



RITRANSPARENCY REPORT 2017

Keva





About this report

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

This report is an export of the individual Signatory organisation's response to the PRI during the 2016 reporting cycle. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information. As a result, the reports can be extensive. However, to help easily locate information, there is a **Principles index** which highlights where the information can be found and summarises the indicators that signatories complete and disclose.

Understanding the Principles Index

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

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

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

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

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



Principles Index

Organisational Overview						rin	General			
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
OO 01	Signatory category and services	✓	Public							✓
OO 02	Headquarters and operational countries	✓	Public							✓
OO 03	Subsidiaries that are separate PRI signatories	✓	Public							✓
OO 04	Reporting year and AUM	✓	Public							✓
OO 05	Breakdown of AUM by asset class	~	Asset mix disclosed in OO 06							✓
OO 06	How would you like to disclose your asset class mix	✓	Public							✓
OO 07	Fixed income AUM breakdown	✓	Private							✓
OO 08	Segregated mandates or pooled funds	✓	Private							✓
OO 09	Breakdown of AUM by market	✓	Public							✓
OO 10	RI activities for listed equities	✓	Public							✓
00 11	RI activities in other asset classes	✓	Public							✓
OO 12	Modules and sections required to complete	✓	Public							✓
OO End	Module confirmation page	✓	-							

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

Indirect -	Indirect – Manager Selection, Appointment and Monitoring					rin	General			
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
SAM 01	Role of investment consultants/fiduciary managers	✓	Public				✓			
SAM 02	RI factors in selection, appointment and monitoring across asset classes	✓	Public	✓						
SAM 03	Breakdown by passive, quantitative, fundamental and other active strategies	✓	Private							✓
SAM 04	ESG incorporation strategies	✓	Public	✓	✓					
SAM 05	Selection processes (LE and FI)	✓	Public	✓						
SAM 06	Evaluating engagement and voting practices in manager selection (listed equity/fixed income)	✓	Public		~					
SAM 07.1	Appointment processes (listed equity/fixed income)	✓	Public	✓						
SAM 07.2-5	Appointment processes (listed equity/fixed income)	✓	Public	✓						
SAM 08	Monitoring processes (listed equity/fixed income)	✓	Public	~						
SAM 09	Monitoring on active ownership (listed equity/fixed income)	✓	Public	~						
SAM 10	Percentage of (proxy) votes	8	n/a		✓					
SAM 11	Percentage of externally managed assets managed by PRI signatories	✓	Private	✓						
SAM 12	Examples of ESG issues in selection, appointment and monitoring processes	✓	Public	~					✓	
SAM 13	Disclosure of RI considerations	✓	Public						✓	
SAM End	Module confirmation page	✓	-							

Direct - L	Direct - Listed Equity Incorporation				Principle					General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
LEI 01	Breakdown by passive, quantitative, fundamental and other active strategies	✓	Public							✓
LEI 02	Reporting on strategies that are <10% of actively managed listed equities	8	n/a							✓
LEI 03	Percentage of each incorporation strategy	✓	Public	✓						
LEI 04	Type of ESG information used in investment decision	✓	Public	✓						
LEI 05	Information from engagement and/or voting used in investment decision-making	✓	Public	✓						
LEI 06	Types of screening applied	✓	Public	✓						
LEI 07	Processes to ensure screening is based on robust analysis	✓	Public	✓						
LEI 08	Processes to ensure fund criteria are not breached	✓	Public	✓						
LEI 09	Types of sustainability thematic funds/mandates	8	n/a	✓						
LEI 10	Review ESG issues while researching companies/sectors	✓	Public	✓						
LEI 11	Processes to ensure integration is based on robust analysis	✓	Public	✓						
LEI 12	Aspects of analysis ESG information is integrated into	✓	Public	✓						
LEI 13	ESG issues in index construction	✓	Public	✓						
LEI 14	How ESG incorporation has influenced portfolio composition	✓	Private	~						
LEI 15	Measurement of financial and ESG outcomes of ESG incorporation	✓	Private	✓						
LEI 16	Examples of ESG issues that affected your investment view / performance	✓	Private	✓						
LEI 17	Disclosure of approach to ESG incorporation	✓	Public		✓				✓	
LEI End	Module confirmation page	✓	-							

Direct - L	Direct - Listed Equity Active Ownership						Principle				
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6		
LEA 01	Description of approach to engagement	✓	Public		✓						
LEA 02	Reasoning for interaction on ESG issues	✓	Public	✓	✓	✓					
LEA 03	Process for identifying and prioritising engagement activities	✓	Public		✓						
LEA 04	Objectives for engagement activities	✓	Public		✓						
LEA 05	Process for identifying and prioritising collaborative engagement	8	n/a		✓						
LEA 06	Objectives for engagement activities	8	n/a		✓						
LEA 07	Role in engagement process	8	n/a		✓		✓				
LEA 08	Monitor / discuss service provider information	8	n/a		✓				✓		
LEA 09	Share insights from engagements with internal/external managers	✓	Private	✓	✓						
LEA 10	Tracking number of engagements	✓	Public		✓						
LEA 11	Number of companies engaged with, intensity of engagement and effort	✓	Private		✓						
LEA 12	Engagement methods	✓	Private		✓						
LEA 13	Engagements on E, S and/or G issues	✓	Private		✓						
LEA 14	Companies changing practices / behaviour following engagement	✓	Private		✓						
LEA 15	Examples of ESG engagements	✓	Private		✓						
LEA 16	Disclosure of approach to ESG engagements	✓	Public		✓				✓		
LEA 17	Voting policy & approach	✓	Public	✓	✓	✓					
LEA 18	Typical approach to (proxy) voting decisions	✓	Public		✓						
LEA 19	Percentage of voting recommendations reviewed	8	n/a		✓						
LEA 20	Confirmation of votes	✓	Private		✓						
LEA 21	Securities lending programme	✓	Private		✓						
LEA 22	Informing companies of the rationale of abstaining/voting against management	✓	Public		✓						
LEA 23	Percentage of (proxy) votes cast	✓	Public		✓						
LEA 24	Proportion of ballot items that were for/against/abstentions	✓	Public		✓						
LEA 25	Shareholder resolutions	✓	Private		✓						
LEA 26	Examples of (proxy) voting activities	✓	Private		✓						
LEA 27	Disclosing voting activities	✓	Public		✓				✓		
LEA End	Module confirmation page	✓	-								

Direct -	Direct - Fixed Income						ciple Gene		General	
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
FI 01	Breakdown by passive,active strategies	✓	Private							✓
FI 02	Option to report on <10% assets	8	n/a							✓
FI 03	Breakdown by market and credit quality	✓	Private							✓
FI 04	Incorporation strategies applied	✓	Public	√						
FI 05	ESG issues and issuer research	✓	Private	✓						
FI 06	Processes to ensure analysis is robust	✓	Public	✓						
FI 07	Types of screening applied	✓	Public	✓						
FI 08	Negative screening - overview and rationale	✓	Public	~						
FI 09	Examples of ESG factors in screening process	✓	Private	~						
FI 10	Screening - ensuring criteria are met	✓	Public	✓						
FI 11	Thematic investing - overview	8	n/a	✓						
FI 12	Thematic investing - themed bond processes	8	n/a	✓						
FI 13	Thematic investing - assessing impact	8	n/a	✓						
FI 14	Integration overview	✓	Public	✓						
FI 15	Integration - ESG information in investment processes	1	Public	✓						
FI 16	Integration - E,S and G issues reviewed	✓	Public	✓						
FI 17	ESG incorporation in passive funds	8	n/a	✓						
FI 18	Engagement overview and coverage	✓	Private		✓					
FI 19	Engagement method	✓	Private	✓	✓					
FI 20	Engagement policy disclosure	✓	Private	✓	✓					
FI 21	Financial/ESG performance	✓	Private							✓
FI 22	Examples - ESG incorporation or engagement	✓	Private	✓	✓					
FI 23	Communications	✓	Public		✓				✓	
FI End	Module confirmation page	✓	-							

Direct - Property					P	rin	cip	le		General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
PR 01	Breakdown of investments	✓	Private							✓
PR 02	Breakdown of assets by management	✓	Private							✓
PR 03	Largest property types	-	n/a							✓
PR 04	Responsible Property Investment (RPI) policy	✓	Public	✓					✓	
PR 05	Fund placement documents and RI	8	n/a	✓			✓		✓	
PR 06	Formal commitments to RI	8	n/a				✓			
PR 07	Incorporating ESG issues when selecting investments	✓	Public	✓						
PR 08	Types of ESG information considered in investment selection	✓	Public	✓		✓				
PR 09	ESG issues impact in selection process	✓	Public	✓						
PR 10	ESG issues in selection, appointment and monitoring of third-party property managers	✓	Public				~			
PR 11	ESG issues in post-investment activities	✓	Public		✓					
PR 12	Proportion of assets with ESG targets that were set and monitored	✓	Public		✓	✓				
PR 13	Certification schemes, ratings and benchmarks	✓	Private		✓					
PR 14	Proportion of developments and refurbishments where ESG issues were considered	✓	Public		~					
PR 15	Proportion of property occupiers that were engaged with	✓	Public		✓					
PR 16	Proportion of green leases or MOUs referencing ESG issues	✓	Private		✓					
PR 17	Proportion of assets engaged with on community issues	✓	Private		✓					
PR 18	ESG issues affected financial/ESG performance	✓	Public	✓	✓					
PR 19	Examples of ESG issues that affected your property investments	✓	Private	✓		✓				
PR 20	Disclosure of ESG information to public and clients/beneficiaries	✓	Public						✓	
PR End	Module confirmation page	✓	-							

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Reported Information

Public version

Organisational Overview

PRI disclaimer

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Basic Information 00 01 **Mandatory Public** Gateway/Peering General 00 01.1 Select the type that best describes your organisation or the services you provide. Non-corporate pension or superannuation or retirement or provident fund or plan O Corporate pension or superannuation or retirement or provident fund or plan O Insurance company Foundation O Endowment O Development finance institution O Reserve - sovereign or government controlled fund O Family office Other, specify OO 02 **Mandatory Public Peering** General Select the location of your organisation's headquarters. 00 02.1 Finland 00 02.2 Indicate the number of countries in which you have offices (including your headquarters). 1 0 2-5 O 6-10 ○ >10 Indicate the approximate number of staff in your organisation in full-time equivalents (FTE). 00 02.3 FTE 550 Additional information. [Optional] OO 02.4

Keva is an independent public corporation which operates in accordance with the Local Government Pensions Act (KuEL). The Institution is supervised by the Ministry of Finance. Our member organizations include all Finnish cities, other municipalities and joint municipal boards. Municipal associations and limited liability companies may also apply for membership.

OO 03	Mandatory	Public	Descriptive	General
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00 03.1

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

○ Yes

No

OO 04 Mandatory Public Gateway/Peering General

00 04.1

Indicate the year end date for your reporting year.

31/12/2016

00 04.2

Indicate your total AUM at the end of your reporting year, excluding subsidiaries you have chosen not to report on.

	trillions	billions	millions	thousands	hundreds
Total AUM		48	523	804	002
Currency	EUR				
Assets in USD		51	930	345	313

OO 06 Mandatory Public Descriptive General

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

00 06.1

How you would like to disclose your asset class mix.

