Eastspring Investments Responsible Investment Framework** and its associated Standards / procedures, and escalate topics as appropriate to the **RIT**.

SG 06	Voluntary	Descriptive	General
SG 06.1 List the main responsible investment objectives that your organisation set for the reporting year.			
Responsible investment processes			
<input checked="" type="checkbox"/> Provide training on ESG incorporation			
Key performance indicator			
Promote RI-related capacity building and training on ESG incorporation			
Progress achieved			
<ul style="list-style-type: none"> <li>• Six ESG workshops in Singapore:</li> <li>• Three workshops on climate change and financial disclosure</li> <li>• ESG integration</li> <li>• ESG vendor methodology</li> <li>• PRI assessment and feedback</li> </ul>			
<input checked="" type="checkbox"/> Provide training on ESG engagement			
Key performance indicator			
Promote RI-related capacity building and training on ESG incorporation			
Progress achieved			
<ul style="list-style-type: none"> <li>• Six ESG workshops in Singapore:</li> <li>• Three workshops on climate change and financial disclosure</li> <li>• ESG integration</li> <li>• ESG vendor methodology</li> <li>• PRI assessment and feedback</li> <li>• Internal ESG Portal as comprehensive ESG resource – RI Policy; academic, industry and competitor content</li> </ul>			
<input type="checkbox"/> Improved communication of ESG activities within the organisation			
<input checked="" type="checkbox"/> Improved engagement to encourage change with regards to management of ESG issues			
Key performance indicator			
Promote the embedding of the Responsible Investment Framework, Governance Structure and Standards into culture across all Local Business Units			
Progress achieved			
<ul style="list-style-type: none"> <li>• ESG engagement logs maintained by investors demonstrate greater internal and external transparency around ongoing engagement</li> </ul>			
<input checked="" type="checkbox"/> Improved ESG incorporation into investment decision making processes			
Key performance indicator			
Promote ESG Integration into investment decision making processes across Asset Classes			
Progress achieved			
<p>Each of our investment teams has its own approach to integrating ESG matters, which is dependent on the characteristics of each asset class and each investment strategy.</p> <p>Accordingly, in 2019, all investment teams across the Local Business Units, have developed ESG policies that formalise their specific approach to ESG issues, and are explicitly integrated into investment processes.</p>			

- Our local business units have developed RI policy alignment with firm-wide RI standards
- Our local business units are working to implement record-keeping of engagement activities and proxy voting
- Two ERIAC and Six RI Taskforce Meetings - Input into strategic direction; sponsor for resource allocation to strategic RI priorities
- Nine ERIWG Meetings – Implementing policy across local business units

- Other, specify (1)
- Other, specify (2)
- Other, specify (3)
- None of the above

**Financial performance of investments**

- Increase portfolio performance by consideration of ESG factors
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)
- None of the above

**ESG characteristics of investments**

- Over or underweight companies based on ESG characteristics
- Improve ESG ratings of portfolio
- Setting carbon reduction targets for portfolio
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)
- None of the above

**Other activities**

- Joining and/or participation in RI initiatives

**Key performance indicator**

Promote Eastspring Investment's reputation and activities as an active owner and steward within the investment industry, by participating in more RI initiatives

**Progress achieved**

- Promoting Responsible Investment
  - Participated in WWF research project
  - Presented at PRI event; contribution to ACGA white papers
  - Joined industry roundtable discussions
- Active ongoing collaboration with PRI; AIGCC; ACGA; CBI; WWF
- Joined Climate Action 100+ in Q1 2020

- Encouraging others to join a RI initiative
- Documentation of best practice case studies
- Using case studies to demonstrate engagement and ESG incorporation to clients
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)
- None of the above

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

**Roles**

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

**Select from the below internal roles**

- Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment



- No oversight/accountability or implementation responsibility for responsible investment
- Other Chief-level staff or head of department, specify
  - All CIOs across the LBUs
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Portfolio managers
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Investment analysts
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Dedicated responsible investment staff
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Investor relations
- Other role, specify (1)
- Other role, specify (2)
- External managers or service providers

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

We have a rigorous Responsible Investment Framework and Governance Structure in place to oversee the implementation of the UN PRI and our firm-wide RI standards. ESI's Chief Investment Officer is a member of the Executive ESG Committee reporting directly to the Prudential Plc Board - ensuring collaboration and alignment of RI strategies and responsibilities between ESI and Prudential Plc.

The **Eastspring Executive Management Committee (EMC)** designates the **Eastspring Investments Responsible Investment Taskforce (RIT)** to oversee our RI activities.

- Formally replaces the function of the Eastspring Responsible Investment Advisory Committee (ERiac), which has been dissolved effective 28 February 2020.
- Provides a forum to determine strategic direction for Responsible Investment and the application of Eastspring Investments Responsible Investment Framework.
- Sponsor for resource allocation to strategic Responsible Investment priorities and projects.
- Assists CEO and EMC in providing oversight of the activities relating to Responsible Investment across Eastspring Investments Local Business Units (LBU's).
- Promotes the embedding of an appropriate Responsible Investment culture across the LBU's that is consistent with Eastspring Investments fiduciary duty.
- Includes cross functional representation including key asset classes and Communications

**ERIWG (Eastspring Responsible Investment Working Group)**

- Consisting of senior representatives across the LBUs – supports and advises the RIT
- Supports LBU implementation of RI Framework
- Utilises collective subject matter expertise in formulating policy
- Provides a forum/guidance relating to the application of the RI Framework
- Meets monthly

**Portfolio Managers/Investment Analysts**

- All investment professionals are responsible for incorporating all factors deemed to impact the investment decision making process.
- As part of this, investment teams are responsible for the integration of ESG issues into the investment process, rather than outsourcing this responsibility to dedicated ESG or stewardship specialists.

**Dedicated RI Specialist**

- Day-to-day implementation of RI-related activities, supports the RIT and ERIWG
- Serves as main contact person for RI-related initiatives and organisations, including the UN PRI
- Supports portfolio managers and client portfolio managers in the preparation of ESG materials
- Collaborate with investment teams to develop and maintain RI content for use in client communication
- Maintenance of ESG materials and facilitate capacity building initiatives
- Collaborate with our peers on industry level initiatives
- Contact point for third-party RI vendors
- Produce thematic RI thought leadership

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

1

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

Board members or trustees	<input checked="" type="checkbox"/> Oversight/accountability for climate-related issues <input type="checkbox"/> Assessment and management of climate-related issues <input type="checkbox"/> No responsibility for climate-related issues
Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Risk Officer (CRO), Investment Committee	<input checked="" type="checkbox"/> Oversight/accountability for climate-related issues <input type="checkbox"/> Assessment and management of climate-related issues <input type="checkbox"/> No responsibility for climate-related issues
Other Chief-level staff or heads of departments	<input checked="" type="checkbox"/> Oversight/accountability for climate-related issues <input type="checkbox"/> Assessment and management of climate-related issues <input type="checkbox"/> No responsibility for climate-related issues
Portfolio managers	<input checked="" type="checkbox"/> Oversight/accountability for climate-related issues <input checked="" type="checkbox"/> Assessment and management of climate-related issues <input type="checkbox"/> No responsibility for climate-related issues
Investment analysts	<input checked="" type="checkbox"/> Oversight/accountability for climate-related issues <input checked="" type="checkbox"/> Assessment and management of climate-related issues <input type="checkbox"/> No responsibility for climate-related issues
Dedicated responsible investment staff	<input type="checkbox"/> Oversight/accountability for climate-related issues <input checked="" type="checkbox"/> Assessment and management of climate-related issues <input type="checkbox"/> No responsibility for climate-related issues

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

**Our Parent company, Prudential Plc**

Our Parent company, Prudential Plc, has **Group-wide Responsible Investment Framework (GRIF)** which is designed to draw together the ESG-related approaches of our asset management businesses (Eastspring in Asia and PPM America in the US) and our asset owner insurance businesses (PCA in Asia and Jackson in the US).

Oversight of the **GRIF** is the responsibility of our **ESG Executive Committee**, which reports to the **Nomination & Governance Committee of Prudential plc**. The **ESG Executive Committee** maintains our **Group-wide Responsible Investment Standards**, which are based upon our **Group Code of Business Conduct** and set minimum requirements for each of our business units. These Group-level standards require all of our businesses to develop and maintain their own local responsible investment policies, which capture their own approaches to responsible investment and are appropriate to the jurisdictions in which they operate.

For management-level roles that assess and manage climate-related issues, provide further information on the structure and processes involved.

**Eastspring Investments**

**Eastspring Investments Responsible Investment Taskforce (RIT)** is designated responsibility to oversee Eastspring Investments Responsible Investment activities by the **Eastspring Management Committee (EMC)**.

The **RIT** formally replaces the function of the **Eastspring Responsible Investment Advisory Committee (ERIAC)**, which has been dissolved effective 28 February 2020.

The **RIT** provides a forum to determine strategic direction for Responsible Investment and the application of Eastspring Investments Responsible Investment Framework.

The **RIT** is the sponsor for resource allocation to strategic Responsible Investment priorities and projects.

The **RIT** assists the **CEO and EMC** in providing oversight of the activities relating to Responsible Investment across **Eastspring Investments Local Business Units (LBU's)**.

The **RIT** promotes the embedding of an appropriate Responsible Investment culture across the LBU's that is consistent with Eastspring Investments fiduciary duty.

The **Eastspring Responsible Investment Working Group (ERIWG)** is a sub-committee of the **RIT**.

The **ERIWG** assumes responsibility for the implementation of Eastspring Investments Responsible Investment Framework.

The **ERIWG** acts as a forum to discuss the practical and operational issues encountered in the application of **Eastspring Investments Responsible Investment Framework** and its associated Standards / procedures, and escalate topics as appropriate to the **RIT**.

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

Board members/Board of trustees	
SG 08.1b	Ri in personal development and/or training plan
<input type="checkbox"/> Responsible investment included in personal development and/or training plan <input checked="" type="checkbox"/> None of the above	
Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee	
SG 08.1a	Ri in objectives, appraisal and/or reward
<input type="checkbox"/> Responsible investment KPIs and/or goals included in objectives <input type="checkbox"/> Responsible investment included in appraisal process <input type="checkbox"/> Variable pay linked to responsible investment performance <input checked="" type="checkbox"/> None of the above	
SG 08.1b	Ri in personal development and/or training plan
<input checked="" type="checkbox"/> Responsible investment included in personal development and/or training plan <input type="checkbox"/> None of the above	
Other C-level staff or head of department	
SG 08.1a	Ri in objectives, appraisal and/or reward
<input type="checkbox"/> Responsible investment KPIs and/or goals included in objectives <input type="checkbox"/> Responsible investment included in appraisal process <input type="checkbox"/> Variable pay linked to responsible investment performance <input checked="" type="checkbox"/> None of the above	
SG 08.1b	Ri in personal development and/or training plan
<input checked="" type="checkbox"/> Responsible investment included in personal development and/or training plan <input type="checkbox"/> None of the above	
Portfolio managers	
SG 08.1a	Ri in objectives, appraisal and/or reward
<input type="checkbox"/> Responsible investment KPIs and/or goals included in objectives <input type="checkbox"/> Responsible investment included in appraisal process <input checked="" type="checkbox"/> Variable pay linked to responsible investment performance <input type="checkbox"/> None of the above	
SG 08.1b	Ri in personal development and/or training plan
<input checked="" type="checkbox"/> Responsible investment included in personal development and/or training plan <input type="checkbox"/> None of the above	
Investment analysts	
SG 08.1a	Ri in objectives, appraisal and/or reward
<input type="checkbox"/> Responsible investment KPIs and/or goals included in objectives <input type="checkbox"/> Responsible investment included in appraisal process <input checked="" type="checkbox"/> Variable pay linked to responsible investment performance <input type="checkbox"/> None of the above	
SG 08.1b	Ri in personal development and/or training plan
<input checked="" type="checkbox"/> Responsible investment included in personal development and/or training plan <input type="checkbox"/> None of the above	
Dedicated responsible investment staff	
SG 08.1a	Ri in objectives, appraisal and/or reward
<input checked="" type="checkbox"/> Responsible investment KPIs and/or goals included in objectives <input checked="" type="checkbox"/> Responsible investment included in appraisal process <input type="checkbox"/> Variable pay linked to responsible investment performance <input type="checkbox"/> None of the above	
SG 08.1b	Ri in personal development and/or training plan
<input checked="" type="checkbox"/> Responsible investment included in personal development and/or training plan	

None of the above

SG 08.3

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

We apply a holistic approach by incorporating material risks, including ESG issues, as part of our investment decision making processes.

SG 09

Mandatory

Core Assessed

PRI 4,5

SG 09.1

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

Principles for Responsible Investment

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

Moderate

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

Eastspring Singapore delivered a case-study at ESG Forum organised by PRI and CFA Institute in Singapore.

Eastspring Singapore held an ESG Workshop with PRI: Eastspring's 2019 assessment, comprising of positive feedback and areas for improvement.

Asian Corporate Governance Association

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

Moderate

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

Eastspring Indonesia engaged with Asian Corporate Governance Association (ACGA) in Indonesia on strategies to improve corporate governance practices related to proxy voting.

Eastspring Singapore contributed to ACGA white paper related to the China equity market.

Eastspring Singapore contributed to ACGA white paper related to the Japan equity market.

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+

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

Basic

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

Eastspring became a member of Climate Action 100+ in February 2020.

Code for Responsible Investment in SA (CRISA)

Council of Institutional Investors (CII)

Eumedion

Extractive Industries Transparency Initiative (EITI)

ESG Research Australia

Invest Europe Responsible Investment Roundtable

Global Investors Governance Network (GIGN)

Global Impact Investing Network (GIIN)

Global Real Estate Sustainability Benchmark (GRESB)

Green Bond Principles

HKVCA: ESG Committee

Institutional Investors Group on Climate Change (IIGCC)

Interfaith Center on Corporate Responsibility (ICCR)

International Corporate Governance Network (ICGN)

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

Basic

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

Eastspring became a member of ICGN in January 2019.

Investor Group on Climate Change, Australia/New Zealand (IGCC)

- International Integrated Reporting Council (IIRC)
- Investor Network on Climate Risk (INCR)/CERES
- Local Authority Pension Fund Forum
- Principles for Financial Action in the 21st Century
- Principles for Sustainable Insurance
- Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify
- Responsible Finance Principles in Inclusive Finance
- Shareholder Association for Research and Education (Share)
- United Nations Environmental Program Finance Initiative (UNEP FI)
- United Nations Global Compact
- Other collaborative organisation/initiative, specify

Asia Investor Group on Climate Change (AIGCC)

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

Moderate

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

Eastspring became a member of AIGCC in January 2019.

Eastspring participated in 9 AIGCC Working Group meetings throughout the year.

Eastspring Singapore held an ESG Workshop with AIGCC and WWF: Climate Change and Enhanced Corporate Disclosure Workshop for investment professionals across the LBU.

