



ASSESSMENT REPORT 2020

ESG Portfolio Management



INTRODUCTION

The Assessment report is designed to provide feedback to signatories to support ongoing learning and development.

A brief description of the each section of this report and how it should be interpreted is provided below. The high-level assessment methodology can be found here and a companion document explaining the assessment of each indicator can be found here

ORGANISATIONAL OVERVIEW

This section provides an overview of the main characteristics of your organisation. This determined which modules and indicators you reported on and determines your peer groups.

SUMMARY SCORECARD

This section provides an overview of your aggregate score for each module and the median score. These bands range from 'A+' (top band) to 'E' (lowest band).

ASSESSMENT BY MODULE

For each module you reported on, you will see a section that shows your:

- Year-on-year performance
- Indicator scorecard
- Section scores
- Comparison to peer groups

PUBLISHING IN THE DATA PORTAL

YEAR ON YEAR PERFORMANCE

These charts show the trend in your module band over the last three years, and also shows the trend across the average of all reporting signatories.

INDICATOR SCORECARD

Your indicator scorecard summarises the scores you achieved for each assessed indicator within each module.

These will range from zero stars to three stars. It also provides basic information about the performance of your organisation compared with other signatories that responded to that indicator. The number of stars determines your overall module score. Please refer to the assessment methodology summary for additional information about how these scores are calculated.

PEER COMPARISON

Your total aggregated performance band for each module will be compared against your peer groups in a series of distribution charts.

Assessment Reports and private Transparency Reports are confidential and only accessible to the reporting signatory on the Data Portal.

However, the Data Portal does facilitate signatories to share these reports bilaterally with other signatories.

To request access, use the "Find A Report" tab to search, and click "Request access". To check pending requests on your own reports, go to "Settings and Requests" tab. Your nominated Data Portal Contact can approve or decline requests.

PUBLICATION GUIDELINES

It is permitted to publish your Assessment Report outside of the Data Portal, however you must take every care not to represent scores out of context, and include access to or references to: the PRI assessment methodology; your full Assessment Report (if only a section is published); and your Transparency Report.

Assessment Reports are the intellectual property of PRI. Under no circumstances, can this report or any of its contents be sold to third parties. In addition, you are not allowed to share this report with third parties unless you have been given consent by the signatory in question.

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This document is based on information reported directly by signatories. Moreover, the underlying information has not been audited by the PRI or any other party acting on its behalf. While every effort has been made to produce a fair representation of performance, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for damage caused by use of or reliance on the information contained within this report.

Organisational Overview

This section provides an overview of your organisation. These characteristics are used to define your peer groups.

MAIN CHARACTERISTICS			
Name	ESG Portfolio Management		
Signatory Category	Investment Manager		
Signatory Type	Fund management		
Size	US\$ 0 - 0.1 billion AUM		
Signed PRI Initiative	2018		
Region	Europe		
Country	Germany		
Disclosure of Voluntary Indicators	87% from 39 Voluntary indicators		

YOUR ORGANISATION'S ASSETS UNDER MANAGEMENT (AUM)†				
Asset Class	Internally Managed	Externally Managed		
Listed equity	<10%	0		
Fixed income	>50%	0		
Private equity	0	0		
Property	0	0		
Infrastructure	0	0		
Commodities	<10%	0		
Hedge funds	0	0		
Fund of hedge funds	0	0		
Forestry	0	0		
Farmland	0	0		
Inclusive finance	0	0		
Cash	<10%	0		
Money market instruments	t instruments 0			
Other 1	0	<10%		
Other 2	0	0		

 \dagger Asset classes were aggregated to four ranges: 0%; <10%; 10-50% and >50%

Summary Scorecard

AUM	Module Name	Your Score	Your Median Score Score
	01.Strategy & Governance	А	A
Direct & Active	Ownership Modules		
<10%	10. Listed Equity - Incorporation	A+	A
<10%	11. Listed Equity - Active Ownership	А	B
<10%	12. Fixed Income - SSA	A+	B
10-50%	13. Fixed Income - Corporate Financial	А	B
>50%	14. Fixed Income - Corporate Non-Financial	A+	B
<10%	15. Fixed Income - Securitised	А	B