 \bigcirc as percentage breakdown

as broad ranges

	Internally managed (%)	Externally managed (%)
Listed equity	<10%	10-50%
Fixed income	10-50%	10-50%
Private equity	<10%	<10%
Property	<10%	<10%
Infrastructure	0	0
Commodities	0	0
Hedge funds	0	<10%



Forestry	0	0
Farmland	0	0
Inclusive finance	0	0
Cash	0	0
Other (1), specify	0	0
Other (2), specify	0	0

OO 06.2

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

{image:}

OO 09	Mandatory to Report Voluntary to Disclose	Public	Peering	General

00 09.1

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

	○ 0% ○ <10%
Developed Markets	○ 10-50%○ >50 %
	○ 0% ○ <10%
Emerging, Frontier and Other Markets	● 10-50%○ >50 %
Total	100%

Gateway asset class implementation indicators

00 10	Mandatory	Public	Gateway	General
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00 10.1

Select the direct or indirect ESG incorporation activities your organisation implemented for listed equities in the reporting year.

- $\ensuremath{\square}$ We incorporate ESG in our investment decisions on our internally managed assets
- ☑ We address ESG incorporation in our external manager selection, appointment and/or monitoring processes
- \square We do not incorporate ESG in our directly managed listed equity and/or we do not address ESG incorporation in our external manager selection, appointment and/or monitoring processes.



	00 10.2	Select the direct or indirect e the reporting year.	ngagement activitie	s your orga	nisation implemented for lis	sted equity in
	☑ We engage with companies on ESG factors via our staff, collaborations or service providers					
 ☑ We require our external managers to engage with companies on ESG issues on our behalf ☐ We do not engage directly and do not require external managers to engage with companies or 			s on ESG i	ssues on our behalf		
			gage with companies on ES	G factors.		
	OO 10.3	Select the direct or indirect v reporting year	oting activities your	organisatio	n implemented for listed ed	uity in the
	☑ We cas	st our (proxy) votes directly or via	dedicated voting pro	viders		
	□ We red	juire our external managers to vot	e on our behalf			
	□ We do	not cast our (proxy) votes directly	and do not require	external ma	anagers to vote on our beha	alf
00 1	1 1	landatory	Public	Ga	teway	General
	00 11.1	Select the internally manage investment decisions and/or				
	☐ Fixed i	ncome – SSA				
	☑ Fixed income – corporate (financial)					
	☑ Fixed income – corporate (non-financial)					
	☐ Fixed income – securitised					
	☑ Private equity					
	☑ Property					
	☐ None of the above					
	00 11.2	Select the externally manage active ownership in your external (during the reporting year)				
	☑ Fixed i	ncome – SSA				
	☑ Fixed income – corporate (financial)					
	☑ Fixed i	ncome – corporate (non-financial)				
	✓ Private	equity				
	✓ Proper	ty				
	☐ Hedge funds					
	_	of the above				
00 1	2	landatory	Public	Ga	teway	General

You will need to make a selection in OO 12.1onlyif you have any voluntary modules that you can choose to report on.

00 12.1

Select from below any additional applicable modules or sections you would like to report on voluntarily. You are only required to report on asset classes that represent 10% or more of your AUM.



Core modules ☑ Organisational Overview RI implementation directly or via service providers ☑ Listed Equity incorporation Direct - Listed Equity active ownership ☑ Engagements ☑ (Proxy) voting ☑ Fixed income - Corporate (financial) ☑ Fixed income - Corporate (non-financial) ☐ Private Equity ☑ Property RI implementation via external managers Indirect - Selection, Appointment and Monitoring of External Managers ☑ Listed Equities ☑ Fixed income - SSA ☑ Fixed income - Corporate (financial) ☑ Fixed income - Corporate (non-financial) ☑ Private Equity ☐ Property

Closing module

☑ Closing module

OO 12.2 Additional information. [Optional]

The procedures we apply to external manager selection in Listed Equities are also used in external Fixed Income - Corporate and Fixed Income - Government.



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Strategy and Governance

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Investment policy

SG 01 Mandatory Public Core Assessed General

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

SG 01.1

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

Yes

SG 01.2

Indicate the components/types and coverage of your policy.

Select all that apply

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

SG 01.3	Indicate if the investment policy covers any of the following	
☑ Your organisation's definition of ESG and/or responsible investment and it's relation to investments		
☐ Your inve	estment objectives that take ESG factors/real economy influence into account	
☑ Processes / approaches to incorporating ESG		
☐ Time horizon of your investment		
☐ Governance structure of organisational ESG responsibilities		
☑ ESG incorporation approaches		
☐ Active ownership approaches		
□ Reporting		
☐ Other RI considerations, specify (1)		
☐ Other RI considerations, specify (2)		



SG 01.4

Indicate what norms you have used to develop your investment policy that covers your responsible investment approach.

☑ UN Global Compact Principles
$\hfill\square$ UN Guiding Principles on Business and Human Rights
\square Universal Declaration of Human Rights
\square International Bill of Human Rights
☑ International Labour Organization Conventions
\square United Nations Convention Against Corruption
☑ OECD Guidelines for Multinational Enterprises
☐ Other, specify (1)
☐ Other, specify (2)
☐ Other, specify (3)

SG 01.5

☐ None of the above

Describe your organisation's investment principles, and overall investment strategy, and how they consider ESG factors and real economy impact.

The investment strategy of Keva is focused on providing sufficient returns to meet the pension liabilities. Given nature of liabilities, we aim to achieve this by investing with a long-term mindset. We invest in a global cross-asset portfolio by both making direct investments and drawing on the specialized expertise of our partners.

The ESG approach is different for different asset classes on one hand and insourced/outsourced modes on the other. A central starting point for Keva's ESG approach is the belief that a broader stakeholder approach and a focus on sustainability aspects by the investee often implies that it is a better investment. On the ither hand, if ESG-related controversies exist, this can be a signal of risk down the line.

 \bigcirc No

SG 02 Mandatory Public Core Assessed PRI 6

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

SG 02.1

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

 $\ensuremath{\,\boxtimes\,}$ Asset class-specific RI guidelines

URL/Attachment

☑ URL

URL

https://www.keva.fi/globalassets/2-tiedostot/tama-on-keva--tiedostot/sijoitukset-talous-ja-raportointi/responsible_investment_2015.pdf

- ☐ Attachment (will be made public)
- ☑ Screening / exclusions policy



		URL/Attachment
	☑ URL	
		URL
		//www.keva.fi/globalassets/2-tiedostot/tama-on-kevatiedostot/sijoitukset-talous-ja-tointi/responsible_investment_2015.pdf
		hment (will be made public)
V	Engageme	ent policy
		URL/Attachment
	☑ URL	
		URL
		//www.keva.fi/globalassets/2-tiedostot/tama-on-kevatiedostot/sijoitukset-talous-ja-tointi/responsible_investment_2015.pdf
	☐ Attac	hment (will be made public)
	We do not	publicly disclose our investment policy documents
SG	6 02.2	Indicate if any of your investment policy components are publicly available. Provide URL and an attachment of the document.
		Indicate if any of your investment policy components are publicly available. Provide URL and an attachment of the document. nisation's definition of ESG and/or responsible investment and it's relation to investments
		attachment of the document.
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☑	Your organ ✓ URL https: rapor □ Attac	attachment of the document. nisation's definition of ESG and/or responsible investment and it's relation to investments URL/Attachment URL //www.keva.fi/globalassets/2-tiedostot/tama-on-kevatiedostot/sijoitukset-talous-ja-tointi/responsible investment 2015.pdf
	Your organ URL https: rapor Attac Processes	attachment of the document. inisation's definition of ESG and/or responsible investment and it's relation to investments URL/Attachment URL //www.keva.fi/globalassets/2-tiedostot/tama-on-kevatiedostot/sijoitukset-talous-jatointi/responsible_investment_2015.pdf
	Your organ URL https: rapor Attac Processes ESG incor	attachment of the document. inisation's definition of ESG and/or responsible investment and it's relation to investments URL/Attachment URL //www.keva.fi/globalassets/2-tiedostot/tama-on-kevatiedostot/sijoitukset-talous-jatointi/responsible_investment_2015.pdf hment // approaches to incorporating ESG
	Your organ URL https: rapor Attac Processes ESG incor	attachment of the document. nisation's definition of ESG and/or responsible investment and it's relation to investments URL/Attachment URL //www.keva.fi/globalassets/2-tiedostot/tama-on-kevatiedostot/sijoitukset-talous-jatointi/responsible investment 2015.pdf hment / approaches to incorporating ESG poration approaches
Sec	Your organ URL https: rapor Attac Processes ESG incor We do not	attachment of the document. Inisation's definition of ESG and/or responsible investment and it's relation to investments URL/Attachment URL //www.keva.fi/globalassets/2-tiedostot/tama-on-kevatiedostot/sijoitukset-talous-ja-tointi/responsible investment 2015.pdf hment // approaches to incorporating ESG poration approaches publicly disclose any investment policy components Indicate if your organisation's investment principles, and overall investment strategy is publicly



SG 03.1 Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.

O Yes

No

Objectives and strategies

SG 05 Mandatory Public Gateway/Core Assessed General

SG 05.1 investm

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

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

SG 05.2

Additional information. [Optional]

The objectives are set by the RI Steering group; as such they are not formal or part of management level objectives or official yearly assessment.

Governance and human resources

SG 07 Mandatory Public Core Assessed General

SG 07.1

Indicate the roles present in your organisation and for each, indicate whether they have oversight and/or implementation responsibilities for responsible investment.