Eastspring Singapore participated in Asia Investor Group on Climate Change (AIGCC) CEO/CIO Singapore roundtable on climate change.

- Other collaborative organisation/initiative, specify

Climate Bonds Initiative

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

Basic

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

Eastspring became a member of Climate Bonds Initiative in June 2019.

- Other collaborative organisation/initiative, specify

World Wide Fund for Nature (WWF)

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

Moderate

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

Eastspring Singapore held an ESG Workshop with AIGCC and WWF: Climate Change and Enhanced Corporate Disclosure Workshop for investment professionals across the LBU.

Eastspring Singapore held an ESG Workshop with WWF: Understanding climate change and current disclosure practices - next step on our journey.

Eastspring Singapore attended an ESG Masterclass by CFA and WWF: Unlocking Value Through Active Ownership.

Eastspring Singapore participated in World Wildlife Fund research project: Climate Risk and Sovereign Risk in Southeast Asia: Exploring the Connections and Implications for Financial and Monetary Authorities.

- Other collaborative organisation/initiative, specify

SG 10	Mandatory	Core Assessed	PRI 4
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**SG 10.1** Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.

- Yes

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

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

**Description**

ESG Workshop with AIGCC and WWF: Climate Change and Enhanced Corporate Disclosure Workshop for investment professionals across the LBU  
 ESG Workshop with WWF: Understanding climate change and current disclosure practices - next step on our journey  
 ESG Workshop with ISS Climate: Dr. Max Horster presented on "Investing in times of climate change"  
 ESG Workshop with MSCI: Methodology for MSCI ESG Research  
 ESG Masterclass by CFA and WWF: Unlocking Value Through Active Ownership

**Frequency of contribution**

- Quarterly or more frequently
- Biannually
- Annually

- Less frequently than annually
- Ad hoc
- Other

Provided financial support for academic or industry research on responsible investment

Provided input and/or collaborated with academia on RI related work

Description
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Eastspring Singapore delivered a case-study at ESG Forum organised by PRI and CFA Institute in Singapore. Eastspring Singapore participated in World Wildlife Fund research project: Climate Risk and Sovereign Risk in Southeast Asia: Exploring the Connections and Implications for Financial and Monetary Authorities. Eastspring Singapore contributed to ACGA white paper related to the China equity market. Eastspring Singapore contributed to ACGA white paper related to the Japan equity market.

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

Encouraged better transparency and disclosure of responsible investment practices across the investment industry

Description
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Eastspring Indonesia engaged with Asian Corporate Governance Association (ACGA) in Indonesia on strategies to improve corporate governance practices related to proxy voting. Eastspring Korea joined an asset management panel organised by Korea Ministry of Environment on evaluation of corporate environmental issues. Eastspring Indonesia participated in Kehati Foundation Focus Group Discussion for Sustainable Index, Sustainable Investments and Sustainable Reporting. Eastspring Indonesia and DB organised a Responsible Investment & ESG small group discussion with 14 Indonesian corporates (investee companies) to share about RI, Climate Change and Eastspring's approach to ESG.

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

Spoke publicly at events and conferences to promote responsible investment

Description
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Eastspring Singapore hosted a Bloomberg Buy-side Women's Network on Responsible Investment and ESG Integration. Eastspring Singapore contributed as panel member at Sustainable Finance hosted by Prudential Singapore for its PRUImpact Week. Eastspring Singapore contributed as a panel member at Sustainable Finance in Euromoney's Asia Sustainable & Responsible Capital Markets Forum. Eastspring Singapore delivered a case-study at ESG Forum organised by PRI and CFA Institute in Singapore. Eastspring Indonesia invited as a speaker in Cardno-CRMS Indonesia (Center for Risk Management Studies) Forum on Sustainability to present "Sustainability stories from the financial industry".

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

Wrote and published in-house research papers on responsible investment

Description
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The next frontier: Climate change – <https://www.eastspring.com/insights/the-next-frontier-climate-change> Raising the bar on diversity – <https://www.eastspring.com/insights/raising-the-bar-on-diversity> Climate change and Asia: An existential question? – <https://www.eastspring.com/insights/climate-change-and-asia-an-existential-question> Greening our approach to credit analysis – <https://www.eastspring.com/insights/greening-our-approach-to-credit-analysis> Driving ESG accountability in sovereign bonds – <https://www.eastspring.com/insights/driving-esg-accountability-in-sovereign-bonds>

Frequency of contribution
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- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually

- Ad hoc
- Other

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

Description
Participated in a Round Table discussion with Singapore Institute of International Affairs (SIIA) to support SIIA in the production of a report "Financing Sustainable Infrastructure in ASEAN".

Frequency of contribution
<ul style="list-style-type: none"> <li><input type="checkbox"/> Quarterly or more frequently</li> <li><input type="checkbox"/> Biannually</li> <li><input type="checkbox"/> Annually</li> <li><input type="checkbox"/> Less frequently than annually</li> <li><input checked="" type="checkbox"/> Ad hoc</li> <li><input type="checkbox"/> Other</li> </ul>

- Wrote and published articles on responsible investment in the media
- A member of PRI advisory committees/ working groups, specify
- On the Board of, or officially advising, other RI organisations (e.g. local SIFs)
- Other, specify

No

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

As part of our Responsible Investment journey, Eastspring sought to be more engaged in the industry. We became a member of AIGCC, ICGN, Climate Bond Initiative, and in early 2020, we joined Climate Action 100+.

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

Yes

If yes
<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Yes, individually</li> <li><input checked="" type="checkbox"/> Yes, in collaboration with others</li> </ul>

**SG 11.2 Select the methods you have used.**

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

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

- Yes, publicly available  
<http://www.acga-asia.org/pdf/letter-to-mof-fefta-amendment-bill>

No

No

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

Eastspring actively contributed to the ACGA submission of a letter sent to the Ministry of Finance in Japan to express concerns about the direction and substance of recently proposed amendments to the Foreign Exchange and Foreign Trade Act (FEFTA).

We also supplied feedback to a regulator's closed door consultation paper organised through an industry association.

We have directly met with a number of South East Asia-based regulators in closed door, one on one meetings, as part of information sharing exercises to build capacity.

SG 12	Mandatory	Core Assessed	PRI 4
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**SG 12.1 Indicate whether your organisation uses investment consultants.**

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

SG 13	Mandatory	Descriptive	PRI 1
SG 13.1	Indicate whether the organisation carries out scenario analysis and/or modelling, and if it does, provide a description of the scenario analysis (by asset class, sector, strategic asset allocation, etc.).		
<input checked="" type="checkbox"/> Yes, in order to assess future ESG factors			
		Describe	
<p>Equity - we test for sensitivity in trend valuation to changes in our assumptions to understand what the market is currently pricing. We engage with company management to determine their preparedness and strategic response to potential impacts from ESG risks, where material to the trend drivers of sustainable returns.</p>			
<input checked="" type="checkbox"/> Yes, in order to assess future climate-related risks and opportunities			
		Describe	
<p>Equity - we test for sensitivity in trend valuation to changes in our assumptions to understand what the market is currently pricing. We utilise third party vendor tools to assist in identifying potential carbon impact risks. We are currently testing vendor tools to aid in scenario analysis.</p>			
<input type="checkbox"/> 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	
<input type="checkbox"/> Allocation between asset classes <input type="checkbox"/> Determining fixed income duration <input type="checkbox"/> Allocation of assets between geographic markets <input type="checkbox"/> Sector weightings <input checked="" type="checkbox"/> Other, specify <p style="margin-left: 20px;">Testing a range of top-down, SAA strategies, and considering passive strategies to complement current actively managed bottom up strategies.</p> <input type="checkbox"/> We do not consider ESG issues in strategic asset allocation			
SG 13.3	Additional information. [OPTIONAL]		
<p>To expand on SG 13.2, we are testing a range of top-down, SAA strategies, including testing asset class and geographic allocation, as well as giving consideration to passive strategies to complement our existing actively managed bottom up strategies, which focus on integration and engagement, in order to manage the carbon footprint of the total portfolio.</p>			

SG 13 CC	Mandatory to Report, Voluntary to Disclose	Descriptive	General
SG 13.4 CC	Describe how your organisation is using scenario analysis to manage climate-related risks and opportunities, including how the analysis has been interpreted, its results, and any future plans.		
<input type="checkbox"/> Initial assessment <input type="checkbox"/> Incorporation into investment analysis <input type="checkbox"/> Inform active ownership <input checked="" type="checkbox"/> Other			
		specify	
<p>We are conducting due diligence on third-party vendor scenario analysis tools, which we aim to utilise in climate-related disclosure, consistent with TCFD requirements.</p>			
		Describe	
<p>Currently, our equity team consider the transition pathways to a low-carbon economy via our fundamental assessment of material risks to longer drivers of sustainable earnings.</p> <p>We believe transition and physical risks from climate change may have a meaningful impact to the sustainability of businesses that do not take strategic measures to address them. Financial impacts of climate-related issues are likely to be specific for each company.</p> <p>We engage with company management to determine their preparedness and strategic response to potential impacts from climate change risks, where we see them as material to the trend drivers of sustainable returns. This is incorporated into our qualitative assessment which contributes to the conviction in our trend valuation assumptions. We also test for sensitivity in the trend valuation to potential changes in our assumptions to understand what the market is currently pricing.</p> <p>The following are examples of financial impacts from transition and physical risks that may be incorporated into our trend valuation assumptions where material and are subject to ongoing monitoring and engagement. This is not intended to be an exhaustive list.</p> <p>In a changing competitive environment, impacted by climate-related transition risks, including changing demand, regulatory change and technology change or physical risks, such as disruption of operations, demand or supply for a company's products or services may be materially affected. This has implications for the likely level of longer-term trend returns a company can generate. Our trend valuation assumptions therefore consider changes in sources of revenue over the medium to long term.</p> <p>We consider a company's willingness or ability to adapt to remain competitive in terms of the implications for our trend cost structure assumptions. For example, technology change may impact the level of research and development costs or infrastructure spending incurred by a company on a trend basis.</p> <p>Additionally, there may be implications for a company's long-term plans in relation to managing its assets and liabilities. Impacts from transition risks or physical risks may influence long term strategic decisions around capital investment, restructuring, or impairment of assets.</p> <p>A company's ability to access capital, either through ongoing cashflows or via access to debt may also be impacted by transition or physical risks. For example, an investment in infrastructure or research and development, may impact its capital structure. Potential changes to cost of capital due</p>			



to perceived business risks, may impact a company's ability raise or refinance debt. This in turn, may have implications for dilution of shareholders, should equity be raised in order meet capital requirements.

**SG 13.5 CC** Indicate who uses this analysis.

- Board members, trustees, C-level roles, Investment Committee
- Portfolio managers
- Dedicated responsible investment staff
- External managers
- Investment consultants/actuaries
- Other

**SG 13.6 CC** Indicate whether your organisation has evaluated the potential impact of climate-related risks, beyond the investment time horizon, on its investment strategy.

Yes

**Describe**

We are currently conducting our own due diligence on third-party vendor scenario analysis tools, which we aim to utilise in climate related disclosure, consistent with TCFD requirements. This is part of a collaboration with our parent company (and asset owner), Prudential Plc.

We have not yet embedded the use of a scenario analysis tool into evaluation and disclosure practices in 2019, however this forms part of our RI activities and disclosure goals for 2020.

We are considering the merits of a range of scenario analysis tools, which each appear to offer varying methodologies and focuses.

In terms of transition and physical risk assessment strategies, we are comparing tools for their climate scenarios; impacts from policy and technology risks; potential macro, supply chain, operations, market impacts via exposures, sensitivity and adaptive capacity. We are also considering tools for the quantitative or qualitative analysis, as well as risks from counterparties.

No

**SG 13.7 CC** Indicate whether a range of climate scenarios is used.

- Analysis based on a 2°C or lower scenario
- Analysis based on an abrupt transition, consistent with the Inevitable Policy Response
- Analysis based on a 4°C or higher scenario
- No, a range is not used

**SG 13.8 CC** Indicate the climate scenarios your organisation uses.

Provider	Scenario used	
IEA		
IEA		
IEA		
IEA		
IEA		
IRENA		
Greenpeace		
Institute for Sustainable Development		
Bloomberg		
IPCC		
IPCC		
IPCC		
IPCC		
Other	<input checked="" type="checkbox"/> Other (1)	Other (1) please specify: Currently trialling MSCI Climate Metrics
Other		
Other		

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

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

- Changing demographics
- Climate change

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

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

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

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

- Scenario analysis
- Disclosures on emissions risks to clients/trustees/management/beneficiaries
- Climate-related targets
- Encouraging internal and/or external portfolio managers to monitor emissions risks
- Emissions-risk monitoring and reporting are formalised into contracts when appointing managers
- Weighted average carbon intensity
- Carbon footprint (scope 1 and 2)
- Portfolio carbon footprint
- Total carbon emissions
- Carbon intensity
- Exposure to carbon-related assets
- Other emissions metrics
- Other, specify
- None of the above

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

We use third-party vendor, MSCI Carbon Analytics tool.

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

Metric Type	Coverage	Purpose	Metric Unit	Metric Methodology
<b>Weighted average carbon intensity</b>	Majority of assets	This metric is used to calculate a portfolio's exposure to carbon-intensive companies. This metric can be applied to both equity and fixed income portfolios. Since the metric is agnostic to ownership share, it facilitates a comparison with non-equity classes. This metric helps to indicate a portfolio's exposure to potential climate change-related risks, relative to other portfolios or a benchmark.	tonnes CO2e / \$M sales	The metric is calculated by deriving the sum product of the of the portfolio companies' carbon intensities and weights.
<b>Carbon footprint (scope 1 and 2)</b>	Majority of assets	The metric is used to calculate the normalised measure of a portfolio's contribution to climate change that enables comparisons with a benchmark, between multiple portfolios, and over time, regardless of portfolio size.	tonnes CO2e / \$M Invested	The metric is calculated by summing up the proportionate carbon emissions of portfolio companies based on an investor's ownership share. This is then divided by the total amount invested, adjusted for millions.
<b>Portfolio carbon footprint</b>	Majority of assets	This metric is used to calculate the total carbon emissions for which a portfolio is responsible for.	tonnes CO2e	The metric is calculated by summing up the proportionate carbon emissions of portfolio companies based on an investor's ownership share.
<b>Carbon intensity</b>	Majority of assets	This metric is used to express the carbon efficiency of a portfolio and allows investors to measure how much carbon emissions per dollar of sales are generated by portfolio companies.	tonnes CO2e / \$M sales	Carbon intensity is the ratio of portfolio carbon emissions normalised by the investor's claims on sales.