□ Imp	☐ Implementation of responsible investment			
·	 ☐ Implementation of responsible investment ☐ No oversight/accountability or implementation responsibility for responsible investment 			
	nief-level staff or head of department		y for responsible investment	
	each investment team	i, opoony		
	ersight/accountability for responsible	investment		
	lementation of responsible investme			
-	oversight/accountability or implemer		y for responsible investment	
✓ Portfolio			,	
	ersight/accountability for responsible	investment		
	lementation of responsible investme			
□ No	oversight/accountability or implemer	ntation responsibilit	y for responsible investment	
✓ Investme	ent analysts			
☐ Oversight/accountability for responsible investment				
☑ Implementation of responsible investment				
□ No	oversight/accountability or implemer	ntation responsibility	y for responsible investment	
☐ Dedicate	d responsible investment staff			
	managers or service providers			
☐ Oversight/accountability for responsible investment				
☑ Imp	☑ Implementation of responsible investment			
□ No	oversight/accountability or implemer	ntation responsibilit	y for responsible investment	
☐ Investor	relations			
☐ Other rol	e, specify (1)			
☐ Other rol	e, specify (2)			
		20.0		
SG 07.3	Indicate the number of dedicated re	esponsible investme	ent staff your organisation has.	
	Number			
1				
Promoting r	esponsible investment			
		Dublic	0	DDI 4.5
Mano	latory	Public	Core Assessed	PRI 4,5

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

SG 09

SG 09.1

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

Select all that apply

☑ Principles for Responsible Investment Your organisation's role in the initiative during the reporting period (see definitions) ☑ Basic □ Moderate ☐ Advanced ☐ AFIC – La Commission ESG ☐ Asian Corporate Governance Association ☐ Australian Council of Superannuation Investors ☐ BVCA – Responsible Investment Advisory Board ☑ CDP Climate Change Your organisation's role in the initiative during the reporting period (see definitions) ☑ Basic □ Moderate ☐ Advanced ☑ CDP Forests Your organisation's role in the initiative during the reporting period (see definitions) ☑ Basic □ Moderate ☐ Advanced



☑ CDP Water

	□ Moderate □ Advanced			
	☐ CFA Institute Centre for Financial Market Integr	ritv		
	☐ Code for Responsible Investment in SA (CRISA	-		
	☐ Code for Responsible Finance in the 21st Cent			
	☐ Council of Institutional Investors (CII)	•		
	☐ ESG Research Australia			
	☐ Eumedion			
	☐ EVCA – Responsible Investment Roundtable			
	☐ Extractive Industries Transparency Initiative (E	ITI)		
	\square Global Investors Governance Network (GIGN)			
	\square Global Impact Investing Network (GIIN)			
	\square Global Real Estate Sustainability Benchmark (GRESB)		
	☐ Green Bond Principles			
	$\hfill\Box$ Institutional Investors Group on Climate Chang	e (IIGCC)		
	$\hfill\Box$ Interfaith Center on Corporate Responsibility (I	CCR)		
	$\hfill\square$ International Corporate Governance Network (I	CGN)		
	$\hfill\square$ Investor Group on Climate Change, Australia/N	lew Zealand (IGCC))	
	\square International Integrated Reporting Council (IIRC	C)		
	$\hfill\square$ Investor Network on Climate Risk (INCR)/CERI	≣S		
	\square Local Authority Pension Fund Forum			
	☐ Principles for Sustainable Insurance			
	☑ Regional or National Social Investment Forums	(e.g. UKSIF, Euros	sif, ASRIA, RIAA), specify	
	FINSIF			
	Your organisation's role in the	nitiative during the	reporting period (see definitions)	
	☑ Basic			
	☐ Moderate			
	☐ Advanced			
	$\hfill\square$ Responsible Finance Principles in Inclusive Fin	ance		
	☐ Shareholder Association for Research and Edu	cation (Share)		
	☐ United Nations Environmental Program Finance Initiative (UNEP FI)			
	☐ United Nations Global Compact			
	☐ Other collaborative organisation/initiative, spec	ify		
	☐ Other collaborative organisation/initiative, spec	ify		
	☐ Other collaborative organisation/initiative, spec	ify		
	☐ Other collaborative organisation/initiative, spec	ify		
SG 10	Mandatory	Public	Core Assessed	PRI 4



SG 10.1

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

○ Yes

No

Implementation not in other modules

SG 12 Mandatory Public Descriptive PRI 1

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

SG 12.1 Indicate if your organisation executes scenario analysis and/or modelling in which the risk profile of future ESG trends at portfolio level is calculated.

☐ We execute scenario analysis which includes factors representing the investment impacts of future environmental trends

 \Box We execute scenario analysis which includes factors representing the investment impacts of future social trends

□ We execute scenario analysis which includes factors representing the investment impacts of future governance trends

☐ We execute other scenario analysis, specify

☑ We do not execute such scenario analysis and/or modelling

SG 12.2 "as

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

- O We do the following
- We do not consider ESG issues in strategic asset allocation

SG 15 Mandatory Public Descriptive General

SG 15.1

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	ESG is part of our due diligence direct Private Equity investments. After an investment has been made, we continue to discuss ESG matters directly with the management and our co-investors when applicable.

SG 16 Mandatory Public Descriptive General

SG 16.1

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

Asset Class	Describe what processes are in place and the outputs or outcomes achieved
Property	ESG matters are mainly considered in our PERE investment manager selection and especially in our PERE fund due diligence. We have advisory board seats in many funds in our portfolio. That is a good place to discuss about ESG and UNPRI signatory matters with the manager and other investors. Many of our PERE managers are also participating in GRESB and we rank those managers higher.
Hedge funds	ESG is part of our hedge fund due diligence. We rank the managers higher that are signatories of HSFB (Hedge Fund Standard Board) and UNPRI, and hence have integrated their practices accordingly.

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Reported Information

Public version

Indirect – Manager Selection, Appointment and Monitoring

PRI disclaimer

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



Overview

SAM 01 Mandatory Public Core Assessed PRI 4

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

SAM 01.1

Indicate whether your organisation uses investment consultants and/or fiduciary managers.

SAM 01.2

Indicate how your organisation uses investment consultants in the selection, appointment and/or monitoring of external managers.

- ☐ We use investment consultants in our selection and appointment of external managers
- ☑ We use investment consultants in our monitoring of external managers

Asset class

- ☑ Listed Equity (LE)
- ☑ Fixed income SSA
- ☑ Fixed income Corporate (financial)
- ☑ Fixed income Corporate (non-financial)
- ☐ Private equity (PE)

SAM 01.3

Indicate if your organisation considers responsible investment in the selection, appointment and/or review processes for investment consultants.

- ☐ Responsible investment is incorporated in the selection process for investment consultants
- ☐ Consultants' responsibilities in terms of responsible investment in manager selection, appointment and monitoring processes are included in our contractual agreements with them.
- ☐ Responsible investment is considered when reviewing investment consultants' advice on manager selection and performance monitoring.
- ☑ We do not consider responsible investment in the selection, appointment and/or review processes for investment consultants.
- ☐ Yes, we use a fiduciary manager that delegates management of some or all of our assets to third-party managers.
- \square No, we do not use investment consultants or fiduciary managers.

SAM 01.7

Additional information [Optional].

Althought reposnsible investment has not been a criteria in the selection/appointment of investment consultants, we have used the ESG knowledge of our consultants on several occasions.

SAM 02 Mandatory Public Gateway PRI 1



SAM 02.1

Indicate for which of the following externally managed asset classes your organisation, and/or your investment consultants, consider responsible investment factors in investment manager: (a) Selection, (b) Appointment (investment management agreements/contracts), and (c) Monitoring

Select all that apply

Asset classes	(a) Selection	(b) Appointment	(c) Monitoring
Listed equity	abla	V	\checkmark
Fixed income - SSA	V	7	V
Fixed income - Corporate (financial)	V	V	V
Fixed income - Corporate (non-financial)	V	7	V
Private equity	V	V	V

SAM 02.2

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

In the external equity and fixed income team, we consider ESG aspects in the selection process through questions in our RFP. In addition to these explicit questions, we only choose managers who share our long investment horizon, which means their values are aligned with ours. Given the long term investment horizon of our managers, in most cases they do incorporate ESG analysis into their investment decision making. In our investment management agreements/contracts, a norm-based exclusion screen (on inhumane weapons) is applied, but other than that we do not include explicit ESG criteria.

In our monitoring process we often discuss ESG issues with our managers. In addition to these ad hoc conversations we have an annual ESG questionnaire sent to all of our external equity and FI managers.

In Private Equity we question the fund managers on ESG matters in our due diligence process. ESG is also discussed in the Limited Partner Advisory Committees annually in the majority of our funds. Many of our funds have introduced annual ESG reporting, making it more transparent to monitor the progress on ESG aspects.

	Listed	d Equ	ity and Fixed Income Strategies	;		
SAM	04	Man	datory	Public	Gateway	PRI 1,2
	SAM 0	4.1	Indicate which of the following ESG to implement on your behalf:	incorporation strat	egies you require your external m	nanager(s)
			Active investment strategies			



Active investment strategies	Listed Equity	FI - SSA	FI - Corporate (financial)	FI - Corporate (non- financial)
Screening	\checkmark	\checkmark	v	
Thematic				
Integration				
None of the above				

Passive investment strategies

Passive investment strategies	Listed Equity		
Screening	\checkmark		
Thematic			
Integration			
None of the above			

SAM 04.2

Explain how you integrate ESG factors in the selection, appointment and monitoring of your passive funds

We do not integrate ESG factors in the selection process, but in the appointment process apply a norm-based screen (inhumane weapons) to our passive investments.

SAM 04.3

Additional information. [Optional

Although we do not officially require our managers to incorporate ESG, the majority of them do. That is because we seek managers that share our long term, fundamental research based investment philosophy, in which case ESG issues can often be material.

We use norm-based sceening in our external mandates but that only includes inhumane weapons.

Selec	tion			
SAM 05	Mandatory	Public	Core Assessed	PRI 1



SAM 05.1

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

	LE	FI - SSA	FI - Corporate (financial)	FI - Corporate (non- financial)	Private equity	
Investment strategy and how ESG objectives relate to it	V	V				
ESG incorporation requirements						
ESG reporting requirements						
Other	V	V	V		V	
No RI information covered in the RFPs						

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

In external equity and FI manager selection, we cover three ESG-related topics in our RFP: general approach to responsible investing, whether ESG is incorporated into research, and whether the manager has signed the UNPRI. Investment strategy is covered in a different section but naturally related to the question on RI approach.

In Private Equity ESG is covered in the DDQ we send to fund managers. Some managers provide their own DDQ's and ESG aspects are included in these DDQ usually as well.

SAM 05.2

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

Strategy



	LE	FI - SSA	FI - Corporate (financial)	FI - Corporate (non-financial)	Private equity	
Assess the time horizon of the investment manager's investment strategy	V	V			V	
Assess the quality of investment policy and its reference to ESG						
Assess the investment approach and how ESG objectives are implemented in the investment process (asset class specific)	V	V			V	
Assess the ESG definitions to be used						
Other						
None of the above						

ESG people/oversight

	LE	FI - SSA	FI - Corporate (financial)	FI - Corporate (non-financial)	Private equity	
Assess ESG expertise of investment teams						
Review the ownership of the ESG implementation						
Review how is ESG implementation enforced /ensured						
Other						
None of the above	\checkmark	V	V	V	V	

Process/portfolio construction/investment valuation



	LE	FI - SSA	FI - Corporate (financial)	FI - Corporate (non-financial)	Private equity	
Review the process ensuring the quality of the ESG data used						
Review and agree the investment decision making process (and ESG data use in it)	V	V	Ø	Ø	V	
Review and agree the ESG incorporation strategy impact of ESG analysis on investment decisions	V	V				
Review and agree how the manager is targeting returns and ESG objectives						
Review and agree how the manager identifies, measures and manages ESG risk						
Review and agree return and risk in combination at a portfolio level (portfolio construction) and ESG objectives						
Review how ESG materiality is evaluated by the manager in the monitored period						
Review process for defining and communicating on ESG incidents						
Other, specify						
None of the above						

						following:	
	LE	FI - SSA	FI - Corporate (financial)	e FI - Co	rporate (non- al)	Private equity	
ESG score							
ESG weight							
Real world economy targets							
Other RI considerations							
None of the above	V	V	<u> </u>			V	\dashv
SAM 05.5 Pro In external equity, FI considered or asked qualitative one, cons SAM 06 Mandator	and F in oui iderin	Private Eq r RFP or D g all aspe	uity manager se DDQ. The asses cts related to the	lection, we do not sment is made by	our internal portfolio ger firm, people, pro Additional Asse	s to any of the managers an ocess, philoso	e factors d is a phy etc.

SAM 05.3

Describe the selection process

	LE	FI - SSA	FI - Corporate (financial)	FI - Corporate (non-financial)	
Review the manager's engagement policy					
Review the manager's engagement process (with examples and outcomes)	V	V	V		
Ensure that engagement outcomes feed back into he investment decision-making process					
Other engagement issues in your selection process pecify					
None of the above					
SAM 06.2 Describe how you assess if the r	nanao	ner's enga	agement approach is	effective	•
	Παπας	ger a erige	адетен арргоаст в	Silcotivo.	
☐ Impact on investment decisions					
 ☐ Impact on company / asset level ☐ Impact on ESG profile or the portfolio 					
☐ Evidence of changes in corporate practices					
☐ Other, specify					
☑ None of the above					
Appointment					
Appointment M 07.1 Mandatory	F	Public	Core Asses	sed	PRI 1
- 17	s and	where the	e structure of the proc		
M 07.1 Mandatory Indicate if in the majority of cases	s and	where the	e structure of the proc		
M 07.1 Mandatory SAM 07.1 Indicate if in the majority of cases does any of the following as part	s and	where the	e structure of the proc		
M 07.1 Mandatory SAM 07.1 Indicate if in the majority of cases does any of the following as part ✓ Sets standard or ESG benchmarks	s and of the	where the manage	e structure of the proc		
M 07.1 Mandatory SAM 07.1 Indicate if in the majority of case does any of the following as part ✓ Sets standard or ESG benchmarks □ Defines ESG objectives □ Sets incentives and controls linked to the obj □ Requires reporting on these objectives	s and of the	where the manage	e structure of the proc		
M 07.1 Mandatory SAM 07.1 Indicate if in the majority of cases does any of the following as part ✓ Sets standard or ESG benchmarks □ Defines ESG objectives □ Sets incentives and controls linked to the obj □ Requires reporting on these objectives □ None of the above	s and of the	where the manage	e structure of the proc er appointment	luct allows, your orga	
M 07.1 Mandatory SAM 07.1 Indicate if in the majority of case does any of the following as part ✓ Sets standard or ESG benchmarks □ Defines ESG objectives □ Sets incentives and controls linked to the obj □ Requires reporting on these objectives	s and of the	where the manage	e structure of the proc er appointment	luct allows, your orga	
M 07.1 Mandatory SAM 07.1 Indicate if in the majority of cases does any of the following as part ✓ Sets standard or ESG benchmarks □ Defines ESG objectives □ Sets incentives and controls linked to the obj □ Requires reporting on these objectives □ None of the above	s and of the ective	where the manage	e structure of the proc er appointment	luct allows, your orga	
M 07.1 Mandatory SAM 07.1 Indicate if in the majority of cases does any of the following as part ✓ Sets standard or ESG benchmarks ☐ Defines ESG objectives ☐ Sets incentives and controls linked to the obj ☐ Requires reporting on these objectives ☐ None of the above ☐ None of the above, we invest only in pooled to	ective	where the manage es	e structure of the proder appointment e a thorough selection Core Asses	luct allows, your organized	anisatio



Asset class

☑ Listed equity (LE)

Benchmark

Standard benchmark, specify

Mainstream index products

O ESG benchmark, specify

Objectives

We do not define ESG objectives

Incentives and controls

We do not set incentives and controls

Reporting requirements

• We do not require the reporting on ESG objectives

☑ Fixed income - SSA (SSA)

Benchmark

Standard benchmark, specify

Mainstream index products

 $\bigcirc \ \mathsf{ESG} \ \mathsf{benchmark}, \mathsf{specify}$

Objectives

We do not define ESG objectives

Incentives and controls

We do not set incentives and controls

Reporting requirements

• We do not require the reporting on ESG objectives

 $\ oxdot$ Fixed income - Corporate (financial)

Benchmark

Standard benchmark, specify

Mainstream index products

 \bigcirc ESG benchmark, specify



Objectives We do not define ESG objectives Incentives and controls We do not set incentives and controls Reporting requirements • We do not require the reporting on ESG objectives ☑ Fixed income - Corporate (non-financial) **Benchmark** Standard benchmark, specify Mainstream index products O ESG benchmark, specify Objectives We do not define ESG objectives Incentives and controls • We do not set incentives and controls Reporting requirements We do not require the reporting on ESG objectives ☐ Private equity Explain which of these actions your organisation might take if any of the requirements are not met **SAM 07.4** ☐ Discuss requirements not met and set project plan to rectify ☑ Review performance in more detail ☐ Place investment manager on a "watch list" ☐ Investigate reason for non-compliance ☐ Require action plan from the manager □ Negotiate fees ☐ Failing all actions, terminate contract with the manager ☐ Other, specify

SAM 07.5

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

The benchmarks we set are usually standard market capitalisation based indexes and the objectives are related to outperforming the benchmark.



 \square No actions are taken if any of the requirements are not met

Monitoring

SAM 08 Mandatory Public Core Assessed PRI 1

SAM 08.1

When monitoring managers, indicate which of the following types of responsible investment information your organisation typically reviews and evaluates from the investment manager in meetings/calls

	LE	FI - SSA	FI - Corporate (financial)	FI - Corporate (non-financial)	Private equity
ESG objectives linked to investment strategy					
Investment restrictions and any controversial investment decisions					
ESG incorporation objectives (with examples)					
ESG portfolio characteristics					
How ESG materiality has been evaluated by the manager in the monitored period	V	V			
Information on any ESG incidents	V	V	V	V	
Metrics on the real economy influence of the investments					
PRI Transparency Reports					
PRI Assessment Reports					
Other general RI considerations in investment management agreements; specify					
None of the above					



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

We do not review the above mentioned systematically for every manager, but they come across in our discussions. In a typical call / meeting we have with our managers we go through stock or bond examples from their portfolios, and these often have an ESG angle. In general, we do not have a formal review agenda in place for calls / metings with our managers. In Private Equity we discuss ESG aspects annually with our managers, but there is no set framework for the dicussion, as the investment types cover a wide range.

SAM 08.2 When monitoring external managers, does your organisation set any of the following to measure compliance/progress

	LE	FI - SSA	FI - Corporate (financial)	FI - Corporate (non- financial)	Private equity	
ESG score						
ESG weight						
Real world economy targets						
Other RI considerations						
None of the above	\checkmark	V	V	v	V	

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

Our monitoring process is qualitative and we do not set scores/weights to any factors considered.

SAM	MM 09 Mandatory		Public	Additional Assessed	PRI 1	
	SAM 0	9.1	When monitoring managers, indicat organisation typically reviews and e			
			Engagement			



	LE	FI - SSA	FI - Corporate (financial)	FI - Corporate (non-financial)	
Report on engagements undertaken (outcomes and examples)	V	V			
Account on engagement ESG impacts					
Other RI considerations relating to engagement in investment management agreements; specify					
None of the above					

Outputs and outcomes

SAM 12 Mandatory Public Additional Assessed PRI 1,6

SAM 12.1

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

☑ Add Example 1



Topic or issue	Monitoring: ESG integration
Conducted by	✓ Internal staff ☐ Investment consultants
Asset class	 □ All asset classes ☑ Listed Equity □ Fixed income – SSA □ Fixed income – corporate (financial) □ Fixed income – corporate (financial) □ Private equity
Scope and process	During an on-site visit to one of our US equity managers, we discussed their recently implemented ESG rating service by an outside service provider. The manager was keen to hear our opinion on their approach, which we encouraged, especially given that US managers ofter lag behind their European peers when it comes to ESG integration.
Outcomes	We will continue to discuss their ESG implementation in future meetings / calls. In our annual ESG survey, the manager highlighted three specific engagement cases and in at least one of them, ESG research by the outside service provider was used as the starting point.

☑ Add Example 2

Topic or issue	Monitoring: quantitative ESG intergration
Conducted by	☑ Internal staff
Asset class	□ All asset classes □ Listed Equity ☑ Fixed income – SSA □ Fixed income – corporate (financial) □ Fixed income – corporate (financial) □ Private equity
Scope and process	One of our EMD managers reported in our annual ESG survey the findings of their proprietary ESG integration model. Their Valuation and Rating Model is an imporant overlay to their investment process and captures (statistically significant) ESG variables' effect on yield spreads and returns. All of this has been developed in-house by the manager's Research Director.
Outcomes	Two cases were discussed in follow-up interactions with the manager.

☑ Add Example 3

Topic or issue	Monitoring: ESG integration
Conducted by	✓ Internal staff ☐ Investment consultants
Asset class	□ All asset classes □ Listed Equity □ Fixed income – SSA □ Fixed income – corporate (financial) □ Fixed income – corporate (financial) □ Private equity
Scope and process	We are encouraging our US managers to include ESG in their annual reporting and suggesting that we discuss ESG aspects during one of the annual LPAC meetings. Our European managers are further in their ESG reporting and we share best practices with our US managers that are lagging behind.
Outcomes	Our managers are keen to respond to our requests. The ESG matters have first been taken on the agenda for LPAC meetings, including them in the reporting is slower, but gradually more of our managers are taking the step.
□ Add Ex □ Add Ex □ We are	·

Communication

SAM 13 Mandatory Public Core Assessed PRI 6

SAM 13.1

Indicate if your organisation proactively discloses any information about responsible investment considerations in your indirect investments.

Yes, we disclose information publicly

provide URL

https://www.keva.fi/globalassets/2-tiedostot/tama-on-keva--tiedostot/sijoitukset-talous-ja-raportointi/responsible investment 2015.pdf

SAM 13.2

Indicate if the level of information you disclose to the public is the same as that disclosed to clients and/or beneficiaries.

Yes



SAM 13.3

Indicate what type of information your organisation proactively discloses to the public and clients and/or beneficiaries about your indirect investments.

	☑ How responsible investment considerations are included in manager selection, appointment and monitoring processes
	\square Details of the responsible investment activities carried out by managers on your behalf
	\square E, S and/or G impacts and outcomes that have resulted from your managers' investments and active ownership
	□ Other, specify
\circ No	
O Yes, we	e disclose information to clients/beneficiaries only
○ We do	not proactively disclose information to the public and/or clients/beneficiaries

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Reported Information

Public version

Direct - Listed Equity Incorporation

PRI disclaimer

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Overview LEI 01 Mandatory to Report Voluntary to Public Gateway General Disclose

LEI 01.1

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

Percentage of internally managed listed equities

	Passive
42	
	Active - quantitative (quant)
0	
	Active - fundamental and active - other
58	
	Total

100%

ESG incorporation in actively managed listed equities

LEI 03 Mandatory Public Gateway PRI 1

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

LEI 03.1

Implementation processes

Indicate (1) which ESG incorporation strategy and/or combination of strategies you apply to your actively managed listed equities and (2) the breakdown of your actively managed listed equities by strategy or combination of strategies (+/- 5%)

ESG incorporation strategy (select all that apply)



\square Screening alone (i.e. not con	nbined with any other strategies)
\square Thematic alone (i.e. not com	bined with any other strategies)
☐ Integration alone (i.e. not con	mbined with any other strategies)
☑ Screening and Integration st	rategies
Percentage of active listed equity to	
which the strategy is applied	%
	100
☐ Thematic and integration stra	ategies
☐ Screening and thematic strate	tegies
\square All three strategies combined	d
\square We do not apply incorporation	on strategies
Total actively mana	ged listed equities

100%

LEI 03.2

Describe your organisation's approach to incorporation and the reasons for choosing the particular ESG incorporation strategy/strategies.