<b>Exposure to carbon-related assets</b>	Majority of assets	The metric is used to review company level exposures for incorporation into fundamental due diligence.	tonnes CO2e	Various methodologies depending on type of assets – primary methodologies utilised by MSCI ESG reports and company reports.
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**SG 14.8 CC** Indicate whether climate-related risks are integrated into overall risk management and explain the risk management processes used for identifying, assessing and managing climate-related risks.

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

Please describe

We implicitly consider climate-related risks in our bottom up active investment strategies. However, we are currently working towards an alignment with TCFD which includes explicitly incorporating climate-related risks into overall risk management.

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

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

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

**SG 15.1** Indicate if your organisation allocates assets to, or manages, funds based on specific environmental and social themed areas.

- Yes
- No

**SG 16** Mandatory 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
Private equity	Our due diligence of funds incorporates ESG considerations. A full ESG audit of all our funds and direct assets occurs every two years.
Money market instruments	N/A
Other (1) [as defined in Organisational Overview module]	<b>Quantitative Strategies</b> We believe that the quality of corporate governance practices, and how companies manage the environmental and social aspects of their operations, can be material to delivering superior longer-term shareholder value. As such, we incorporate ESG as a formal stream of our research program and ensure that incorporation of ESG factors into our investment processes is always consistent with our fiduciary duty to clients.
Other (2) [as defined in Organisational Overview module]	<b>Multi Asset</b> We approach ESG issues for internally managed assets with two core principles: Transparency and Engagement. We use data sources from MSCI and Aladdin to monitor and report portfolios' overall ESG measures and then collaborating closely with our clients to agree on achieving a balanced target of return, risk, and ESG metrics for the portfolios.

**SG 18** Voluntary Descriptive General

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

- Yes
- No

**SG 19** Mandatory 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.

Listed equity - Incorporation

Do you disclose?

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

The information disclosed to clients/beneficiaries is the same

- Yes

✓ No

Disclosure to public and URL	Disclosure to clients/beneficiaries
<p><b>Disclosure to public and URL</b></p> <p><input type="radio"/> Broad approach to ESG incorporation</p> <p><input checked="" type="radio"/> Detailed explanation of ESG incorporation strategy used</p>	<p><b>Disclosure to clients/beneficiaries</b></p> <p><input type="radio"/> Broad approach to ESG incorporation</p> <p><input checked="" type="radio"/> Detailed explanation of ESG incorporation strategy used</p>
Annually	Ad-hoc/when requested
<a href="https://www.eastspring.com/about-us/responsible-investment">https://www.eastspring.com/about-us/responsible-investment</a>	

Listed equity - Engagement

Do you disclose?

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

The information disclosed to clients/beneficiaries is the same

- Yes
- No

Disclosure to public and URL	Disclosure to clients/beneficiaries
<p><b>Disclosure to public and URL</b></p> <p><input checked="" type="checkbox"/> Details on the overall engagement strategy</p> <p><input checked="" type="checkbox"/> Details on the selection of engagement cases and definition of objectives of the selections, priorities and specific goals</p> <p><input type="checkbox"/> Number of engagements undertaken</p> <p><input type="checkbox"/> Breakdown of engagements by type/topic</p> <p><input type="checkbox"/> Breakdown of engagements by region</p> <p><input type="checkbox"/> An assessment of the current status of the progress achieved and outcomes against defined objectives</p> <p><input type="checkbox"/> Examples of engagement cases</p> <p><input type="checkbox"/> Details on eventual escalation strategy taken after the initial dialogue has been unsuccessful (i.e. filing resolutions, issuing a statement, voting against management, divestment etc.)</p> <p><input type="checkbox"/> Details on whether the provided information has been externally assured</p> <p><input type="checkbox"/> Outcomes that have been achieved from the engagement</p> <p><input type="checkbox"/> Other information</p>	<p><b>Disclosure to clients/beneficiaries</b></p> <p><input checked="" type="checkbox"/> Details on the overall engagement strategy</p> <p><input checked="" type="checkbox"/> Details on the selection of engagement cases and definition of objectives of the selections, priorities and specific goals</p> <p><input type="checkbox"/> Number of engagements undertaken</p> <p><input type="checkbox"/> Breakdown of engagements by type/topic</p> <p><input type="checkbox"/> Breakdown of engagements by region</p> <p><input type="checkbox"/> An assessment of the current status of the progress achieved and outcomes against defined objectives</p> <p><input checked="" type="checkbox"/> Examples of engagement cases</p> <p><input type="checkbox"/> Details on eventual escalation strategy taken after the initial dialogue has been unsuccessful (i.e. filing resolutions, issuing a statement, voting against management, divestment etc.)</p> <p><input type="checkbox"/> Details on whether the provided information has been externally assured</p> <p><input checked="" type="checkbox"/> Outcomes that have been achieved from the engagement</p> <p><input type="checkbox"/> Other information</p>
Annually	Ad-hoc/when requested
<a href="https://www.eastspring.com/about-us/responsible-investment">https://www.eastspring.com/about-us/responsible-investment</a>	

Listed equity – (Proxy) Voting

Do you disclose?

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

The information disclosed to clients/beneficiaries is the same

- Yes
- No

Disclosure to public and URL	Disclosure to clients/beneficiaries
<p><b>Disclosure to public and URL</b></p> <p><input checked="" type="checkbox"/> Disclose all voting decisions</p> <p><input type="checkbox"/> Disclose some voting decisions</p> <p><input type="checkbox"/> Only disclose abstentions and votes against management</p>	<p><b>Disclosure to clients/beneficiaries</b></p> <p><input checked="" type="checkbox"/> Disclose all voting decisions</p> <p><input type="checkbox"/> Disclose some voting decisions</p> <p><input type="checkbox"/> Only disclose abstentions and votes against management</p>

Annually	Ad hoc/when requested
<a href="https://www.eastspring.com/about-us/responsible-investment">https://www.eastspring.com/about-us/responsible-investment</a>	

**Fixed income**

**Do you disclose?**

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

**The information disclosed to clients/beneficiaries is the same**

- Yes
- No

Disclosure to public and URL	Disclosure to clients/beneficiaries
<p><b>Disclosure to public and URL</b></p> <ul style="list-style-type: none"> <li><input type="radio"/> Broad approach to RI incorporation</li> <li><input checked="" type="radio"/> Detailed explanation of RI incorporation strategy used</li> </ul>	<p><b>Disclosure to clients/beneficiaries</b></p> <ul style="list-style-type: none"> <li><input type="radio"/> Broad approach to RI incorporation</li> <li><input checked="" type="radio"/> Detailed explanation of RI incorporation strategy used</li> </ul>
Annually	Ad hoc/when requested
<a href="https://www.eastspring.com/about-us/responsible-investment">https://www.eastspring.com/about-us/responsible-investment</a>	

SG Checks

Checks

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

LEI 01.1	Indicate which ESG incorporation strategy and/or combination of strategies you apply to your actively managed listed equities; and the breakdown of your actively managed listed equities by strategy or combination of strategies.
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- Screening alone (i.e., not combined with any other strategies)
  - Thematic alone (i.e., not combined with any other strategies)
  - Integration alone (i.e., not combined with any other strategies)
- |   |      |
|---|------|
| Percentage of active listed equity to which the strategy is applied – you may estimate +/- 5% | 100% |
|---|------|
- Screening and integration strategies
  - Thematic and integration strategies
  - Screening and thematic strategies
  - All three strategies combined
  - We do not apply incorporation strategies

LEI 02.1	Indicate what ESG information you use in your ESG incorporation strategies and who provides this information.
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- Raw ESG company data
  - ESG research provider
  - Sell-side
  - In-house – specialised ESG analyst or team
  - In-house – analyst or portfolio manager
- Company-related analysis or ratings
  - ESG research provider
  - Sell-side
  - In-house – specialised ESG analyst or team
  - In-house – analyst or portfolio manager
- Sector-related analysis or ratings
  - ESG research provider
  - Sell-side
  - In-house – specialised ESG analyst or team
  - In-house – analyst or portfolio manager
- Country-related analysis or ratings
  - ESG research provider
  - Sell-side
  - In-house – specialised ESG analyst or team
  - In-house – analyst or portfolio manager
- Screened stock list
- ESG issue-specific analysis or ratings
  - ESG research provider
  - Sell-side
  - In-house – specialised ESG analyst or team
  - In-house – analyst or portfolio manager
- Other, specify

LEI 02.2	Indicate whether you incentivise brokers to provide ESG research.
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- Yes
- No

LEI 02.4	Additional information. [Optional]
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We look to identify all material risks to sustainable earnings for a company. We apply judgment around the likely impact of material risks to the longer term trend valuation of a company. This assessment incorporates the governance of a company, its social behavior, and its environmental impact in our assessment of the drivers of longer term returns. We invest significant effort into conducting a thorough due diligence on both financial and non-financial aspects of a company.

As part of this due diligence we test aspects such as a company's ability to fund its longer term operations; changes in its level of capital efficiency; its ability focus on parts of the business that are core to the future drivers of profitability; the ability and willingness of management to respond in a competitive market environment; the likely impacts from potential environmental, social risks and the quality of corporate governance, with an emphasis on the interests of shareholders.

Our assessment and ongoing monitoring of ESG factors incorporates information obtained from direct dialogues with investee companies, as well as from

access to other external information sources.

We currently also utilise MSCI ESG Research and Institutional Shareholder Services.

LEI 03	Voluntary	Additional Assessed	PRI 1
LEI 03.1	Indicate whether your organisation has a process through which information derived from ESG engagement and/or (proxy) voting activities is made available for use in investment decision-making.		
<input checked="" type="checkbox"/> Engagement <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> We have a systematic process to ensure the information is made available.</li> <li><input type="checkbox"/> We occasionally make this information available.</li> <li><input type="checkbox"/> We do not make this information available.</li> </ul>			
<input checked="" type="checkbox"/> (Proxy) voting <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> We have a systematic process to ensure the information is made available.</li> <li><input type="checkbox"/> We occasionally make this information available.</li> <li><input type="checkbox"/> We do not make this information available.</li> </ul>			
LEI 03.2	Additional information. [Optional]		
<p>We believe investment professionals are in the best position to evaluate all material risks to sustainable earnings of a company and issues that may have on long-term shareholder value. Engagement and proxy voting activities are integral to the investment process and therefore the responsibility of the equity team, rather than being delegated to ESG or stewardship specialists.</p> <p>Furthermore, records of all engagement activities, votes, the proxy advisor recommendations and where appropriate, written approvals are maintained centrally.</p>			

LEI 08	Mandatory	Core Assessed	PRI 1																																						
LEI 08.1	Indicate the proportion of actively managed listed equity portfolios where E, S and G factors are systematically researched as part of your investment analysis.																																								
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LEI 08.2	Additional information. [Optional]																																								
<p>ESG issues are incorporated into our fundamental analysis and decision-making process when we believe they could have a material impact on a company's valuation and financial performance. We look to identify all material risks to sustainable earnings for a company. We apply judgment around the likely impact of material risks to the longer term trend valuation of a company. We invest significant effort into conducting a thorough due diligence on both financial and non-financial aspects of a company. This assessment incorporates the governance of a company, its social behavior, and its environmental impact in our assessment of the drivers of longer term returns.</p> <p>Our assessment and ongoing monitoring of ESG factors incorporates information obtained from direct dialogues with investee companies, as well as from access to other external information sources.</p>																																									

LEI 09	Mandatory	Core Assessed	PRI 1
LEI 09.1	Indicate which processes your organisation uses to ensure ESG integration is based on robust analysis.		
<input checked="" type="checkbox"/> Comprehensive ESG research is undertaken or sourced to determine companies' activities and products <input checked="" type="checkbox"/> Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies <input checked="" type="checkbox"/> Third-party ESG ratings are updated regularly <input checked="" type="checkbox"/> A periodic review of the internal research is carried out <input type="checkbox"/> Structured, regular ESG specific meetings between responsible investment staff and the fund manager or within the investments team			

- ESG risk profile of a portfolio against benchmark
- Analysis of the impact of ESG factors on investment risk and return performance
- Other; specify

All investment professionals are responsible for ESG integration. Our holistic fundamental approach is to identify all material risks, including ESG issues, to sustainable trend earnings.

None of the above

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

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

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

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

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

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

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

- ESG information is held within centralised databases or tools, and it is accessible by all relevant staff
- ESG information or analysis is a standard section or aspect of all company research notes or industry/sector analysis generated by investment staff
- Systematic records are kept that capture how ESG information and research were incorporated into investment decisions
- Other; specify

Our assessment and ongoing monitoring of ESG factors incorporates information obtained from direct dialogues with investee companies, as well as from external ESG information sources.

None of the above

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

We look to identify all material risks to sustainable earnings. We apply judgment around the likely impact of material risks to the longer-term trend valuation of a company. This assessment incorporates the governance of a company, its social behavior, and its environmental impact in our assessment of the drivers of longer term returns.

We invest significant effort into conducting a thorough due diligence on both financial and non-financial aspects. We test aspects such as a company's ability to fund its longer-term operations; changes in its level of capital efficiency; ability to focus on core drivers of profitability; ability and willingness of management to respond in a competitive market environment; including the likely impacts to these aspects from potential environmental, social risks and the quality of corporate governance, with an emphasis on the interests of shareholders.

Implicit in our approach, we do not screen out companies solely based on perceived ESG issues. Whilst the approach is not prohibited from purchasing or holding a position due to an ESG issue, consideration of these issues is made part of the investment decision.

We engage companies, including one-on-one meetings with management, and look to influence company management on matters concerning improving sustainable shareholder returns.

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

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

- Economic analysis

Proportion of actively managed listed equity exposed to investment analysis

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

- Industry analysis

Proportion of actively managed listed equity exposed to investment analysis

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



>90%

Quality of management

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

Analysis of company strategy

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

Portfolio weighting

Security sensitivity and/or scenario analysis

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

Fair value/fundamental analysis

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

Other; specify

**LEI 10.2** Indicate which methods are part of your process to integrate ESG information into fair value/fundamental analysis.

- Adjustments to forecasted company financials (sales, operating costs, earnings, cash flows)
- Adjustments to valuation-model variables (discount rates, terminal value, perpetuity growth rates)
- Valuation multiples
- Other adjustments; specify

Use a range of valuations metrics to test trend assumptions via sensitivity analysis. We apply a single discount rate to determine what market is pricing.

**LEI 10.4** Describe the methods you have used to adjust the income forecast/valuation tool.

Proprietary financial models allow the team to assess consistently a company's financial history, and its accounting procedures, adjusting where necessary.

In addition, the financial model requires future returns from the business to be faded to an equilibrium level. As a result, the valuation model is not dependant on the accuracy of forecasting future returns, but facilitates an understanding of the price of a company with respect to a sustainable level of trend returns. We believe this to be a key component to our competitive edge.

The transparency of this process is important in supporting robust peer review of research.