According to our investment philosophy, stocks are selected based on several quality criterion, one of which is the management of ESG issues and thus ESG evaluation is intergrated directly in our investment process. Furthermore, we use screening and research by an external advisor, service provider to complement our own resources. In addition to our active portfolios, we also apply ESG screening to our passive strategy (42% of internally managed equities).

LEI 03.3

Where assets are managed using a combination of ESG incorporation strategies, briefly describe how these combinations are used. [Optional]

Management of ESG issues of a company is evaluated in our stock selection process and thus integrated in the decision making. All active and passive portfolios are screened twice a year by an external service provider to ensure information on new possible ESG violations.

LEI 04 Voluntary Public Additional Assessed PRI 1

LEI 04.1

Indicate what ESG information you use in your ESG incorporation strategies and who provides this information.

Type of ESG information

☐ Raw ESG company data

☑ Company-related analysis or ratings

Indicate who provides this information



☑ ESG	research provider
☑ Sell-	side
□ In-ho	ouse – specialised ESG analyst or team
☑ In-ho	ouse – analyst or portfolio manager
Sector-rel Sector-rel	lated analysis or ratings
	who provides this information
☑ ESG	research provider
☑ Sell-	side
□ In-ho	ouse – specialised ESG analyst or team
☑ In-ho	ouse – analyst or portfolio manager
☐ Country-r	elated analysis or ratings
	I stock list
Indicate v	who provides this information
☑ ESG	research provider
☐ Sell-	side
□ In-ho	ouse – specialised ESG analyst or team
□ In-ho	ouse – analyst or portfolio manager
☐ ESG issu	e-specific analysis or ratings
☐ Other, sp	ecify
LEI 04.2	Provide a brief description of the ESG information used, highlighting any differences of sources of information across your ESG incorporation strategies.
Company and	sector research by sell side analysts is extensively used. Furthermore, other public information on
	pages (eg. sustainablity reports), company meetings and discussions with company management it to company culture and processes. External service provider analyzes companies and sectors
	eir information on violations and their engagement with the companies.
LEI 04.3	Indicate if you incentivise brokers to provide ESG research.
○ Yes	
No	

Brokers are incentivised by ranking the quality of their research - thus including indirectly ESG research

LEI 05 Voluntary Public Additional Assessed PRI 1



LEI 04.5

LEI 05.1

Indicate if 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.

- We have a systematic process to ensure the information is made available.
- O We occasionally make this information available.
- O We do not make this information available.
- ☐ (Proxy) voting

LEI 05.2

Additional information. [Optional]

We have access to the research portal and weekly alerts issued by our external ESG research and service provider. Furthermore, twice a year the external ESG service provider screens our portfolios and reports us the violations, the engagement activities and discussions with these companies as well as any progress. All this information is passed to portfolio managers and made available on our intranet immediately.

(A) Implementation: Screening

LEI 06 Mandatory Public Descriptive PRI 1

LEI 06.1

Indicate and describe the type of screening you apply to your internally managed active listed equities.

Type of screening

☑ Negative/exclusionary screening

Screened by

- ☐ Product
- □ Activity
- □ Sector
- ☐ Country/geographic region
- $\ensuremath{\square}$ Environmental and social practices and performance
- ☐ Corporate governance

Description

The portfolios are screened twice a year by the external service provider who does global research as well as engagement on companies, sectors and countries and the screening is based on their classification and recommendations

- ☐ Positive/best-in-class screening
- ☑ Norms-based screening

Screened by



☑ UN Global Compact Principles
$\hfill\Box$ The UN Guiding Principles on Business and Human Rights
☑ International Labour Organization Conventions
\square United Nations Convention Against Corruption
☑ OECD Guidelines for Multinational Enterprises
☐ Other, specify

Description

The portfolios are screened twice a year by the external service provider who does global research as well as engagement on companies, sectors and countries and the screening is based on their classification and recommendations

LEI 06.2

Describe how the screening criteria are established, how often the criteria are reviewed and how you notify clients and/or beneficiaries when changes are made.

The external service provider has establised the criterion for the classification of violations and the recommendations are based on these criterion. The review of criterion as well as research on companies, sectors and countries is a continous process. The screenings of the portfolios are run twice a year.

LEI 07	Mandato	ory	Public	Core Assessed	PRI 1
			·		
	LEI 07.1	Indicate which processes your analysis.	organisation uses	to ensure screening is based on	robust
		ensive ESG research is undertak	ken or sourced to d	etermine companies' activities an	d products.
		es are given the opportunity by y inaccuracies	ou or your research	n provider to review ESG research	n on them
		research and data used to identif staff, the internal audit function or	, ,	excluded/included is subject to in	ternal audit
		/ ESG information/ratings are upo	dated regularly to e	nsure that portfolio holdings comp	oly with fund
		ttee or body with representatives ne or all screening decisions	independent of the	individuals who conduct compan	y research
	☐ A periodic	c review of the quality of the rese	arch undertaken or	provided is carried out	
	☐ Other, sp	ecify			
	☐ None of t	he above			
LEI 08	Volunta	ry	Public	Additional Assessed	PRI 1



LEI 08.1	Indicate which processes your organisation uses to ensure fund criteria are not breached				
☑ Systemat	ic checks are performed to ensure that stocks meet the funds' screening criteria.				
	☐ Automated IT systems prevent investment managers from investing in excluded stocks or those that do not meet positive screening criteria.				
☐ Audits of	☐ Audits of fund holdings are undertaken regularly by internal audit function				
\square Other, sp	☐ Other, specify				
☐ None of t	he above				
LEI 08.2	If breaches of fund screening criteria are identified - describe the process followed to correct those breaches.				

When a new company is identified and reported to have breached ESG criteria, we have defined a process in our ESG poliicy: According to this policy, further investments are not made on the company shares, we start engament immediately by studing the case, contacting the violating company and discussing the violation, the policy and the actions of the company. If the engagement is considerd ineffective on the company's practices or policies, the company will be excluded from the investment universe and the holdings will be sold. Only if and when the company will be reported to have made corrective actions, we can invest again on the company.

(C) Implementation: Integration of ESG issues LEI 10 Mandatory Public Core Assessed PRI 1 LEI 10.1 Indicate if E, S and G issues are reviewed while researching companies and/or sectors in active strategies.

ESG issues	Coverage/extent of review on these issues
Environmental	Environmental
	We systematically review the potential significance of environmental issues and investigate them accordingly
	We occasionally review the potential significance of environmental issues and investigate them accordingly
	○ We do not review environmental issues
Social	Social
	 We systematically review the potential significance of social issues and investigate them accordingly
	 We occasionally review the potential significance of social issues and investigate them accordingly
	○ We do not review social issues
Corporate Governance	Corporate Governance
00.10111311100	We systematically review the potential significance of corporate governance issues and investigate them accordingly
	O We occasionally review the potential significance of corporate governance issues and investigate them accordingly
	We do not review corporate governance issues

.EI I I	Volulitai	У	Public	Additional Assessed	PKII
	LEI 11.1	Indicate which processes your robust analysis.	organisation uses	to ensure ESG integration is base	ed on a
		ensive ESG research is undertak	en or sourced to de	etermine companies' activities an	d products
		es are given the opportunity by yo inaccuracies	ou or your research	provider to review ESG research	n on them
	☑ Company	information and/or ratings on ES	G are updated reg	ularly	
	☐ A periodic	review of the quality of the rese	arch undertaken or	provided is carried out	
		d, regular ESG specific meetings vestments team	between responsil	ole investment staff and the fund	manager or
	☐ ESG risk	profile of a portfolio against bend	hmark		
	\square Other, sp	ecify			
	☐ None of t	he above			



	LEI 11.	2 Describe how ESG information	n is held and u	sed by your portfolio managers	
	☑ ESG	G information is held within centralised	d databases or	tools and it is accessible by all	relevant staff
		G information or analysis is a standard y/sector analysis generated by invest		pect of all company research no	otes or
		tematic records are kept that capture nent decisions	how ESG infor	mation and research was inco	rporated into
	□ Othe	er, specify			
		e of the above			
LEI 1		ndatory to Report Voluntary to close	Public	Core Assessed	PRI 1
	carefully				
	LEI 12.	Indicate which aspects of inve	estment analysi	is you integrate ESG information	on into.
	□ Eco	nomic analysis			
	✓ Indu	istry analysis			
	•	Systematically			
	С	Occasionally			
	☑ Qua	lity of management			
	•	Systematically			
	C	Occasionally			
	☑ Ana	lysis of company strategy			
	•	Systematically			
	С	Occasionally			
	□ Port	folio construction			
	☐ Fair	value/fundamental analysis			
	□ Othe	er, specify			
	ESG incor	poration in passively managed	listed equiti	es	
LEI 1		ndatory to Report Voluntary to close	Public	Descriptive	PRI 1
	LEI 13.1	Indicate if you manage passive list construction methodology.	ted equity funds	s that incorporate ESG issues	in the index
	Yes				

LEI 13.2

Indicate the percentage of your total passive listed equity funds for which ESG issues are incorporated in the index construction methodology.



		(% of total passive listed equity f	unds)		
	○ <10%				
	O 10-50%				
	○ 51-90%				
	• >90%				
	LEI 13.3	Specify index/fund name, provide of the following ESG incorporation			cate whic
	☑ Index/fund	I 1			
In	dex/fund nar	ne and brief description of ESG n	nethodology	ESG incorporation strategy	
Ke	eva Passive E	urope: norm based screening twice	a year/exlusion	☑ Screening	1
				☐ Thematic	
				☐ Integration of ESG issues	
				☐ Other	
	☐ Index/fund	12			_
	☐ Index/fund	13			
	☐ Index/fund	14			
	☐ Index/fund	15			
O N	0				
Con	nmunication	1			
	Mandato	ry P	ublic	Core Assessed	PRI 2,
LEI 1	17.1 Indi	icate if your organisation proactively proporation in listed equity.	/ discloses inform	nation on your approach to ESG	
● W	e disclose it p	publicly			
		Provide URL			
ht	tps://www.kev	va.fi/tama-on-keva/sijoitukset/			
_					
		Provide URL			



LEI 17.2

Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.

Yes

LEI 17.3

Indicate the information your organisation proactively discloses to clients/ beneficiaries and the public regarding your approach to ESG incorporation.

- Broad approach to ESG incorporation
- O Detailed explanation of ESG incorporation strategy used

LEI 17.4

Indicate how frequently you typically report this information.

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

 \bigcirc No

- $\ensuremath{\bigcirc}$ We disclose it to clients and/or beneficiaries only
- O We do not proactively disclose it to the public and/or clients/beneficiaries

LEI 17.7

Additional information. [Optional

The information is disclosed on our web-pages and is publicly and continuously available



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Public version

Direct - Listed Equity Active Ownership

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Engagement

Overview

LEA 01 Mandatory

Public

Core Assessed

PRI 2

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

LEA 01.1

Indicate whether your organisation has a formal engagement policy.

Yes

LEA 01.2

Indicate what your engagement policy covers:

- ☐ Conflicts of interest
- ☐ Prioritisation of engagements
- □ Transparency
- ☑ Environmental factors
- ✓ Social factors
- ☑ Governance factors
- ☑ Engagements following on from decisions
- ☐ Other, describe
- ☐ None of the above

LEA 01.4

Provide a brief overview of your organization's approach to engagement

According to our current policy we engage with companies which are associated to violations in norm-based screening. Furthermore, we conduct actively discussions with company management on their ESG issues and policies.

 \bigcirc No

LEA 02 Mandatory

Public

Gateway

PRI 1,2,3

LEA 02.1

Indicate the method of engagement, giving reasons for the interaction.



Type of engagement	Reason for interaction
Individual/Internal staff	☑ To influence corporate practice (or identify the need to influence) on ESG issues
engagements	☑ To encourage improved/increased ESG disclosure
	☐ Other, specify
	☐ We do not engage via internal staff
Collaborative engagements	☐ To influence corporate practice (or identify the need to influence) on ESG issues
	☐ To encourage improved/inreased ESG disclosure
	☐ Other, specify
	☑ We do not engage via collaborative engagements
Service provider engagements	☐ To influence corporate practice (or identify the need to influence) on ESG issues
	☐ To encourage improved/increased ESG disclosure
	☐ Other, specify
	☑ We do not engage via service providers

Process

Process for engagements run internally

LEA 03 Mandatory Public Core Assessed PRI 2

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

LEA 03.1

Indicate whether your organisation has a formal process for identifying and prioritising engagement activities carried out by internal staff.

Yes



	LEA 03.2	Describe the criteria internal staff.	used to identify and	I prioritise engagement activities	carried out by
		aphy/market of the compa	inies targeted		
		ality of ESG factors			
	☐ Systen	nic risks to global portfolio	S		
		ure (holdings)			
	✓ In read	ction to ESG impacts whic	h has already taker	n place	
	☑ As a re	esponse to divestment pre	essure		
	☐ As a fo	ollow-up from a voting dec	ision		
	☐ Client	request			
	☐ Other,	describe			
(○ No				
	Mandatory	,	Public	Core Assessed	PRI 2
	EA 04.1	Indicate if you define spec	cific objectives for y	our engagement activities.	
	Yes				
	○ Yes	, for all engagement activi	ties		
		, for the majority of engag			
		, for a minority of engager			
				activities carried out by internal s	taff.
ı	EA 04.2	Indicate if you monitor the	actions that compa	anies take following your engage	ements.
	Yes				
	○ Yes	, in all cases			
	Yes	, in the majority of cases			
	○ Yes	, in the minority of cases			
	O We do no internal staf		companies take fol	llowing engagement activities ca	rried out by
L		Indicate whether your org carried out by internal stat		nilestones and goals for engagen	nent activities
(○ Yes				
(No				

Portfolio managers have met around 260 companies/management during the reporting year. In most of the meetings ESG issues have been raised and disussed, topics depending partly on the sector.



General processes for all three groups of engagers

LEA 10 Mandatory Public Gateway PRI 2

LEA 10.1

Indicate if you track the number of engagements your organisation participates in.

Type of engagement	Tracking engagements
Individual / Internal staff engagements	Yes, we track the number of our engagements in fullYes, we partially track the number of our engagements
	○ We do not track

Communication

LEA 16 Mandatory Public Core Assessed PRI 2,6

LEA 16.1

Indicate whether your organisation proactively discloses information on its engagements.

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

(Proxy) voting and shareholder resolutions

Overview

LEA 17 Mandatory Public Gateway PRI 1,2,3

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

LEA 17.1

Indicate whether your organisation has a formal voting policy.

Yes



LEA 17.2	Indicate what your voting policy covers:
☐ Conflicts	of interest
☐ Prioritisat	tion of voting activities
☐ Transpar	ency
☑ Decision	making processes
☐ Environm	nental factors
☐ Social fac	ctors
	nce factors
☐ Filing/co-	filing resolutions
□ Extraordi	nary meetings
☐ Share blo	ocking
☐ Regional	voting practices
☐ Record k	eeping
☐ Company	dialogue pre/post vote
□ Securities	s lending process
\square Other, de	escribe
☐ None of t	he above

Provide a brief overview of your organization's approach to (proxy) voting.

Keva acts as a porfolio investor in companies it has invested in. Our vote is casted in AGMs/EGM if and when there is a resolution at the agenda which is of the intrest of Keva as a shareholder and can reduce the value of the investment. The authorzation for voting is granted by the CIO, Investments.

LEA 17.5

LEA 17.4

Provide an overview of how you ensure your voting policy is adhered to, giving details of your approach when exceptions to the policy are made (if applicable).

Decisions to vote are made case by case in the judgement of the responsible portfolio manager.

 \bigcirc No

	Proce	ess				
LEA 18		Manda	atory	Public	Descriptive	PRI 2
	LEA	18.1	Indicate how you typically make y	your (proxy) voting	decisions.	
			Approach			

• We use our own research or voting team and make voting decisions without the use of service providers.



	Based on			
•	our own voting policy			
0	our clients' requests or polic	cy .		
0	other, explain			
	ire service provider(s) that r ng decisions.	nake voting recommendati	ions or provide research that	t we use to ir
	ire service provider(s) that ros for which we review and r		our behalf, except for some p	re-defined
○ We h	ire service provider(s) that r	make voting decisions on o	our behalf.	
Mar	datory	Public	Core Assessed	PR
LEA 22.1	Indicate whether you or companies ahead of vo		ng on your behalf raise any o	concerns wit
O Yes, in	most cases			
Someti	mes, in the following cases:			
□Vo	tes for selected markets			
□Vo	tes relating to certain ESG i	issues		
✓Vo	tes for significant sharehold	lings		
✓Vo	tes for companies we are en	ngaging with		
□ O ₁	request by clients			
□ Ot	ner			
O Neither	we nor our service provider	raise concerns with compa	anies ahead of voting	
LEA 22.2			s) acting on your behalf, com e against management reco	
○ Yes, in	most cases			
Someti	mes, in the following cases.			
$\Box \lor c$	tes in selected markets			
	tes on certain issues			
□Vo	tes for significant sharehold	lings		
□ Vo		-		
□ Vo ☑ Vo	tes for significant sharehold	-		
□ Vo ☑ Vo	tes for significant sharehold tes for companies we are en request by clients	-		
□ Vo ☑ Vo □ Or	tes for significant sharehold tes for companies we are en request by clients	ngaging with		

Outputs and outcomes



LEA 23	Mand	atory	Public	Core Assessed	PRI 2			
	LEA 23.1	For listed equities where you and voting instructions, indicate the p		ovider have the mandate to issue cast during the reporting year.	(proxy)			
		ack or collect this information						
		Votes cast (to the nearest 19	%)					
		%						
	0							
	Specify the basis on which this percentage is calculated							
	 of the total number of ballot items on which you could have issued instructions of the total number of company meetings at which you could have voted of the total value of your listed equity holdings on which you could have voted 							
	LEA 23	Explain your reason(s) for n	ot voting certain ho	ldings				
	 Shares were blocked Notice, ballots or materials not received in time Missed deadline Geographical restrictions (non-home market) Cost Conflicts of interest Holdings deemed too small Administrative impediments (e.g., power of attorney requirements, ineligibility due to participation in share placement) We do not vote on environmental resolutions We do not vote on social resolutions On request by clients Other In the reporting year we did not identfy any cases where we judged to vote We do not track or collect this information 							
LEA 24	Mand	atory	Public	Additional Assessed	PRI 2			
	LEA 24.1	have issued.	structions that you	and/or your service provider on yo	our behalf			
	O Yes, we t	rack this information						



No, we do not track this information

LEA 24.4

Additional information. [Optional

In the reporting year we did not identfy any cases where we judged to vote

Communication

LEA 27 Mandatory Public Core Assessed PRI 2,6

LEA 27.1

Indicate if your organisation proactively discloses information on your voting activities.

- We disclose it publicly
- O We disclose it to clients/beneficiaries only
- We do not proactively disclose our voting activities to the public and/or to clients/beneficiaries

Keva

Reported Information

Public version

Direct - Fixed Income

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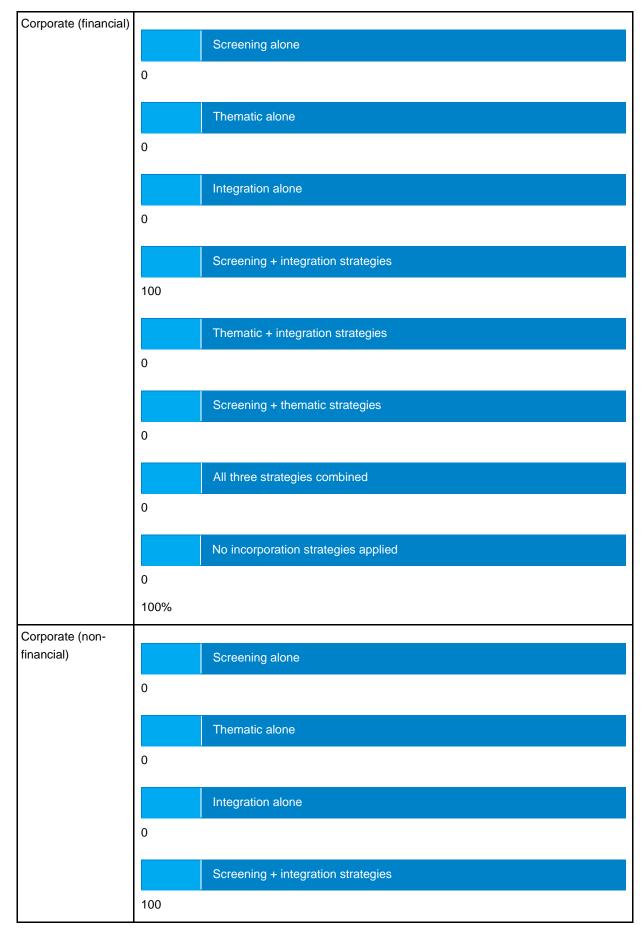
ESG incorporation in actively managed fixed income

Implementation processes

FI 04	Mandatory	Public	Gateway	PRI 1

FI 04.1

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.



Thematic + integration strategies
0
Screening + thematic strategies
0
All three strategies combined
0
No incorporation strategies applied
0 100%

Describe your reasons for choosing a particular ESG incorporation strategy and how combinations of strategies are used.

Corporate credit portfolios are screened twice a year by an external serivice provider for norm-based violations. Furthermore, ESG issues are integrated to our investment process in selecting securities and the quality of the company is evaluated also regarding the ESG issues.