The output from this process includes:

- Absolute valuation based on a discounted cash flow analysis – an important anchor for valuation as it is not dependent on short-term changes in market confidence;
- Assessment of relative valuations, such as the current price/earnings multiple, against both peers and the company's own history;
- Expectations analysis to derive information implicit in the current price, which tests a range of potential evidence-based outcomes, both financial and non-financial aspects of the company, including the likely impacts from potential environmental, social risks and the quality of corporate governance, with an emphasis on the interests of shareholders.

**LEI 10.5** Describe how you apply sensitivity and /or scenario analysis to security valuations.

Valuation tools are an objective medium by which to consistently and transparently test our judgment.

The valuation model facilitates a transparent and consistent test of sensitivity to changes in trend assumptions.

We consider the full history of the company's delivered earnings within the context of the company's competitive landscape and the potential for structural change to its competitive position, including impact from ESG considerations.

Additionally, we acknowledge that there is no single true or correct valuation for an asset. As a result, we choose to use a range of valuation methodologies to test sensitivity to changes in our trend assumptions incorporating financial and non-financial considerations.

Our approach is to anchor our decisions around what the market is already "pricing" for an asset and we ensure that we are being amply compensated for observed risks with significant valuation upside. This enables our approach to actively exploit inconsistent pricing beliefs and comfort, or concerns, of

others.

Our focus on sustainable earnings differentiates us from a market that obsesses over recently reported earnings. The market's myopic view on recently reported earnings is the source of the local representativeness bias that drives the extrapolation of trends, and ultimately gives rise to herding behaviour.

LEI 10.6

Additional information. [OPTIONAL]

We conduct meetings with company management in order to understand how companies are using their capital and conducting their business. We may engage with company management on a variety of issues, including ESG matters that present a potential material risk to a company's financial performance.

Our decision to engage is primarily based on what we believe will maximise shareholder value as long term investors.

From time to time, companies may seek our input on a range of issues, and where appropriate, we may play an active role in seeking to effect changes that maximise shareholder value.

We believe investment professionals are in the best position to evaluate all material risks to sustainable earnings of a company and issues that may have on long-term shareholder value. Engagement activities are integral to the investment process and therefore the responsibility of the equity team, rather than being delegated to ESG or stewardship specialists.

LEI Checks

Checks

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

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

Yes

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

Attachment provided:

Files: link

URL provided:

LEA 01.3 Indicate what your active engagement policy covers:

#### General approach to Active Ownership

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

#### Engagement

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

(Proxy) voting approach

#### Voting

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

Other

None of the above

No

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

Yes

No

LEA 01.6 Additional information [optional]

N.B. The Singapore-based Equity team has an Environmental, Social and Corporate Governance (ESG) Policy document; a Stewardship Policy document; and a Proxy Voting Policies and Procedures document.

The Equity team is also subject to the firm-wide Eastspring Investments Stewardship Standards; Eastspring Investments Environmental, Social and Corporate Governance Standards; Eastspring Investments Proxy Voting Standards; and Eastspring Investments Best Execution Standards.

Eastspring Investments seeks to add value for its clients by pursuing an active investment policy through portfolio management decisions, through voting on resolutions at general meetings and by maintaining a continuing dialogue with company management. Meetings with companies will therefore occur on a regular basis. This enables us to monitor company development over time and assess progress against objectives.

#### Stewardship

As a fiduciary to our clients, Eastspring Investments seeks to act in clients' best interests and treat each client fairly at all times. This is interpreted as the best financial interest of the client, and this principle underlies all aspects of our investment process.

We recognise the importance of accountability to our clients for the stewardship of their assets. We aim to generate long-term capital growth on the assets investors entrust to us by pursuing an active investment policy through portfolio management decisions.

We believe that the quality of corporate governance practices, and how companies manage the environmental and social aspects of their operations, can be material to delivering superior longer-term shareholder value. Stewardship helps to promote high standards of corporate governance which contributes to sustainable value creation. Stewardship contributes to preserving and enhancing long-term value as part of a responsible investment approach. This includes the consideration of wider ethical, environmental and social factors as core components of fiduciary duty. Stewardship can enhance overall financial market stability and economic growth.

As a member of International Corporate Governance Network (ICGN) our stewardship approach is aligned with the ICGN Global Stewardship Principles and ICGN Global Governance Principles.

Eastspring Investments is supportive of the application of Stewardship Codes in markets where we operate.

Where applicable, we have developed policies to inform how we fulfil our stewardship responsibilities in respect of a particular Stewardship Code.

### Engagement

Engagement is core to our Stewardship responsibilities. We aim to encourage business and management practices that support sustainable financial performance through constructive engagement based on our in-depth knowledge of the companies and their business environment.

We apply a holistic approach to identifying material risks—including Environmental Social and Governance (ESG) issues—to the sustainable earnings of a company. Factors that impact longer term sustainable earnings will differ across companies and are only incorporated into our fundamental analysis and decision-making process when we believe they could have a material impact on a company's valuation and financial performance.

Value realisation is encouraged via ongoing engagement with the company regarding material issues. The nature and level of engagement will therefore vary from company to company, based on materiality of risks to sustainable earnings.

A patient timeframe can improve the probability of outcomes. We believe our focused, valuation-driven approach is clearly aligned with stewardship activities, including ongoing company engagement, for shareholder value realisation over the longer term.

We place a high level of importance on an ongoing dialogue with investee companies primarily based on what we believe will maximise shareholder value as long-term investors.

We believe investment professionals are in the best position to evaluate all material risks to sustainable earnings of a company and issues that may have an impact on long-term shareholder value. Engagement activities are integral to the investment process and therefore the responsibility of the equity team, rather than being delegated to ESG or stewardship specialists.

Where appropriate, we will play an active role in seeking to effect changes to maximise shareholder value.

### Proxy Voting

We aim to generate long-term capital growth on the assets investors entrust to us by pursuing an active investment policy through portfolio management decisions, through voting on resolutions at general meetings and by maintaining a continuing dialogue with company management.

As a general policy we are supportive of the management of the companies in which we invest. However, when companies consistently fail to achieve our reasonable expectations we will actively promote changes. These changes might range from the formulation of a new strategy to the appointment of new management or non-executive directors.

An active and informed voting policy is an integral part of our investment philosophy. Voting should never be divorced from the underlying investment activity. By exercising our votes we seek both to add value and to protect our interests as shareholders. We consider the issues, meet the management if necessary and vote accordingly.

We would always seek to discuss any contentious resolutions before casting our votes in order to ensure that our objectives are understood and our votes will be cast in the best interests of our clients. To aid the process of making proxy voting decisions, we use a proxy advisor.

We review, from time to time, the policies and guidelines of the proxy advisor to understand the nature of their recommendations and test their compatibility with our requirements. However, specific policies and advice from the proxy advisor are not applied mechanically. We always apply our judgment and decide how to vote each resolution on its merits in the context of principles of our proxy policy.

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

LEA 02.4	Additional information. [Optional]
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Engagement is core to our Stewardship responsibilities. We aim to encourage business and management practices that support sustainable financial

performance through constructive engagement based on our in-depth knowledge of the companies and their business environment.

We apply a holistic approach to identifying material risks—including Environmental Social and Governance (ESG) issues—to the sustainable earnings of a company. Factors that impact longer term sustainable earnings will differ across companies and are only incorporated into our fundamental analysis and decision-making process when we believe they could have a material impact on a company's valuation and financial performance.

Value realisation is encouraged via ongoing engagement with the company regarding material issues. The nature and level of engagement will therefore vary from company to company, based on materiality of risks to sustainable earnings.

We conduct meetings with company management in order to understand how companies are using their capital and conducting their business. We may engage with company management on a variety of issues, including ESG matters that present a potential material risk to a company's financial performance. Our decision to engage is primarily based on what we believe will maximise shareholder value as long-term investors.

From time to time, companies may seek our input on a range of issues, and where appropriate, we may play an active role in seeking to effect changes that maximise shareholder value.

We believe investment professionals are in the best position to evaluate all material risks to sustainable earnings of a company and issues that may have on long-term shareholder value. Engagement activities are integral to the investment process and therefore the responsibility of the equity team, rather than being delegated to ESG or stewardship specialists.

We have classified service providers to be ISS and MSCI ESG Research. We do not utilise either vendor in company engagements. We are active members of collaborative organisations including (amongst others) ACGA, ICGN, and AIGCC, where we provide direct input into their engagements with companies and regulatory bodies. From time to time, we may participate in collaborative engagement initiatives where we believe it to be in our client's best interests to do so.

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

LEA 03.2	Indicate the criteria used to identify and prioritise engagements for each type of engagement.
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Type of engagement	Criteria used to identify/prioritise engagements
Individual / Internal staff engagements	Individual / Internal staff engagements
	<ul style="list-style-type: none"> <li><input type="checkbox"/> Geography/market of the companies</li> <li><input checked="" type="checkbox"/> Materiality of the ESG factors</li> <li><input checked="" type="checkbox"/> Exposure (size of holdings)</li> <li><input checked="" type="checkbox"/> Responses to ESG impacts that have already occurred</li> <li><input type="checkbox"/> Responses to divestment pressure</li> <li><input checked="" type="checkbox"/> Consultation with clients/beneficiaries</li> <li><input checked="" type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.)</li> <li><input checked="" type="checkbox"/> Follow-up from a voting decision</li> <li><input checked="" type="checkbox"/> Client request</li> <li><input type="checkbox"/> Breaches of international norms</li> <li><input type="checkbox"/> Other; (specify)</li> <li><input type="checkbox"/> We do not outline engagement criteria for our individual engagements</li> </ul>
Collaborative engagements	Collaborative engagements
	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Potential to enhance knowledge of ESG issues through other investors</li> <li><input checked="" type="checkbox"/> Ability to have greater impact on ESG issues</li> <li><input checked="" type="checkbox"/> Ability to add value to the collaboration</li> <li><input type="checkbox"/> Geography/market of the companies targeted by the collaboration</li> <li><input checked="" type="checkbox"/> Materiality of the ESG factors addressed by the collaboration</li> <li><input checked="" type="checkbox"/> Exposure (size of holdings) to companies targeted by the collaboration</li> <li><input checked="" type="checkbox"/> Responses to ESG impacts addressed by the collaboration that have already occurred</li> <li><input type="checkbox"/> Responses to divestment pressure</li> <li><input checked="" type="checkbox"/> Follow-up from a voting decision</li> <li><input type="checkbox"/> Alleviate the resource burden of engagement</li> <li><input checked="" type="checkbox"/> Consultation with clients/beneficiaries</li> <li><input checked="" type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.)</li> <li><input type="checkbox"/> Other; (specify)</li> <li><input type="checkbox"/> We do not outline engagement criteria for our collaborative engagement providers</li> </ul>

No

LEA 03.3	Additional information. [Optional]
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We believe investment professionals are in the best position to evaluate all material risks to sustainable earnings of a company and issues that may have on long-term shareholder value. Engagement activities are integral to the investment process and therefore the responsibility of the equity team, rather than being delegated to ESG or stewardship specialists.

Our decision to engage is primarily based on what we believe will maximise shareholder value as long-term investors.

We conduct meetings with company management in order to understand how companies are using their capital and conducting their business. We may engage with company management on a variety of issues, including ESG matters that present a potential material risk to a company's financial performance.

From time to time, companies may seek our input on a range of issues, and where appropriate, we may play an active role in seeking to effect changes that maximise shareholder value.

We have classified service providers to be ISS and MSCI ESG Research. We do not utilise either vendor in company engagements. We are active members of collaborative organisations including (amongst others) ACGA, ICGN, and AIGCC, where we provide direct input into their engagements with companies and regulatory bodies. From time to time, we may participate in collaborative engagement initiatives where we believe it to be in our client's best interests to do so.

LEA 04	Mandatory	Core Assessed	PRI 2
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LEA 04.1	Indicate whether you define specific objectives for your organisation's engagement activities.
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Individual / Internal staff engagements	<input checked="" type="checkbox"/> All engagement activities <input type="checkbox"/> Majority of engagement activities <input type="checkbox"/> Minority of engagement activities <input type="checkbox"/> We do not define specific objectives for engagement activities carried out by internal staff
Collaborative engagements	<input checked="" type="checkbox"/> All engagement activities <input type="checkbox"/> Majority of engagement activities <input type="checkbox"/> Minority of engagement activities <input type="checkbox"/> We do not define specific objectives for engagement activities carried out through collaboration

LEA 04.2	Additional information. [Optional]
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Our decision to engage is primarily based on what we believe will maximise shareholder value as long term investors.

We conduct meetings with company management with an objective to understand how companies are using their capital and conducting their business. We may engage with company management on a variety of issues, including ESG matters that present a potential material risk to a company's financial performance.

We have classified service providers to be ISS and MSCI ESG Research. We do not utilise either vendor in company engagements. We are active members of collaborative organisations including (amongst others) ACGA, ICGN, and AIGCC, where we provide direct input into their engagements with companies and regulatory bodies. From time to time, we may participate in collaborative engagement initiatives where we believe it to be in our client's best interests to do so.

LEA 05	Mandatory	Core Assessed	PRI 2
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LEA 05.1	Indicate whether you monitor and/or review engagement outcomes.
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Individual / Internal staff engagements	<input checked="" type="checkbox"/> Yes, in all cases <input type="checkbox"/> Yes, in a majority of cases <input type="checkbox"/> Yes, in a minority of cases <input type="checkbox"/> We do not monitor, or review engagement outcomes when the engagement is carried out by our internal staff.
Collaborative engagements	<input checked="" type="checkbox"/> Yes, in all cases <input type="checkbox"/> Yes, in a majority of cases <input type="checkbox"/> Yes, in a minority of cases <input type="checkbox"/> We do not monitor, or review engagement outcomes when the engagement is carried out through collaboration.

LEA 05.2	Indicate whether you do any of the following to monitor and/or review the progress of engagement activities.
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Individual / Internal staff engagements	<input type="checkbox"/> Define timelines/milestones for your objectives <input checked="" type="checkbox"/> Track and/or monitor progress against defined objectives and/or KPIs <input checked="" type="checkbox"/> Track and/or monitor the progress of action taken when original objectives are not met <input checked="" type="checkbox"/> Revisit and, if necessary, revise objectives on a continuous basis <input type="checkbox"/> Other; specify
Collaborative engagements	<input type="checkbox"/> Define timelines/milestones for your objectives <input checked="" type="checkbox"/> Track and/or monitor progress against defined objectives and/or KPIs <input checked="" type="checkbox"/> Track and/or monitor the progress of action taken when original objectives are not met <input checked="" type="checkbox"/> Revisit and, if necessary, revise objectives on a continuous basis <input type="checkbox"/> Other; specify

LEA 05.3	Additional information. [Optional]
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We utilise internal and external resources to assist in the analysis of material ESG issues which are incorporated into decision making and engagement

activities.

As part of the ongoing evolution of the Policy, we continue to assess external sources of information to ensure our approach has the appropriate tools to aid in applying our best judgment. Currently, we utilise the following external service providers:

- MSCI ESG Research
- Institutional Shareholder Services

We have classified service providers to be ISS and MSCI ESG Research. We do not utilise either vendor in company engagements. We are active members of collaborative organizations including (amongst others) ACGA, ICGN, and AIGCC, where we provide direct input into their engagements with companies and regulatory bodies. From time to time, we may participate in collaborative engagement initiatives where we believe it to be in our client's best interests to do so.

LEA 06	Mandatory	Additional Assessed	PRI 2,4
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LEA 06.1	Indicate whether your organisation has an escalation strategy when engagements are unsuccessful.
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Yes

LEA 06.2	Indicate the escalation strategies used at your organisation following unsuccessful engagements.
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- Collaborating with other investors
- Issuing a public statement
- Filing/submitting a shareholder resolution
- Voting against the re-election of the relevant directors
- Voting against the board of directors or the annual financial report
- Submitting nominations for election to the board
- Seeking legal remedy / litigation
- Reducing exposure (size of holdings)
- Divestment
- Other; specify

Engagement is integral to patient investment process incorporating price and trend valuation. May impact our conviction level based on materiality of risks to sustainable returns.

No

LEA 06.3	Additional information. [Optional]
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Our equity team identifies significantly mispriced opportunities based on long-term relative valuation. Our focused research helps us to understand the sources of market mispricing through deep fundamental analysis.

In addition to exploiting significant price episodes, we invest a significant amount of effort into conducting a thorough due diligence on both the financial and nonfinancial aspects of a company. In building our fundamental assumptions that underpin the valuation for a company, we apply a holistic approach to identifying material risks-including ESG issues-to the sustainable earnings of a company. We rely on the robustness of our proprietary fundamental research process and apply our judgment to assess material factors that impact sustainable earnings. We require significant valuation support to compensate for material risks to longer-term sustainable earnings.

ESG issues and their potential impact differ across companies and are only incorporated into our fundamental analysis and decision-making process when we believe they could have a material impact on a company's valuation and financial performance. We have adopted tools that assist in the efficient identification of ESG issues related to the companies we research. We currently use the MSCI ESG Research tool to assist in our deep due diligence, which includes preparation for company engagement.

As part of our due diligence, we test aspects that are material to a company's ability to fund its longer-term operations: changes in its level of capital efficiency; its ability focus on parts of the business that are core to the future drivers of profitability; the ability and willingness of management to respond in a competitive market environment; potential impacts from the quality of corporate governance; and the risks associated with environmental and social business performance that may impact a company's "social agency" – its ongoing franchise and the likely impact of management's behaviour on longer-term returns. We test the sensitivity of our valuation to changes in our trend assumptions, which inform the level of confidence (or conviction) we may gain for the longer-term trend valuation of a company.

Implicit in our approach is that we do not screen out companies solely on the basis of perceived problematic ESG issues. Although this approach does not prohibit us from purchasing or holding a position due to an ESG issue, consideration of these issues is made part of the investment decision.

Having identified potential risks to sustainable earnings, we may consider an investment where there is sufficient conviction in our fundamental assumptions and where we are more than compensated by valuation support.

A patient timeframe can improve the probability of outcomes. We believe our focused, valuation-driven approach is clearly aligned with stewardship activities, including ongoing company engagement, for shareholder value realisation over the longer-term. Our approach is aligned with promoting increased long-term value creation and sustainable business practices by companies. The approach focuses principally on long-term factors that determine companies' earnings, rather than on the short-term factors that may predominate in determining share prices. We place a high level of importance on an ongoing dialogue with investee companies primarily based on what we believe will maximise shareholder value as long-term investors.

**Engagement Escalation**

Judgement is applied in all company engagements and the strategy for escalation will be determined by the specific circumstances of each company. We do not apply a prescriptive or mechanistic approach to engagement escalation.

Where we have concerns around the company's progress, our ongoing engagement will include direct dialogues between Portfolio Managers and the appropriate corporate representatives or non-executive directors. The following are typical engagement escalation measures we may choose to employ.

We may express our concerns to company management collectively with other investors. We are active members of collaborative organisations. From time to time, we may participate in collaborative engagement initiatives where we believe it to be in our client's best interests to do so.

We may make a public statement about our concerns, where we believe it to be in our client's best interests to do so.

Additionally, we may submit shareholder resolutions in order to address our concerns.

Our active proxy voting decisions are used as a signal to companies around our expectations. By exercising our votes, we seek both to add value and to

protect our interests as shareholders. There are Equity team proxy voting policies in place to govern the circumstances where we vote against management.

The equity team continuously monitors for material changes, including ESG-related matters, which may impact our trend valuation assumptions for investee companies. Our ongoing dialogue with company management forms part of an assessment of company management's willingness and ability to address longer-term strategic issues. Where there is evidence to suggest that the material risks to sustainable returns have meaningfully changed, our valuation assumptions will be reviewed. Where the identified material risks sufficiently impact our conviction for our longer-term trend assumptions, in the context of valuation support, we may choose to exit from the investment. All investment professionals are responsible for the integration of ESG issues into the investment process, rather than outsourcing this responsibility to dedicated ESG or stewardship specialists.

LEA 07	Voluntary	Additional Assessed	PRI 1,2
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**LEA 07.1** Indicate whether insights gained from your organisation's engagements are shared with investment decision-makers.

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

**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
- Internal process that requires portfolio managers to re-balance holdings based on interaction and outcome levels
- Other; specify  
 The investment decision makers are the individuals responsible for engagements. Engagement is part of the equity investment process.
- None

**LEA 07.3** Indicate whether insights gained from your organisation's engagements are shared with your clients/beneficiaries.

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

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

We believe investment professionals are in the best position to evaluate all material risks to sustainable earnings of a company and issues that may have on long-term shareholder value. Engagement activities are integral to the investment process and therefore the responsibility of the equity team, rather than being delegated to ESG or stewardship specialists.

Records of all engagement activities and meetings with management/Investor Relations (IR) teams of companies are maintained centrally.

We encourage direct client dialogues, using case studies which demonstrate our process in action and ultimately, how we execute our fiduciary duty.

We have classified service providers to be ISS and MSCI ESG Research. We do not utilise either vendor in company engagements. We are active members of collaborative organizations including (amongst others) ACGA, ICGN, and AIGCC, where we provide direct input into their engagements with companies and regulatory bodies. From time to time, we may participate in collaborative engagement initiatives where we believe it to be in our client's best interests to do so.

LEA 08	Mandatory	Gateway	PRI 2
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**LEA 08.1** Indicate whether you track the number of your engagement activities.

Type of engagement	Tracking engagements
Individual/Internal staff engagements	<input checked="" type="checkbox"/> Yes, we track the number of our engagements in full <input type="checkbox"/> Yes, we partially track the number of our engagements <input type="checkbox"/> We do not track



<b>Collaborative engagements</b>	<input checked="" type="radio"/> Yes, we track the number of collaborative engagements in full <input type="radio"/> Yes, we partially track the number of our collaborative engagements <input type="radio"/> We do not track
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**LEA 08.2** Additional information. [Optional]

Engagement is an integral part of the fundamental due diligence conducted by investment decision makers in our investment process. It is therefore part of all one on one meetings held between the equity team and with investee company management. The equity team informally keep track of the one on one company management meetings, but this is not centrally maintained at this point in time.

We have classified service providers to be ISS and MSCI ESG Research. We do not utilise either vendor in company engagements. We are active members of collaborative organizations including (amongst others) ACGA, ICGN and AIGCC, where we provide direct input into their engagements with companies and regulatory bodies. From time to time, we may participate in collaborative engagement initiatives where we believe it to be in our client's best interests to do so.

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

**LEA 09.1** Indicate the proportion of companies in your listed equities portfolio with which your organisation engaged during the reporting year.

	We did not complete any engagements in the reporting year.	Number of companies engaged (avoid double counting, see explanatory notes)	Proportion of companies engaged with, out of total listed equities portfolio
Individual / Internal staff engagements	<input type="checkbox"/> We did not complete any engagements in the reporting year.	370	62.6
Collaborative engagements	<input type="checkbox"/> We did not complete any engagements in the reporting year.	6	1.01

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

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

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

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

**LEA 09.5** Additional information. [Optional]

The data provided represents the ongoing engagement activity that directly relates to material ESG issues for a company. We have not disclosed information relating to meetings with company management or engagement relating to matters that are not classified directly as ESG.

We aim to meet with the management or their representatives for all investment candidates as part of our fundamental research process, prior to making an investment decision. We engage with investee companies on an ongoing basis with a focus on materiality of issues that potentially impact the company's ability to deliver longer-term sustainable returns.

**LEA 10** Voluntary Additional Assessed PRI 2

LEA 10.1	Indicate which of the following your engagement involved.
<input checked="" type="checkbox"/>	Letters and emails to companies <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> In a minority of cases</li> <li><input type="checkbox"/> In a majority of cases</li> <li><input type="checkbox"/> In all cases</li> </ul>
<input checked="" type="checkbox"/>	Meetings and/or calls with board/senior management <ul style="list-style-type: none"> <li><input type="checkbox"/> In a minority of cases</li> <li><input checked="" type="checkbox"/> In a majority of cases</li> <li><input type="checkbox"/> In all cases</li> </ul>
<input checked="" type="checkbox"/>	Meetings and/or calls with the CSR, IR or other management <ul style="list-style-type: none"> <li><input type="checkbox"/> In a minority of cases</li> <li><input checked="" type="checkbox"/> In a majority of cases</li> <li><input type="checkbox"/> In all cases</li> </ul>
<input checked="" type="checkbox"/>	Visits to operations <ul style="list-style-type: none"> <li><input type="checkbox"/> In a minority of cases</li> <li><input checked="" type="checkbox"/> In a majority of cases</li> <li><input type="checkbox"/> In all cases</li> </ul>
<input checked="" type="checkbox"/>	Visits to supplier(s) in supplier(s) from the company's supply chain <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> In a minority of cases</li> <li><input type="checkbox"/> In a majority of cases</li> <li><input type="checkbox"/> In all cases</li> </ul>
<input checked="" type="checkbox"/>	Participation in roadshows <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> In a minority of cases</li> <li><input type="checkbox"/> In a majority of cases</li> <li><input type="checkbox"/> In all cases</li> </ul>
<input type="checkbox"/>	Other

LEA 10.2	Additional information. [Optional]
	We meet with company management as part of our fundamental research prior to making an investment decision. In terms of ongoing engagement, one or one meetings with company management is a priority, subject to availability.

LEA 11	Voluntary	Descriptive	PRI 2
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LEA 11.1	Provide examples of the engagements that your organisation or your service provider carried out during the reporting year.
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Add Example 1

ESG Topic	<input checked="" type="checkbox"/> Company leadership issues <input checked="" type="checkbox"/> Other governance
Conducted by	Individual / Internal
Objectives	The engagement was aimed at understanding better the corporate governance structure and practice the company, so that we are able to perform our fiduciary duties and decisions around proxy voting from a well-informed position.
Scope and Process	<p><b>Lixil</b></p> <p>In the January-May 2019 period held several conference calls with Lixil – interviews with ex-CEO Seto and Board Director Kawamoto. We also participated in Independent Director conference call presenting the findings of investigation in the appropriateness of proceedings related to Seto's dismissal and held calls with IR. These activities followed calls with Seto and then CEO Ushioda in December 2018. We also engaged IR in the need for the company to extricate itself from the influence of the founding family and nominate truly independent board members in future.</p> <p>In September, we continued engagement around need to restructure domestic window sash business in face of longer-term expected decline in housing starts. Also discussed the operation of the new board and whether size and different factions are impeding decision making. Company explained that discussions are collaborative, and experience has been good by now, but size of the board is indeed somewhat large.</p> <p>In December We discussed board size and efficiency, as well as need for decisive cost restructuring of the domestic business in face of possible future market size decline.</p>
Outcomes	Ongoing

Add Example 2

ESG Topic	<input checked="" type="checkbox"/> Other
Conducted by	Individual / Internal
Objectives	The engagement was aimed at increasing public disclosure.
Scope and Process	<b>Venture Corp</b> In April 2019, we met with the Head of IR and highlighted that the low level of public disclosure by the company was making it difficult for investors to understand the business. She acknowledged our concerns and mentioned that the company will look to improve disclosure, subject to client confidentiality.
Outcomes	Company committed to change

Add Example 3

ESG Topic	<input checked="" type="checkbox"/> General ESG <input checked="" type="checkbox"/> Shareholder rights
Conducted by	Individual / Internal
Objectives	The engagement was aimed at improving independent oversight and capital allocation, and capital raising practices consistent with shareholder interests, including minority shareholders.
Scope and Process	<b>Singapore Telecom</b> In March 2019, we highlighted our dis-satisfaction with dilution from allocation of rights issue shares to related party at what may be a turning point in Bharti Airtel.  Incumbent shareholders have ploughed capital into India and suffered and been diluted potentially at the inflexion point. We expressed that we would be pleased to see return on digital strategies and monetisation at some point. During the engagement, we noted no Environmental and Social issues. However, we noted a Governance issue, which is a surprising negative for this blue-chip company.  Accordingly, we directly highlighted our concern over the lack of Board independent support of minorities to the Chairman to relay the issue to the Board of Directors.
Outcomes	Increased understanding / information

Add Example 4

ESG Topic	<input checked="" type="checkbox"/> Company leadership issues <input checked="" type="checkbox"/> Shareholder rights <input checked="" type="checkbox"/> Other governance
Conducted by	Individual / Internal
Objectives	The engagement was aimed at signalling our disagreement with: <ul style="list-style-type: none"> <li>• Bundling of unrelated agenda items for voting</li> <li>• Proposed governance changes.</li> </ul>
Scope and Process	<b>Cogna</b> In October 2019, we conveyed the message against bundling unrelated topics in the same item to be voted.  We also shared our view against potentially problematic changes such as: <ol style="list-style-type: none"> <li>1. Creation of an unnecessary Council of Founders;</li> <li>2. Provision transfer of deliberative powers from Board to small committees.</li> </ol> Following the call with the company, and probably helped by pressure from other investors, the company has withdrawn plans to create this perpetual Founders' Committee.
Outcomes	Company changed practice

Add Example 5

ESG Topic	<input checked="" type="checkbox"/> Human rights <input checked="" type="checkbox"/> General ESG
Conducted by	Individual / Internal
Objectives	The engagement was aimed at addressing human rights and health and safety controversy, as well as understanding how the controversy was being remediated.