N	Mandatory	Public	Additional Assessed	PRI 1	
FI 06.1	Indicate how you ensure that y	our ESG research pr	ocess is robust:		
☑ Issu	ers are given the opportunity by you or inaccuracies			em and	
$\hfill \square$ Issuer information and/or ESG ratings are updated regularly to ensure ESG research is accurate					
☐ Internal audits of ESG research are undertaken in a systematic way					
☐ ESG analysis is benchmarked for quality against other providers					
☐ Other, specify					
□ Non	e of the above				
FI 06.2	Describe how your ESG inform	ation or analysis is s	hared among your investment tea	am.	
☑ ESG	G information is held within a centralise	d database and is ac	cessible to all investment staff		
□ ESG docum	G information is a standard item on all in ents	ndividual issuer sumr	maries, 'tear sheets', 'dashboards	s' or similar	
	stment staff are required to discuss ES ttee meetings	G information on iss	uers as a standard item during in	vestment	
□ Rec	ords capture how ESG information and	research was incorp	porated into investment decisions		
□ Othe	er, specify				
□ Non	e of the above				



(A) Implementation: Screening FI 07 Mandatory Public Gateway PRI 1 FI 07.1 Indicate the type of screening you conduct.

Select all that apply

	Corporate (financial)	Corporate (non-financial)	
	\checkmark	\checkmark	
Negative/exclusionary screening			
Positive/best-in-class screening			
	\checkmark	\checkmark	
Norms-based screening			

FI 07.2 Describe your approach to screening for internally managed active fixed income

Portfolios are screend twice a year for norm-based violations. If the company is associated to violations, further investments are not done, the company is contacted for engagement, and if there is no progress made by the company, investments are sold and the company excluded.

Corporate (financial)

Corporate (fin)

For legal reasons

Corporate (non-financial)

Corporate (non-financial)

Portfolios are screened twice a year for norm-based criteria. We screen for violations for UN Global Compact, OECD Guidelines for Multinational Enterprises and unhuman weapons. Companies with confirmed violations are excluded from the investment universe.

Describe your approach to ESG-based negative screening of issuers from your investable



FI 08.2

☑ For non-legal reasons

universe.

FI 10 Mandatory Public Core Assessed PRI 1

FI 10.1

Indicate which systems your organisation has to ensure that fund screening criteria are not breached in fixed income investments.

Type of screening	Checks
	☑ Checks are performed to ensure that issuers meet screening criteria
Negative/exclusionary screening	☑ Data used for the screening criteria is updated at least every 2 years
3	☐ Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria
	☐ Audits of fund holdings are undertaken regularly by internal audit or compliance functions
	☐ Other, specify
	☐ None of the above
	☑ Checks are performed to ensure that issuers meet screening criteria
Norms-based screening	☑ Data used for the screening criteria is updated at least every 2 years
	☐ Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria
	☐ Audits of fund holdings are undertaken regularly by internal audit or compliance functions
	☐ Other, specify
	☐ None of the above

(C) Implementation: Integration

FI 14	Mandatory	Public	Descriptive	PRI 1
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FI 14.1

Describe your approach to integrating ESG into traditional financial analysis.

We systematically review any potential ESG issues as part of general quality criteria in each company/issuer and evaluate their significance. In review and evaluation we use sell-side reseach, company web-pages and ESG research provided by an external service provider.

Corporate (financial)

ESG issues are reviewed as a part of the general quality criteria for both financial and other corporates; the significance of E, S and G factors may differ by industrial or financial sector which is taken into account accordingly.



Corporate (non-financial)

ESG issues are reviewed as part of the general quality criteria for both financial and other corporates; the significance of E, S and G factors may differ by industry or finacial sector which is taken into account accordingly

FI 15		Mand	atory	Public	Core Assessed	PRI 1
	FI 1	5.1	Indicate how ESG information is	typically used as pa	art of your investment process.	

Select all that apply

	Corporate (financial)	Corporate (non- financial)	
ESG analysis is integrated into fundamental analysis	\checkmark	V	
ESG analysis is integrated into security weighting decisions			
ESG analysis is integrated into portfolio construction decisions			
ESG analysis is a standard part of internal credit ratings or assessment			
ESG analysis for issuers is a standard agenda item at investment committee meetings			
ESG analysis is regularly featured in internal research notes or similar			
ESG analysis is a standard feature of ongoing portfolio monitoring	\square	☑	
ESG analysis features in all internal issuer summaries or similar documents			
Other, specify			

FI 16	Mand	atory	Public	Additional Assessed	PRI 1
FI ·	16.1	Indicate the extent to which ESG	issues are reviewe	ed in your integration process.	



	Environment	Social	Governance	
Corporate (financial)	EnvironmentalSystematicallyOccasionally	Social Systematically Occasionally	Governance Systematically Occasionally	
	O Not at all	O Not at all	O Not at all	
Corporate (non- financial)	EnvironmentalSystematicallyOccasionallyNot at all	Social Systematically Coccasionally Not at all	Governance Systematically Occasionally Not at all	

Corporate (financial)

In priciple, all the companies/issuers are analysed and evaluted in regard to E, S and G factors. These factors and the management of ESG issues are considered as part of quality criteria when analysing and evaluating companies/issuers. The significance of E, S and G factors may vary between different sector and these are evalued accordingly. Sell-side research is widely used, as well as specific ESG research, company pages and other available information

Corporate (non-financial)

In principle, all the companies/issuers are analysed and evaluated in regard to E, S and G factors. These factors and the management of ESG issues are considered as part of quality criteria when analysing and evaluating companies/issuers. The significance of E, S and G factors may vary between different sectors and these are evalued accordingly. Sell-side research is widely used as well as specific ESG research, company pages and other available information.

	Comi	nunic	ation			
FI 23		Mar	ndatory	Public	Core Assessed	PRI 2,6
	EL 22.4		Indicate if your organisation proacti	vely discloses i	information on your approach to	RI across all of

O We disclose it publicly

FI 23.1

O We disclose it to clients and/or beneficiaries only

your fixed income investments.

● We do not proactively disclose it to the public and/or clients/beneficiaries



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Overview

PR 04 Mandatory Public Core Assessed PRI 1-6

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

PR 04.1

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

O Yes

No

PR 04.3

Provide a brief overview of your organisation's approach to responsible investment in property, and how you link responsible investment in property to your business strategy.

We have an Environmental Strategy applied to our Direct Real Estate investments. It sets the guidelines on how we manage our assets and has target consumption levels set.

Pre-investment (selection)

PR 07 Mandatory Public Gateway/Core Assessed PRI 1

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

PR 07.1

Indicate if your organisation typically incorporates ESG issues when selecting property investments.

Yes

PR 07.2

Provide a description of your organisation's approach to incorporating ESG issues in property investment selection.

ESG issues are studied in the selection process by carefully investigating how the asset was or will be built, how it will be managed and what are the technical and environmental risks involved. Usually we make further reports in the due diligence -process about the environmental and energy issues by using outside consultants.

 \bigcirc No

PR 07.3

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

ESG issues

☑ Environmental



	List up to three typical examples per E, S and G issue		
☐ Climate	change adaptation		
□ Contami	□ Contamination		
☐ Energy €	efficiency		
☐ Energy s	supply		
☐ Flooding			
☐ GHG em	☐ GHG emissions		
☐ Indoor e	☐ Indoor environmental quality		
☑ Natural h	nazards		
☐ Resiliend	ce		
□ Transpo	rtation		
☐ Water ef	ficiency		
☐ Waste m	nanagement		
☐ Water su	upply		
☐ Other			
☐ Other			
	Description [OPTIONAL]		
Natural hazar	ds are typically always assessed in the EDD (Environmental Due-Diligence process)		
	List up to three typical examples per E. S. and G. issue		
	List up to three typical examples per E, S and G issue		
	change adaptation		
☑ Contami	change adaptation nation		
☑ Contami	change adaptation nation efficiency		
☑ Contami ☐ Energy € ☐ Energy s	change adaptation nation efficiency supply		
☑ Contami ☐ Energy € ☐ Energy € ☐ Flooding	change adaptation nation efficiency supply		
☑ Contami☐ Energy e☐ Energy s☐ Flooding☐ GHG em	change adaptation nation efficiency supply nissions		
☐ Contami ☐ Energy 6 ☐ Energy 8 ☐ Flooding ☐ GHG em ☐ Indoor e	change adaptation nation efficiency supply nissions nvironmental quality		
☐ Contami ☐ Energy 6 ☐ Energy 8 ☐ Flooding ☐ GHG em ☐ Indoor e	change adaptation nation efficiency supply nissions nvironmental quality		
☐ Contami ☐ Energy s ☐ Energy s ☐ Flooding ☐ GHG em ☐ Indoor e ☐ Natural h ☐ Resilience	change adaptation nation efficiency supply nissions nvironmental quality nazards ce		
☐ Contami ☐ Energy 6 ☐ Energy 8 ☐ Flooding ☐ GHG em ☐ Indoor e ☐ Natural 8 ☐ Resiliend ☐ Transpo	change adaptation nation efficiency supply inissions nvironmental quality nazards ce rtation		
☐ Contami ☐ Energy e ☐ Energy e ☐ Flooding ☐ GHG em ☐ Indoor e ☐ Natural h ☐ Resiliend ☐ Transpo ☐ Water ef	change adaptation nation efficiency supply nissions nvironmental quality nazards ce rtation efficiency		
☐ Contami ☐ Energy e ☐ Energy e ☐ Flooding ☐ GHG em ☐ Indoor e ☐ Natural h ☐ Resiliend ☐ Transpo ☐ Water ef ☐ Waste m	change adaptation nation efficiency supply nissions nvironmental quality nazards ce rtation efficiency nanagement		
☐ Contami ☐ Energy e ☐ Energy e ☐ Flooding ☐ GHG em ☐ Indoor e ☐ Natural h ☐ Resiliend ☐ Transpo ☐ Water ef	change adaptation nation efficiency supply nissions nvironmental quality nazards ce rtation efficiency nanagement		
☐ Contami ☐ Energy e ☐ Energy e ☐ Flooding ☐ GHG em ☐ Indoor e ☐ Natural t ☐ Resilienc ☐ Transpo ☐ Water ef ☐ Waste m ☐ Water su	change adaptation nation efficiency supply nissions nvironmental quality nazards ce rtation efficiency nanagement		
☐ Contami ☐ Energy e ☐ Energy e ☐ Flooding ☐ GHG em ☐ Indoor e ☐ Natural h ☐ Resiliend ☐ Transpo ☐ Water ef ☐ Waste m ☐ Water su ☐ Other	change adaptation nation efficiency supply nissions nvironmental quality nazards ce rtation efficiency nanagement		

Soil contamination is sometimes assessed in the EDD process as well.