Scope and Process	<p><b>China Railway Group</b></p> <p>China Railway Group ESG score is below our fund average and its Controversy category is 4 placed by Sustainalytics.</p> <p>China Railway Group and its subsidiary, China Railway Seventh Group (CRSG), face potential legal risks arising from the long-term impacts caused to the communities in Uganda, for which the contract workers are blamed for.</p> <p>In January 2016, CRSG faced public criticism and outcry over its Kamwenge-Fort Portal Road project following the nearby communities' allegations of severe sexual misconduct by contract workers. These include sexual harassment of female colleagues and sexual relations with minor girls from the communities.</p> <p>We have communicated our concerns with the company. They claimed that it is just a one-off issue, adding that this sexual misconduct is sourced by China Railway Group and their local sub-contractor in Uganda. China Railway Group, upon realisation, had sent the criminal to local police. After this incident, China Railway Group has reinforced the risk-management of sub-contractors, employee's safety protection, training program of overseas employee. Additionally, China Railway Group has created a list to reject any partnership with third-parties which have criminal issues.</p>
Outcomes	Company changed practice

Add Example 6

ESG Topic	<input checked="" type="checkbox"/> Company leadership issues <input checked="" type="checkbox"/> Other governance
Conducted by	Individual / Internal
Objectives	<p>The engagement was aimed at:</p> <ul style="list-style-type: none"> <li>• Encouraging restructuring that would contribute to improving sustainable trend returns;</li> <li>• Signalling our proxy voting intentions.</li> </ul>
Scope and Process	<p><b>Hyundai Motor</b></p> <p>In February 2019, we discussed the following issues: expansion strategy in India; launches of new model; and Electric Vehicle R&amp;D capex impact on margins and selling price discount incentives.</p> <p>The new CEO, who is the son of the founder, will re-visit Group restructuring in the future after a very unsatisfactory past scenario was subsequently voted down.</p> <p>We actively participated together with activist investor Elliott Management to disagree and vote down prior re-structuring items and highlighted that we will do so again in future unless proposals are equitable to all shareholders.</p>
Outcomes	Ongoing

Add Example 7

ESG Topic	<input checked="" type="checkbox"/> Company leadership issues <input checked="" type="checkbox"/> Other governance
Conducted by	Individual / Internal
Objectives	The engagement was aimed at assessing how the company was addressing systemic failure of compliance and governance of business
Scope and Process	<p><b>Leopalace21</b></p> <p>We conducted face-to-face interviews and continued with more than ten phone conversations with Director Miyao as events unfolded. We:</p> <ul style="list-style-type: none"> <li>• Discussed systemic building construction faults from past 20 years announced February 2019. Prior to this, management had insisted all material faults had been disclosed during 2018. We expressed this was massive systemic failure of compliance and governance across business at all levels;</li> <li>• Assessed risks of short-term cash flow and solvency problems; timing and implementation of repairs; sufficiency of provisions given falling occupancy ratios; potential need for asset sales and equity raising;</li> <li>• Expressed that major changes in corporate culture are needed and discussed implementation and associated costs. Discussed likely culpability of senior management and that resignations were necessary but not sufficient to restore confidence in business;</li> <li>• Monitored progress of asset sales to boost cash reserves needed for repairs; 8 board members including president and vice president to resign at AGM and the new president Miyao plans a large new compliance function as recommended by the third-party independent committee.</li> <li>• Assessed the likely trend cost of new compliance function and plans to change its culture;</li> <li>• Expressed that it was inappropriate that president and vice president remain as consultants to business.</li> </ul>
Outcomes	Ongoing

Add Example 8

ESG Topic	<input checked="" type="checkbox"/> Climate Change <input checked="" type="checkbox"/> Pollution <input checked="" type="checkbox"/> Other governance
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Conducted by	Individual / Internal
Objectives	The engagement was aimed at understanding the company's long-term strategy in terms of alignment to transition to a low carbon economy and sustainability of shareholder returns
Scope and Process	<p><b>Thai Oil</b></p> <p>We engaged on the following issues:</p> <ul style="list-style-type: none"> <li>• IMO 2020 implications on usage of high sulphur fuel oil HSFO vs LSFO Capex planning for expansion and upgrading facilities to improve complexity and thereafter producing less HSFO to participate better in IMO 2020;</li> <li>• Dividend sustainability given capex outlook.</li> </ul>
Outcomes	Increased understanding / information

Add Example 9

ESG Topic	<input checked="" type="checkbox"/> Climate Change <input checked="" type="checkbox"/> Pollution <input checked="" type="checkbox"/> Other governance
Conducted by	
Objectives	The engagement was aimed at understanding long-term strategy in terms of alignment to transition to a low carbon economy and sustainability of shareholder returns.
Scope and Process	<p><b>CNOOC</b></p> <p>We engaged on the following issues:</p> <ul style="list-style-type: none"> <li>• Planning to use power from the national grid and stop offshore power generation to reduce carbon emissions;</li> <li>• Building underwater cables to build SMART oilfields to help reduce the risk of accidents and to cut environmentally unfriendly water use in processes;</li> <li>• Using new tech at thermal boiler heated with re-cycled flare gas / electricity to recover heavy oil;</li> <li>• Reviewing capex expansion in 6 projects in a "going for growth" strategy.</li> </ul>
Outcomes	Ongoing

Add Example 10

ESG Topic	<input checked="" type="checkbox"/> Climate Change <input checked="" type="checkbox"/> Pollution <input checked="" type="checkbox"/> Other governance
Conducted by	Individual / Internal
Objectives	The engagement was aimed at understanding long-term strategy in terms of alignment to transition to a low carbon economy and sustainability of shareholder returns.
Scope and Process	<p><b>Chubu Electric</b></p> <p>We discussed coal generation and CO2 problem with the company. The company shared that it is working to transition all its coal generation to USC technology whilst closing old coal generation plants. It is also increasing its efforts in offshore wind power generation development. The company is also working on developing energy savings management solutions for corporate clients and households.</p> <p>In terms of Governance, we continued to iterate the need for the company to adhere to principle of fairness of split in earnings and ROIC in JV with Tepco.</p> <p>We have subsequently sold the position after good relative share price performance.</p>
Outcomes	Increased understanding / information

LEA 12	Mandatory	Descriptive	PRI 2
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LEA 12.1 Indicate how you typically make your (proxy) voting decisions.

Approach
<input type="radio"/> We use our own research or voting team and make voting decisions without the use of service providers. <input checked="" type="radio"/> We hire service providers who make voting recommendations and/or provide research that we use to guide our voting decisions.
Based on
<input type="radio"/> The service-provider voting policy we sign off on <input checked="" type="radio"/> Our own voting policy <input type="radio"/> Our clients' requests or policies <input type="radio"/> Other (explain)

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

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

**Voting process**

Voting decisions are taken by designated Equity team members and relayed to Corporate Actions team for execution.

It must be ensured that there are no conflicts of interest in the exercise of votes. Any portfolio manager with knowledge of a personal conflict of interest shall disclose that conflict to the Chief Risk Officer and may be required to abstain him or herself from the proxy voting process.

In respect of voting rights relating to investment of a collective investment scheme / unit trust, where the portfolio manager could face conflicts of interest, the votes to be exercised in consultation with the trustee, where applicable.

On voting analysis, we engage an independent third-party service provider to provide research and recommendations in connection with the voting of proxies. Whilst the Equity team retains the final authority and fiduciary responsibility for the voting of proxies the proxy advisor shall deliver to the Equity team research and vote recommendations electronically for analysis.

Written approval by the CIO or the Equity Team Leader is required where the designated Equity team member is either voting against management or abstaining, and where the item has not been described within our predetermined policy.

Records of all votes, the proxy advisor recommendations and where appropriate written approvals are maintained centrally. As part of the audit / compliance monitoring process, details may be requested from the portfolio manager covering the stock from time to time.

Voting will be governed by the requirements under the investment management agreement, prospectus and local laws.

Proxy voting results are made publicly available.

**Proxy Voting Policy**

We follow a principles-based approach. All votes we exercise are considered in the context of the principles as set out in our proxy voting policy.

An active and informed voting policy is an integral part of our investment philosophy. Voting should never be divorced from the underlying investment activity. By exercising our votes, we seek both to add value and to protect our interests as shareholders. We consider the issues, meet the management if necessary and vote accordingly. Where possible, we would seek to discuss any contentious resolutions with investee companies before casting our votes in order to ensure that our objectives are understood, and our votes will be cast in the best interests of our investors/clients.

We may decide to not vote proxies or abstain from voting where the costs are prohibitive and would not serve the shareholders' interest.

It is not our policy to accept client standing instructions.

We always apply our judgment and decide how to vote each resolution on its merits in the context of principles of our proxy policy. These include, but are not limited to:

- In the case of poor business performance, we do not apply any mechanical definition for the purpose of our exercise of proxy votes. Poor business performance must always be considered with a detailed understanding of the company in question within the context of our investment rationale for owning the company's shares;
- Where applicable, we will vote against management that have engaged in or facilitated anti-social acts where responsibility can be reasonably determined or assumed. Anti-social acts are defined as a violation of law or an act that violates public order and causes economic loss;
- Where applicable, all motions involving Retirement Bonuses for Directors and Internal Auditors will be voted against. We in principle do not approve of retirement bonuses for Directors since this is a disincentive for independent oversight by Directors for shareholders. For Internal Auditors there is an inherent conflict of interest created by paying auditors bonuses;
- Anti-takeover poison pills will also be automatically voted against;
- Increases in Allowable Capital will be dealt with on a case by case basis;
- Issuance of equity will be assessed in terms of justification of proposed dilution, including use of capital in relation to cost of equity and impact of returns;
- Pre-emptive rights (including certain warrants) variable of undefined dilution, or share placements that cannot be clearly shown to be in the interest of shareholders will be voted against;
- Agenda items that offer broad scope of interpretation, including "Other Matters" or "Any Other Business" will be voted against.

Written pre-clearance from either the Equity CIO or Equity Team Leader will be required when voting decisions made by the team are not in alignment with internal ESI Equity policy.

**Take-over bids**

Our general policy is to support incumbent management in good standing. We reserve the right to support hostile bids when the management have either consistently failed to respond to the reasonable expectations of shareholders or where, in our judgment, the level of a bid fully recognizes the future prospects of the Company.

**Compensation plans**

It is clearly in the interest of shareholders that boards should have the ability to attract and retain the highest quality of personnel. Remuneration levels in different companies will be a market-based judgment, taking business size and complexity into account and should reflect relative performance.

**Capital raising**

Capital used by companies is derived from equity, debt and other creditors. The rights of lenders and other creditors are precisely defined in law. This contrasts with the economic interest of shareholders providing the equity capital. Protection of the shareholders' position relies largely upon ownership, with the right to vote at company meetings and thereby determine company articles and board membership.

We do not support pre-emption on the basis that in principle, one party is favoured over another party. It is therefore incumbent upon boards to demonstrate clearly, on a case-by-case basis, why pre-emption is in the best interests of the existing owners/clients/investors.

**LEA 12.3** Additional information.[Optional]

A patient timeframe can improve the probability of outcomes. We believe our focused, valuation-driven approach is clearly aligned with stewardship activities, including ongoing company engagement, for shareholder value realisation over the longer-term. Our approach is aligned with promoting increased long-term value creation and sustainable business practices by companies. The approach focuses principally on long-term factors that determine

companies' earnings, rather than on the short-term factors that may predominate in determining share prices. We place a high level of importance on an ongoing dialogue with investee companies primarily based on what we believe will maximise shareholder value as long-term investors.

By maintaining a continuing dialogue with company management, we signal our intentions by voting on resolutions at general meetings. As a general policy we are supportive of the management of the companies in which we invest. However, when companies consistently fail to achieve our reasonable expectations, we will actively promote changes. These changes might range from the formulation of a new strategy to the appointment of new management or non-executive directors.

LEA 14	Voluntary	Additional Assessed	PRI 2
LEA 14.1	Does your organisation have a securities lending programme?		
	<input type="radio"/> Yes <input checked="" type="radio"/> No		
LEA 14.2	Describe why your organisation does not lend securities.		
	Our clients have securities lending programs in place.		

LEA 15	Mandatory	Descriptive	PRI 2
LEA 15.1	Indicate the proportion of votes participated in within the reporting year in which where you or the service providers acting on your behalf raised concerns with companies ahead of voting.		
	<input checked="" type="radio"/> 100% <input type="radio"/> 99-75% <input type="radio"/> 74-50% <input type="radio"/> 49-25% <input type="radio"/> 24-1% <input type="radio"/> Neither we nor our service provider(s) raise concerns with companies ahead of voting		
LEA 15.3	Additional information. [Optional]		
	<p>We believe that voting should never be divorced from the underlying investment activity.</p> <p>By exercising our votes we seek both to add value and to protect our interests as shareholders. We consider the issues, meet the management if necessary and vote accordingly. Where possible, we would seek to discuss any contentious resolutions with investee companies before casting our votes in order to ensure that our objectives are understood and our votes will be cast in the best interests of our investors/clients.</p>		

LEA 16	Mandatory	Core Assessed	PRI 2
LEA 16.1	Indicate the proportion of votes where you, and/or the service provider(s) acting on your behalf, communicated the rationale to companies for abstaining or voting against management recommendations. Indicate this as a percentage out of all eligible votes.		
	<input type="radio"/> 100% <input type="radio"/> 99-75% <input type="radio"/> 74-50% <input type="radio"/> 49-25% <input checked="" type="radio"/> 24-1% <input type="radio"/> We do not communicate the rationale to companies <input type="radio"/> Not applicable because we and/or our service providers did not abstain or vote against management recommendations		
LEA 16.2	Indicate the reasons why your organisation would communicate to companies, the rationale for abstaining or voting against management recommendations.		
	<input type="checkbox"/> Vote(s) concern selected markets <input type="checkbox"/> Vote(s) concern selected sectors <input checked="" type="checkbox"/> Vote(s) concern certain ESG issues <input checked="" type="checkbox"/> Vote(s) concern companies exposed to controversy on specific ESG issues <input checked="" type="checkbox"/> Vote(s) concern significant shareholdings <input checked="" type="checkbox"/> Client request <input checked="" type="checkbox"/> Other		
	Explain		
	When companies consistently fail to achieve our reasonable expectations, we will actively promote changes, which can be reflected in our proxy votes and may be signalled via direct company dialogue.		
LEA 16.3	In cases where your organisation does communicate the rationale for abstaining or voting against management recommendations, indicate whether this rationale is made public.		
	<input type="radio"/> Yes <input checked="" type="radio"/> No		
LEA 16.4	Additional information. [Optional]		
	<p>We do currently have open dialogues with company management, where we signal our voting intentions and discuss the rationale with company management.</p> <p>We are in the process of operationalising the communication of rationales for voting against management recommendations. The response to Q) 16.1 is an</p>		

estimate that is representative of the feedback we have given to company management.

LEA 17	Mandatory	Core Assessed	PRI 2		
LEA 17.1	For listed equities in which you or your service provider have the mandate to issue (proxy) voting instructions, indicate the percentage of votes cast during the reporting year.				
<input checked="" type="checkbox"/> We do track or collect this information					
	<table border="1"> <thead> <tr> <th>Votes cast (to the nearest 1%)</th> </tr> </thead> <tbody> <tr> <td>99%</td> </tr> </tbody> </table>			Votes cast (to the nearest 1%)	99%
Votes cast (to the nearest 1%)					
99%					
	<table border="1"> <thead> <tr> <th>Specify the basis on which this percentage is calculated</th> </tr> </thead> <tbody> <tr> <td> <input type="checkbox"/> Of the total number of ballot items on which you could have issued instructions  <input checked="" type="checkbox"/> Of the total number of company meetings at which you could have voted  <input type="checkbox"/> Of the total value of your listed equity holdings on which you could have voted                 </td> </tr> </tbody> </table>			Specify the basis on which this percentage is calculated	<input type="checkbox"/> Of the total number of ballot items on which you could have issued instructions <input checked="" type="checkbox"/> Of the total number of company meetings at which you could have voted <input type="checkbox"/> Of the total value of your listed equity holdings on which you could have voted
Specify the basis on which this percentage is calculated					
<input type="checkbox"/> Of the total number of ballot items on which you could have issued instructions <input checked="" type="checkbox"/> Of the total number of company meetings at which you could have voted <input type="checkbox"/> Of the total value of your listed equity holdings on which you could have voted					
<input type="checkbox"/> We do not track or collect this information					
LEA 17.2	Explain your reason(s) for not voting on certain holdings				
<input type="checkbox"/> Shares were blocked <input type="checkbox"/> Notice, ballots or materials not received on time <input type="checkbox"/> Missed deadline <input type="checkbox"/> Geographical restrictions (non-home market) <input checked="" type="checkbox"/> Cost <input type="checkbox"/> Conflicts of interest <input type="checkbox"/> Holdings deemed too small <input type="checkbox"/> Administrative impediments (e.g., power of attorney requirements, ineligibility due to participation in share placement) <input type="checkbox"/> Client request <input type="checkbox"/> Other (explain)					
LEA 17.3	Additional information. [Optional]				
We may decide to not vote proxies or abstain from voting where the costs are prohibitive and would not serve the shareholders' interest.					

LEA 18	Voluntary	Additional Assessed	PRI 2								
LEA 18.1	Indicate whether you track the voting instructions that you or your service provider on your behalf have issued.										
<input checked="" type="checkbox"/> 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:										
<table border="1"> <thead> <tr> <th>Voting instructions</th> <th>Breakdown as percentage of votes cast</th> </tr> </thead> <tbody> <tr> <td>For (supporting) management recommendations</td> <td>88.6%</td> </tr> <tr> <td>Against (opposing) management recommendations</td> <td>10.3%</td> </tr> <tr> <td>Abstentions</td> <td>1.1%</td> </tr> </tbody> </table>				Voting instructions	Breakdown as percentage of votes cast	For (supporting) management recommendations	88.6%	Against (opposing) management recommendations	10.3%	Abstentions	1.1%
Voting instructions	Breakdown as percentage of votes cast										
For (supporting) management recommendations	88.6%										
Against (opposing) management recommendations	10.3%										
Abstentions	1.1%										
<input type="checkbox"/> 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.										
100											
LEA 18.4	Additional information. [Optional]										
<p>We believe that voting should never be divorced from the underlying investment activity.</p> <p>By exercising our votes, we seek both to add value and to protect our interests as shareholders. We consider the issues, meet the management if necessary and vote accordingly. Where possible, we would seek to discuss any contentious resolutions with investee companies before casting our votes in order to ensure that our objectives are understood and our votes will be cast in the best interests of our investors/clients.</p>											

LEA 19	Mandatory	Core Assessed	PRI 2
LEA 19.1	Indicate whether your organisation has a formal escalation strategy following unsuccessful voting.		
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
LEA 19.2	Indicate the escalation strategies used at your organisation following abstentions and/or votes against management.		
<input checked="" type="checkbox"/> Contacting the company's board <input checked="" type="checkbox"/> Contacting the company's senior management <input checked="" type="checkbox"/> Issuing a public statement explaining the rationale <input checked="" type="checkbox"/> Initiating individual/collaborative engagement			



- Directing service providers to engage
- Reducing exposure (holdings) / divestment
- Other

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

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

ESG Topic	<input checked="" type="checkbox"/> Other governance
Conducted by	Individual/Internal
Objectives	Ensure good governance with a truly independent audit process.
Scope and Process	<p><b>Company:</b> MMC Norilsk Nickel PJSC  <b>Proposal:</b> Ratify IFRS Auditor  <b>ISS Recommend:</b> Against  <b>Eastspring Vote:</b> Against</p> <p>Ratification of KPMG as the company's audit firm is warranted given that the non-audit fees are 55.2 percent of the total fees received by the audit firm during the fiscal year, raising substantial doubts over the independence of the auditor. This comes even as Management recommended For.</p>
Outcomes	Ongoing

Add Example 2

ESG Topic	<input checked="" type="checkbox"/> Company leadership issues <input checked="" type="checkbox"/> Other governance
Conducted by	Individual/Internal
Objectives	Effect change in senior management after clear governance failures.
Scope and Process	<p><b>Company:</b> Lixil Group  <b>Proposal:</b> Elect Director Kawahara, Haruo  <b>ISS Recommend:</b> For  <b>Eastspring Vote:</b> Against</p> <p>We have closely engaged with both the company and the shareholder proposed candidates. Lixil represents a clear example of governance failure, including failure in the nomination process and failure of some members of the nomination committee to fulfil their duty. This caused past failures and compromised the nomination process for current company candidates. Prior to the governance failures culminating in the removal of Seto Kinya, we were supportive of the strategy Seto Kinya had put in place. We see the implementation of this strategy as the best path to realising shareholder value and with appropriate oversight, as the most favourable outcome. We have taken into consideration factors including, but not limited to:</p> <ul style="list-style-type: none"> <li>• Rapid implementation of a viable strategy for sustainable improvement in company performance;</li> <li>• Our research, presentations and discussions provided by both the company candidates and the shareholder candidates;</li> <li>• Suitability of each candidate, both individually and in terms of their ability to function collectively in the best interests of the company and its shareholders;</li> <li>• Views of senior management and their ability to work collectively with directors to improve business performance.</li> </ul> <p>This comes as Management voted For.</p>
Outcomes	Ongoing

Add Example 3

ESG Topic	<input checked="" type="checkbox"/> Shareholder rights
Conducted by	Individual/Internal
Objectives	Signal our expectations for capital allocation that supports shareholder value.

Scope and Process	<p><b>Company:</b> Hyundai Motor Co. Ltd.  <b>Shareholder Proposal:</b> Approve Appropriation of Income - KRW21,967  <b>ISS Recommend:</b> Against  <b>Eastspring Vote:</b> For</p> <p>HMC balance sheet has been sub-optimal for a few years now with a very high cash balance (60% of market cap). This in the past has led to poor M&amp;A and capex decision making, thereby leading to low ROE outcomes. This included buying land and investing in group unrelated businesses to further the family control in those companies.</p> <p>Management is now further raising its capex and R&amp;D plan over the next 5 years, representing a 55% increase from the last five-year history (KRW29tr).</p> <p>This is being done without sharing any IRR hurdles and include a large M&amp;A portion. Given the historical track-record and low IRR hurdles used, it would be more appropriate for the company to pay out part of its large cash balance.</p> <p>ISS is not in favor of a higher DPS. ISS takes management guidance on capex and R&amp;D (KRW45tr) and hence thinks current cash is not enough to meet the shareholder proposal. This is not a holistic view and will allow current management to continue with its poor M&amp;A behavior.</p> <p>This comes as Management recommended Against.</p>
Outcomes	Ongoing

Add Example 4

ESG Topic	<input checked="" type="checkbox"/> Company leadership issues <input checked="" type="checkbox"/> Diversity
Conducted by	Individual/Internal
Objectives	Support Board-level diversity.
Scope and Process	<p><b>Company:</b> Hyundai Motor Co Ltd  <b>Shareholder Proposal:</b> Elect Margaret S. Bilson as Outside Director  <b>ISS Recommend:</b> Against  <b>Eastspring Vote:</b> For</p> <p>SH resolution: Margaret would represent the only woman on the Board, which is crucial in my view to help diversity, inclusion and hence aid better decision making.</p> <p>ISS says her aviation experience is not relevant and recommends voting against her. We would disagree and think the future in mobility sharing and light-weight construction to meet emission and carbon norms in the automobile industry takes it closer to aviation. This makes her a valuable asset, and contribute to the Hyundai auto's journey in ride sharing. The argument is the same for having Margaret on the audit committee.</p> <p>This comes even as Management recommended Against.</p>
Outcomes	Ongoing

Add Example 5

ESG Topic	<input checked="" type="checkbox"/> Executive Remuneration
Conducted by	Individual/Internal
Objectives	Align management behaviour with shareholder interests.
Scope and Process	<p><b>Company:</b> Zhejiang Dahua Technology Co. Ltd.  <b>Proposal:</b> Approve Draft and Summary on Performance Share Incentive Plan (Revised)  <b>ISS Recommend:</b> Against  <b>Eastspring Vote:</b> For</p> <p>This incentive scheme is to align management performance target with shareholders' interest. This comes as Management recommended For.</p>
Outcomes	Company committed to change

Add Example 6

ESG Topic	<input checked="" type="checkbox"/> Executive Remuneration
Conducted by	Individual/Internal
Objectives	Align management performance KPIs with shareholder interests.

Scope and Process	<p><b>Company:</b> Wesfarmers  <b>Proposal:</b> Approve Remuneration Report  <b>ISS Recommend:</b> Against  <b>Eastspring Vote:</b> Against</p> <p>A vote AGAINST this resolution is warranted due to concerns regarding the company's remuneration structure:</p> <ul style="list-style-type: none"> <li>Quantum of the combined KEEPP award for the CEO of \$6.5m is very high, with poor disclosure of the individual performance targets and outcomes to justify what the bonus represents and how it meets/exceeds pre-determined targets;</li> <li>Quantum of the KEEPP award based on non-financial measures (\$3m) is excessive, considering that the nature of some of disclosed measures appear to be core day-job responsibilities, for which substantial fixed remuneration is paid;</li> <li>Two non-financial performance measures for FY19 performance share grant (40% of grant) lack adequately disclosed targets, such as: portfolio management and investment outcomes and strategic measures;</li> <li>'Double-dipping' executive rewards: portfolio management appears to be rewarded twice, as part of individual objectives and performance shares;</li> <li>Dividends are payable on performance shares that ultimately vest, increasing the value of the award, however, given that there is no present entitlement to dividends or share during the performance period and prior to the board's determination of vesting, then this aspect has often not receiver shareholders' support in this market;</li> <li>High fees paid to the Chairman.</li> </ul>
Outcomes	Ongoing

Add Example 7

ESG Topic	<input checked="" type="checkbox"/> Climate Change <input checked="" type="checkbox"/> Sustainability reporting
Conducted by	Individual/Internal
Objectives	Enhance disclosure and transparency around coal exposure and carbon transition pathways.
Scope and Process	<p><b>Company:</b> Standard Bank Group Ltd  <b>Shareholder Proposal:</b> Adopt and Publicly Disclose a Policy on Lending to Coal-fired Power Projects and Coal Mining Operations  <b>ISS Recommend:</b> For  <b>Eastspring Vote:</b> For</p> <p>A vote FOR this proposal is warranted: Whilst the company has now publicly disclosed a policy on lending to coal-fired power projects, there is no apparent disclosure of its policy on the bank's wider lending to coal mining operations. This information could be of benefit to shareholders.</p> <p>This comes even as the Management recommended Against.</p>
Outcomes	Company committed to change

Add Example 8

ESG Topic	<input checked="" type="checkbox"/> Company leadership issues
Conducted by	Individual/Internal
Objectives	Signal company management around their failure to consistently deliver to expectations.
Scope and Process	<p><b>Company:</b> Credit Saison  <b>Proposal:</b> Elect Director Rinno, Hiroshi  <b>ISS Recommend:</b> For  <b>Eastspring Vote:</b> Against</p> <p>We intend to vote against the Chairman/CEO of Credit Saison due to his responsibility for extended poor performance, entrenchment, and the impediment he represents to better governance. This comes even as Management recommended For.</p>
Outcomes	Ongoing

Add Example 9

ESG Topic	<input checked="" type="checkbox"/> Climate Change
Conducted by	Individual/Internal
Objectives	Enhance disclosure around carbon transition pathway.

Scope and Process	<p><b>Company:</b> AGL Energy Limited  <b>Shareholder Proposal:</b> Approve Transition Planning Disclosure</p> <p><b>ISS Recommended:</b> For  <b>Eastspring Vote:</b> For</p> <p>A vote FOR this proposal is warranted. Additional information on the company's GHG reduction goals would allow shareholders to better assess the company's management of these emissions and related risks.</p> <p>This comes even as Management recommended Against.</p>
Outcomes	Ongoing

Add Example 10

ESG Topic	<input checked="" type="checkbox"/> Climate Change
Conducted by	Individual/Internal
Objectives	Enhance disclosure around carbon transition pathway.
Scope and Process	<p><b>Company:</b> FirstRand Limited  <b>Shareholder Proposal:</b> Approve Report on Company's Assessment of its Exposure to Climate-Related Risks by no later than October 2020</p> <p><b>ISS Recommend:</b> For  <b>Eastspring Vote:</b> For</p> <p>A vote FOR this item is considered warranted due to the following:</p> <ul style="list-style-type: none"> <li>• Potential implementation of this item appears in line with and would not be expected to hinder the Company's own initiative already underway to improve its climate-related risk framework beyond October 2020;</li> <li>• Disclosure requested by the resolution is considered reasonable and is likely to be useful for shareholders;</li> <li>• Whilst the company has provided some public commitments regarding its climate-related reporting in response to this resolution, its proposed timeframe of three to five years for enhanced reporting is considered slow, especially given the Company's own commitment and initiatives to implement the recommendations of the TCFD to which the proposal requirements are also aligned.</li> </ul> <p>This comes even as Management recommended Against.</p>
Outcomes	Company committed to change

LEA Checks

Checks

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

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

SSA	Screening alone	0
	Thematic alone	0
	Integration alone	99
	Screening + integration strategies	1
	Thematic + integration strategies	0
	Screening + thematic strategies	0
	All three strategies combined	0
	No incorporation strategies applied	0
Corporate (financial)	Screening alone	0
	Thematic alone	0
	Integration alone	99
	Screening + integration strategies	1
	Thematic + integration strategies	0
	Screening + thematic strategies	0
	All three strategies combined	0
	No incorporation strategies applied	0
Corporate (non-financial)	Screening alone	0
	Thematic alone	0
	Integration alone	99
	Screening + integration strategies	1
	Thematic + integration strategies	0
	Screening + thematic strategies	0
	All three strategies combined	0
	No incorporation strategies applied	0