	List up to three typical examples per E, S and G issue
☐ Clima	te change adaptation
☐ Conta	mination
☑ Energ	y efficiency
☐ Energ	y supply
☐ Floodi	ng
☐ GHG	emissions
☐ Indoo	r environmental quality
☐ Natura	al hazards
☐ Resilie	ence
☐ Trans	portation
□ Water	efficiency
□ Waste	management
□ Water	supply
☐ Other	
☐ Other	
	Description [OPTIONAL]
Energy effic	Description [OPTIONAL] ciency issues are considered in the analysis phase always.
Energy effic	
	ciency issues are considered in the analysis phase always.
☑ Social	ciency issues are considered in the analysis phase always.
☑ Social ☑ Buildin	ciency issues are considered in the analysis phase always. List up to three typical examples per E, S and G issue
☑ Social ☑ Buildin ☐ Health	List up to three typical examples per E, S and G issue
☑ Social ☑ Buildin ☐ Health	List up to three typical examples per E, S and G issue ng safety and materials n, safety and wellbeing economic
✓ Social ✓ Buildin ☐ Health ☐ Socio- ☐ Acces	List up to three typical examples per E, S and G issue ng safety and materials n, safety and wellbeing economic
✓ Social ✓ Buildin ☐ Health ☐ Socion ☐ Acces	List up to three typical examples per E, S and G issue ng safety and materials n, safety and wellbeing economic sibility
✓ Social ✓ Buildin ☐ Health ☐ Socion ☐ Acces	List up to three typical examples per E, S and G issue ng safety and materials n, safety and wellbeing reconomic sibility able Housing
✓ Social ✓ Buildin ☐ Health ☐ Sociol ☐ Acces ☐ Afford ☐ Occup	List up to three typical examples per E, S and G issue ng safety and materials n, safety and wellbeing reconomic sibility able Housing
✓ Social ✓ Buildin ☐ Health ☐ Socio- ☐ Acces ☐ Afford ☐ Occup ☐ Other	List up to three typical examples per E, S and G issue ng safety and materials n, safety and wellbeing reconomic sibility able Housing
✓ Social ✓ Buildin ☐ Health ☐ Sociol ☐ Accest ☐ Afford ☐ Occupt ☐ Other	List up to three typical examples per E, S and G issue ng safety and materials n, safety and wellbeing neconomic sibility able Housing pier Satisfaction
✓ Social ✓ Buildin ☐ Health ☐ Sociol ☐ Accest ☐ Afford ☐ Occupt ☐ Other	List up to three typical examples per E, S and G issue ng safety and materials n, safety and wellbeing reconomic sibility able Housing

Building safety and materials are always important part of the process and especially taken into consideration in new development.



	Building safety and materials			
□⊢	lealth, Safety and wellbeing			
	Socio-economic			
	accessibility			
	ffordable Housing			
	Occupier Satisfaction			
	Other			
	Other			
	Other			
	List up to three typical examp	oles per E, S and	d G issue	
	Building safety and materials			
	Health, Safety and wellbeing			
	Socio-economic			
	Accessibility			
	Affordable Housing			
	Occupier Satisfaction			
	Other			
	Other			
	Other			
☐ Gover				
□ Gover	nance			
Vo	luntary	Public	Additional Assessed	PRI 1,3
ew selectio	n options have been added to this ir			
PR 08.1	Indicate what type of ESG informati investment selection process.	ion your organis	ation typically considers during your	r property
☑ Raw data	a from the target property asset/compa	ny		
☑ Appraisa	ıls/audits			
☑ Benchma	arks/ratings against similar property as:	set		
☑ Country	level data/benchmarks			
☑ Data alig	ned with established property reporting	g standards, ind	ustry codes and certifications	
✓ Internation	onal initiatives, declarations or standard	ds		
☑ Data fror	m engagements with stakeholders (e.g.	tenants and loc	cal community surveys)	
	on from external advisers			

List up to three typical examples per E, S and G issue



 $\hfill\square$ Other, specify

 $\hfill\square$ We do not track this information PR 08.2

Provide a brief description of how this ESG information was incorporated into your investment selection process.

We have a lot of latest information and analysis about the property investment market which we use as the basis of our property investment selection process.

PR 09 **Mandatory Public Core Assessed** PRI 1 New selection options have been added to this indicator. Please review your prefilled responses carefully. Indicate if ESG issues impacted your property investment selection process during the reporting PR 09.1 ☑ ESG issues helped identify risks and/or opportunities for value creation ☑ ESG issues led to the abandonment of potential investments ☑ ESG issues impacted the investment in terms of price offered and/or paid ☑ ESG issues impacted the terms in the shareholder/purchase agreements and/or lending covenants ☐ ESG issues were considered but did not have an impact on the investment selection process ☐ Other, specify ☐ Not applicable, our organisation did not select any investments in the reporting year ☐ We do not track this potential impact Indicate how ESG issues impacted your property investment deal structuring processes during the PR 09.2 ☑ ESG issues impacted the investment in terms of price offered and/or paid ☑ ESG issues impacted the terms in the shareholder/purchase agreements and/or lending covenants ☐ ESG issues were considered but did not have an impact on the deal structuring process ☐ Other, specify ☐ Not applicable, our organisation did not select any investments in the reporting year \square We do not track this potential impact Selection, appointment and monitoring third-party property managers PRI 4 **PR 10 Mandatory Public Core Assessed** New selection options have been added to this indicator. Please review your prefilled responses carefully.

Yes

PR 10.1



of third-party property managers.

Indicate if your organisation includes ESG issues in your selection, appointment and/or monitoring

PR 10.2

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

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

		Types of actions
	☑ Request processes	explanation of how ESG is effectively integrated, including inquiries about governance and
		track records and examples of how the manager implements ESG in their asset and anagement
	☐ Discuss	property level out-performance opportunities through greater integration of ESG criteria
	☐ Request	explanation of engaging stakeholders on ESG issues
	\square Other, e	xplain
		Coverage
	• 75-100%	6
	○ 50-75%	
	O 25 – 50°	%
	○ 0 - 25%	
☑ Co	ontractual re	equirements when appointing property managers includes ESG issues
		Types of actions
	☑ Include	clear and detailed expectations for incorporating ESG
	☐ Require	dedicated ESG procedures in all relevant asset and property management phases
	☐ Clear ES	SG reporting requirements
	☐ Clear ES	SG performance targets
	□ Other, e	xplain
		Coverage
		6
	○ 50-75%	
	O 25 – 509	%
	○ 0 - 25%	



 $\ensuremath{\square}$ Monitoring of property managers covers ESG responsibilities and implementation

		Types of actions
	✓ Performatimeframe.	ance against quantitative and material environmental / resource targets over specified
	☐ Performation Performation	ance against quantitative and material environmental / resource targets against relevant
	☐ Performation Portfolio/inv	ance against quantitative and qualitative targets to address social impacts of the vestment,
	☐ Other, e	xplain
		Coverage
	• 75-100%	6
	○ 50-75%	
	O 25 – 50%	%
	○ 0 – 25%	
No		
10.3	party p	e a brief description of your organisations selection, appointment and monitoring of third property managers and how they contribute to the management of ESG issues for your try investments.

Third party managers have contractual duties to fulfill certain requirements involving energy efficiency, repairs and construction and also how to manage their own company.

Post-investment (monitoring and active ownership)

Overview
PR 11 Mandatory Public Gateway PRI 2

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

PR 11.1

Indicate if your organisation, and/or property managers, considers ESG issues in post-investment activities relating to your property assets.

Yes



PR 11.2

Indicate whether your organisation, and/or property managers, considers ESG issues in the following post-investment activities relating to your property assets.

- ☑ We consider ESG issues in property monitoring and management
- ☑ We consider ESG issues in property developments and major renovations.
- ☑ We consider ESG issues in property occupier engagements
- ☑ We consider ESG issues in community engagements related to our properties
- ☐ We consider ESG issues in other post-investment activities, specify

PR 11.3

Describe how your organisation, and/or property managers, considers ESG issues in post-investment activities related to your property assets.

For example in energy-efficiency investment decisions, we lock a certain starting point/level and follow the progress how the investment has been performing and fullfilling the prognosed level.

 \bigcirc No

Property monitoring and management

PR 12 Mandatory

Public

Core Assessed

PRI 2,3

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

PR 12.1

Indicate the proportion of property assets for which your organisation, and/or property managers, set and monitored ESG targets (KPIs or similar) during the reporting year.

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

(in terms of number of property assets)

PR 12.2

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

☑ Environmental

Target/KPI	Progress Achieved
Energy efficiency	Target for energy cost savings for the years 2016-2020 is 7 % (from 2014 level).
Water consumption	Target for water consumption reduction for the years 2016-2020 is 10 % (from 2014 level).

☐ Governance

☐ We do not set and/or monitor against targets



Property developments and major renovations

PR 14 Mandatory Public Core Assessed PRI 2

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

issues have been considered.

- >90% of active developments and major renovations51-90% of active developments and major renovations
- 10-50% of active developments and major renovations
- O <10% of active developments and major renovations</p>
- O N/A, no developments and major renovations of property assets are active

(by number of active property developments and refurbishments)

PR 14.2

PR 14.1

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

Indicate the proportion of active property developments and major renovations where ESG

- ☑ Environmental site selection requirements
- ☑ Environmental site development requirements
- ☑ Sustainable construction materials
- ☑ Water efficiency requirements
- ☑ Energy efficiency requirements
- ☐ Energy generation from on-site renewable sources
- ☑ Waste management plans at sites
- ☑ Health and safety management systems at sites
- ☑ Construction contractors comply with sustainability guidelines
- ☐ Resilient building design and orientation
- ☐ Other, specify

Occupier engagement

PR 15 Mandatory Public Core Assessed PRI 2

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



PR 15.1

Indicate the proportion of property occupiers your organisation, and/or your property managers, engaged with on ESG issues during the reporting year.

● >90% of occupiers

○ 51-90% of occupiers

○ 10-50% of occupiers

○ <10% of occupiers

(in terms of number of occupiers)

PR 15.2

Indicate if the following practises and areas are typically part of your, and/or your property managers', occupier engagements.

☐ Distribute a sustainability guide to occupiers

☑ Organise occupier events focused on increasing sustainability awareness

☐ Deliver training on energy and water efficiency

☐ Deliver training on waste minimisation

☑ Provide feedback on energy and water consumption and/or waste generation

☐ Provide feedback on waste generation

☑ Carry out occupier satisfaction surveys

☐ Offer green leases

☐ Other, specify

PR 15.3

Additional information. [Optional]

In our customer/occupier satisfaction process we engage occupiers to notify any issue (incl. ESG issues) they might have regarding the property asset.

Outputs and outcomes

PR 18

Voluntary

Public

Additional Assessed

PRI 1,2

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

PR 18.1

Indicate whether your organisation measures how your approach to responsible investment in property investments has affected financial and/or ESG performance.

☑ We measure whether our approach to ESG issues impacts funds' financial performance



Describe the impact on:	Impact
Fundal financial newformance	Positive
Funds' financial performance	○ Negative
	○ No impact

☑ We measure whether our approach to ESG issues impacts funds' ESG performance

Describe the impact on:	Impact
	Positive
Funds' ESG performance	○ Negative
	○ No impact

□ None of the above

Communication

PR 20 Mandatory Public Core Assessed PRI 6

PR 20.1

Indicate if your organisation proactively discloses ESG information on your property investments.

- O Disclose publicly
- O Disclose to clients/beneficiaries only
- No proactive disclosure to the public or to clients/beneficiaries