FI 01.2	Describe your reasons for choosing a particular ESG incorporation strategy and how combinations of strategies are used.
<p>The integration of ESG analysis into our investment process at Eastspring Investments is an ongoing and long term process. Assessment and monitoring of ESG factors are an integral part of our bottom-up credit research process. ESG issues, where material, are incorporated in our fundamental analysis of individual companies to assess their impact on an issuer's financial performance, its risk of default, and the valuation of the bonds it issues. Additional ESG screening criteria is applied to a Sustainable Bond fund that we manage.</p>	

FI 14	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 2
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FI 14.1	Indicate the proportion of your fixed income assets on which you engage. Please exclude any engagements carried out solely in your capacity as a shareholder.
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Category	Proportion of assets			
Corporate (financial)	<input type="radio"/> >50% <input checked="" type="radio"/> 26-50% <input type="radio"/> 5-25% <input type="radio"/> More than 0%, less than 5%			
	<table border="1" style="width: 100%; background-color: #0070C0; color: white;"> <tr> <td style="background-color: #0070C0; color: white;">FI 14.2</td> <td style="background-color: #0070C0; color: white;">Indicate your motivations for conducting engagement (Corporate, Financial fixed income assets)</td> </tr> <tr> <td colspan="2"> <input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management  <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure  <input type="checkbox"/> To influence issuer practice (or identify the need to influence) on ESG issue                 </td> </tr> </table>	FI 14.2	Indicate your motivations for conducting engagement (Corporate, Financial fixed income assets)	<input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> To influence issuer practice (or identify the need to influence) on ESG issue
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<input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> To influence issuer practice (or identify the need to influence) on ESG issue				
Corporate (non-financial)	<input type="radio"/> >50% <input checked="" type="radio"/> 26-50% <input type="radio"/> 5-25% <input type="radio"/> More than 0%, less than 5%			
	<table border="1" style="width: 100%; background-color: #0070C0; color: white;"> <tr> <td style="background-color: #0070C0; color: white;">FI 14.2</td> <td style="background-color: #0070C0; color: white;">Indicate your motivations for conducting engagement (Corporate, non-financial fixed income assets)</td> </tr> <tr> <td colspan="2"> <input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management  <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure  <input type="checkbox"/> To influence issuer practice (or identify the need to influence) on ESG issue                 </td> </tr> </table>	FI 14.2	Indicate your motivations for conducting engagement (Corporate, non-financial fixed income assets)	<input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> To influence issuer practice (or identify the need to influence) on ESG issue
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FI 14.3	Additional information.[OPTIONAL]
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As a debt holder, we are not owners of the company we invest in. We are not able to vote on key company matters and our influence on the company is also not as strong as equity holders due to our position in the capital structure. Nonetheless, we seek to obtain a better understanding on how the company is managing, or plan to manage, material ESG risks through our interaction with the company. This may take place during investor meetings and conference calls with the company's management in the run-up of a bond issuance or during earnings calls.

FI 15	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1,2
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FI 15.1	Indicate how you typically engage with issuers as a fixed income investor, or as both a fixed income and listed equity investor. (Please do not include engagements where you are both a bondholder and shareholder but engage as a listed equity investor only.)
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Type of engagement	Corporate (financial)	Corporate (non-financial)
Individual/Internal staff engagements	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Collaborative engagements	<input type="checkbox"/>	<input type="checkbox"/>
Service provider engagements	<input type="checkbox"/>	<input type="checkbox"/>

FI 15.2	Indicate how your organisation prioritises engagements with issuers.
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	Corporate (financial)	Corporate (non-financial)
Size of holdings	<input type="checkbox"/>	<input type="checkbox"/>
Credit quality of the issuer	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Duration of holdings	<input type="checkbox"/>	<input type="checkbox"/>
Quality of transparency on ESG	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Specific markets and/or sectors	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Specific ESG themes	<input type="checkbox"/>	<input type="checkbox"/>
Issuers in the lowest ranks of ESG benchmarks	<input type="checkbox"/>	<input type="checkbox"/>
Issuers in the highest ranks of ESG benchmarks	<input type="checkbox"/>	<input type="checkbox"/>
Specific issues considered priorities for the investor based on input from clients and beneficiaries	<input type="checkbox"/>	<input type="checkbox"/>

Other	<input type="checkbox"/>	<input type="checkbox"/>
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**FI 15.3** Indicate when your organisation conducts engagements with issuers.

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

**FI 15.4** Indicate what your organisation conducts engagements with issuers on.

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

**FI 15.5** Indicate how your organisation ensures that information and insights collected through engagement can feed into the investment decision-making process.

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

**FI 15.6** Additional information.[OPTIONAL]

As a debt holder, we are not owners of the company we invest in. We are not able to vote on key company matters and our influence on the company is also not as strong as equity holders due to our position in the capital structure. Nonetheless, we seek to obtain a better understanding on how the company is managing, or plan to manage, relevant ESG risks through our interaction with the company. This may take place during investor meetings and conference calls with the company's management in the run-up of a bond issuance or during earnings calls.

These risks and the company's response to these risks are documented in the research reports which are accessible by the Fixed Income team. We also have an excel file that records the engagements and this file can be shared with interested parties.

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

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

Yes

**FI 16.2** Please attach or provide a URL to your fixed income engagement policy document. [Optional]

<https://www.eastspring.com/about-us/responsible-investment>  
Files: link

No

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

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

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

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

Our system is capable of reporting ESG profile of portfolios vs benchmark based on MSCI ESG scores as well as carbon intensity data and listing the top contributors to ESG risk. For the Sustainable Bond Fund, we will be providing clients on a regular basis with a report on the ESG profile of the portfolio using ESG data in our system including MSCI ESG scores.

**FI 18** Voluntary Descriptive PRI 1,2

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

Example 1

Corporate (non-financial)	
	ESG issue and explanation
<p><b>Korea Auto company</b> – tightening emission standards and product quality issues</p> <p>With governments introducing tougher emissions standards, auto companies have been compelled to invest in technology and new models, such as electric vehicles, which require massive capital investments. At the same time, conventional vehicles have faced weaker sales, partly because of the changes in emission standards and the softer economic environment. Long-standing product quality issues have also been plaguing the automaker. All these issues combined have led to its profit declining over the past several years.</p>	
Integration	
	Impact on investment decision or performance
<p>Our decision to trim our exposure was due to concerns about its operating performance and financial profile as the regulatory environment in Asia's auto sector intensified</p>	

Example 2

Corporate (non-financial)	
	ESG issue and explanation
<p><b>China property developer</b> – product quality issues</p> <p>Our growing unease with this Chinese developer was also partly due to product quality concerns, following a series of fatal incidents at its projects under construction in late 2018, which hurt its bond price as questions were raised over the sustainability of its ultra-rapid asset turnover model. The company consequently stepped up control over its contractors and increased the frequency of quality inspections. A safety committee, headed by the chairman, also invited local government officials to inspect projects. Willingness to address these issues subsequently led us to remove the negative outlook on the issuer.</p>	
Integration	
	Impact on investment decision or performance
<p>We continue to <b>HOLD</b> this bond.</p>	

Example 3

Corporate (non-financial)	
	ESG issue and explanation
<p><b>Indonesian Coal mining company</b> – Corporate governance concerns</p> <p>Amidst a sharp downturn in the coal industry during the global financial crisis, the company aggressively took on more debt after acquiring several businesses but subsequently had to restructure most of the debt as it faced financial difficulties. Several of its related companies owned by the same family also faced financial difficulties, resulting in some major restructuring of their debts. The family also had some hostile disputes with its business partners who had accused the company of some inappropriate behaviors albeit disputed by management. Management by an overly dominant family owner and the resulting lack of accountability continues to be negative for this issuer, and we maintain our negative outlook.</p>	
Integration	



	Impact on investment decision or performance
	Our decision to avoid the company's bonds was validated by poor governance.

Example 4

Example 5

CM1 01	Mandatory	Additional Assessed	General
CM1 01.1	Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:		
<input type="checkbox"/> Third party assurance over selected responses from this year's PRI Transparency Report <input type="checkbox"/> Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year <input type="checkbox"/> Third party assurance or audit of the correct implementation of RI processes (that have been reported to the PRI this year) <input type="checkbox"/> Internal audit of the correct implementation of RI processes and/or accuracy of RI data (that have been reported to the PRI this year) <input checked="" type="checkbox"/> Internal verification of responses before submission to the PRI (e.g. by the CEO or the board) <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Whole PRI Transparency Report has been internally verified</li> <li><input type="checkbox"/> Selected data has been internally verified</li> </ul> <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above			
CM1 01.2	Additional information [OPTIONAL]		
The whole PRI Transparency Report has been internally verified by Eastspring's Chief Executive Officer for Singapore and Head of Investment Strategies; the Equity Chief Investment Officer; and The Fixed Income Chief Investment Officer.			

CM1 02	Mandatory	Descriptive	General
CM1 02.1	We undertook third party assurance on last year's PRI Transparency Report		
<input type="radio"/> Whole PRI Transparency Report was assured last year <input type="radio"/> Selected data was assured in last year's PRI Transparency Report <input type="radio"/> We did not assure last year's PRI Transparency report <input checked="" type="radio"/> None of the above, we were in our preparation year and did not report last year.			
CM1 02.3	Additional information [OPTIONAL]		
This will be our first publicly assessed report.			

CM1 03	Mandatory	Descriptive	General
CM1 03.1	We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:		
<input type="checkbox"/> We adhere to an RI certification or labelling scheme <input type="checkbox"/> We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report <input type="checkbox"/> ESG audit of holdings <input type="checkbox"/> Other, specify <input checked="" type="checkbox"/> None of the above			
CM1 03.5	Additional information [OPTIONAL]		
This will be our first publicly assessed report.			

CM1 04	Mandatory	Descriptive	General								
CM1 04.1	Do you plan to conduct third party assurance of this year's PRI Transparency report?										
<input type="radio"/> Whole PRI Transparency Report will be assured <input checked="" type="radio"/> Selected data will be assured											
CM1 04.2b	Selected data will be assured										
<table border="1"> <tr> <td colspan="2">What data will be assured</td> </tr> <tr> <td colspan="2"> <input checked="" type="checkbox"/> Financial and organisational data  <input type="checkbox"/> Data related to RI activities  <input checked="" type="checkbox"/> RI policies  <input checked="" type="checkbox"/> RI processes (e.g. engagement process)  <input type="checkbox"/> ESG operational data of the portfolio  <input type="checkbox"/> Other           </td> </tr> <tr> <td colspan="2">Relevant modules</td> </tr> <tr> <td colspan="2"> <input checked="" type="checkbox"/> Organisational Overview  <input checked="" type="checkbox"/> Strategy and Governance  <input checked="" type="checkbox"/> Direct - Listed Equity Incorporation  <input checked="" type="checkbox"/> Direct - Listed Equity Active Ownership  <input checked="" type="checkbox"/> Direct - Fixed Income           </td> </tr> </table>				What data will be assured		<input checked="" type="checkbox"/> Financial and organisational data <input type="checkbox"/> Data related to RI activities <input checked="" type="checkbox"/> RI policies <input checked="" type="checkbox"/> RI processes (e.g. engagement process) <input type="checkbox"/> ESG operational data of the portfolio <input type="checkbox"/> Other		Relevant modules		<input checked="" type="checkbox"/> Organisational Overview <input checked="" type="checkbox"/> Strategy and Governance <input checked="" type="checkbox"/> Direct - Listed Equity Incorporation <input checked="" type="checkbox"/> Direct - Listed Equity Active Ownership <input checked="" type="checkbox"/> Direct - Fixed Income	
What data will be assured											
<input checked="" type="checkbox"/> Financial and organisational data <input type="checkbox"/> Data related to RI activities <input checked="" type="checkbox"/> RI policies <input checked="" type="checkbox"/> RI processes (e.g. engagement process) <input type="checkbox"/> ESG operational data of the portfolio <input type="checkbox"/> Other											
Relevant modules											
<input checked="" type="checkbox"/> Organisational Overview <input checked="" type="checkbox"/> Strategy and Governance <input checked="" type="checkbox"/> Direct - Listed Equity Incorporation <input checked="" type="checkbox"/> Direct - Listed Equity Active Ownership <input checked="" type="checkbox"/> Direct - Fixed Income											
<input type="radio"/> We do not plan to assure this year's PRI Transparency report											

CM1 04.2a	Provide details related to the assurance that will be conducted
31/12/2019	
	Who will conduct the assurance
Prudential's Group Wide internal Audit (GWIA).	
	Assurance standard to be used
<input type="checkbox"/> ISAE/ ASEA 3000 <input checked="" type="checkbox"/> ISAE 3402 <input type="checkbox"/> ISO standard <input type="checkbox"/> AAF01/06 <input type="checkbox"/> AA1000AS <input type="checkbox"/> IFC performance standards <input type="checkbox"/> ASAE 3410 Assurance Engagements on Greenhouse Gas Statements. <input type="checkbox"/> National standard <input type="checkbox"/> Other	
	Level of assurance sought
<input checked="" type="checkbox"/> Limited or equivalent <input type="checkbox"/> Reasonable or equivalent	

**CM1 04.3** Additional information [OPTIONAL]

This will be our first publicly assessed report. The following provides further context for our assurance on the report: 1. ISAE 3402 audit focuses on philosophy and process conducted by Prudential's Group Wide internal Audit (GWIA) 2. Prudential's GWIA is currently conducting an audit with the objective to provide independent assurance in relation to the design and operation of the processes, controls and governance supporting the: (a) preparation and disclosure of the ESG Report; (b) setting of the strategy for Prudential plc's participation in discretionary environmental and responsible investment initiatives, management of commitments and delivery against these commitments; and (c) progress with TCFD commitments. We acknowledge that our current assurance processes partially cover our Responsible Investment activities. Additionally, we acknowledge the importance of assurance in building stakeholder confidence in our Responsible Investment activities. Our internal dialogue is ongoing with the aim of developing a holistic approach to assurance for our Responsible Investment activities.

CM1 07	Mandatory	Descriptive	General
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CM1 07.1	Indicate who has reviewed/verified internally the whole - or selected data of the - PRI Transparency Report . and if this applies to selected data please specify what data was reviewed
<input checked="" type="checkbox"/> CEO or other Chief-Level staff	
	Sign-off or review of responses
<input checked="" type="checkbox"/> Sign-off <input checked="" type="checkbox"/> Review of responses	
<input type="checkbox"/> The Board <input type="checkbox"/> Investment Committee <input type="checkbox"/> Compliance Function <input checked="" type="checkbox"/> RI/ESG Team <input checked="" type="checkbox"/> Investment Teams <input type="checkbox"/> Legal Department <input checked="" type="checkbox"/> Other (specify)	
	specify
The whole PRI Transparency Report has been internally verified by Eastspring's Chief Executive Officer for Singapore and Head of Investment Strategies; the Equity Chief Investment Officer; and The Fixed Income Chief Investment Officer.	