Strategy And Governance

Indicator Scorecard

Module	Strategy and Governance
Total Score	28 ★ (out of a maximum 30 ★ from 10 indicators). Your score includes 3 additionally assessed indicators and the additional part of your score was calculated from SG 08.a, SG 08.b, SG 11.
Band	Α

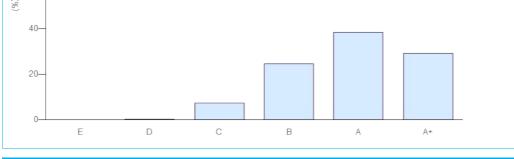
SECTION			INDICATOR	MEDIAN	YOUR	CHANGE AGAINST
SECTION	NUMBER	TYPE	ТОРІС	PEER SCORE (# PEERS)	SCORE	LAST YEAR
	SG 01	CORE	RI Policy and coverage	★★★ (2127)	***	-
RI Policy	SG 02	CORE	Publicly available RI policy or guidance documents	★★☆ (2127)	★★☆	_
	SG 03	CORE	Conflicts of interest	★★★ (2127)	***	_
Objective & Strategies	SG 05	CORE	RI goals and objectives	★★★ (2127)	***	-
	SG 07	CORE	RI roles and responsibilities	★★★ (2127)	***	-
Governance & Human Resources	SG 08a	ADDITIONAL	RI in performance management & rewards	★★★ (2127)	***	-
	SG 08b	ADDITIONAL	RI in personal development / training	★★★ (2127)	***	_
	SG 09	CORE	Collaborative organisations / initiatives	★★☆ (2127)	***	_
Promoting RI	SG 10	CORE	Promoting RI independently	★★★ (2127)	***	_
	SG 11	ADDITIONAL	Dialogue with public policy makers or standard setters	★★★ (2127)	***	-
ESG Issues In Asset Allocation	SG 14	ADDITIONAL	Investment risks and opportunity	★★★ (2127)	***	_
Assurance of Responses	CM 01	ADDITIONAL	Assurance, verification, or review	★★☆ (2127)	***	Ø

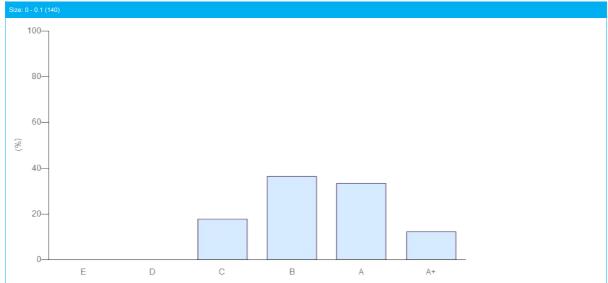
Your Strategy and Governance module score has been compared to relevant peer groups in a series of distribution charts below.



Your Strategy and Governance module score has been compared to relevant peer groups in a series of distribution charts below.

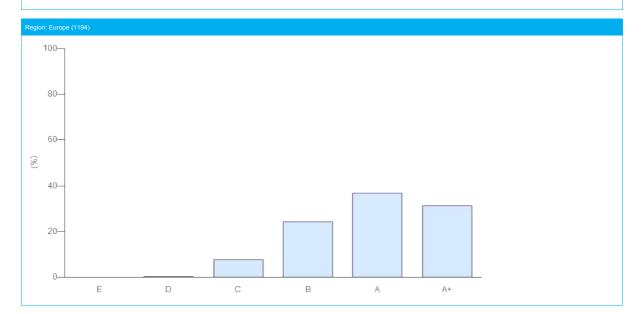
Module	STRATEGY AND GOVERN	IANCE	
Band	Α		
Category: Investment Manager	1677)		
100			
80—			
60—			
(j			





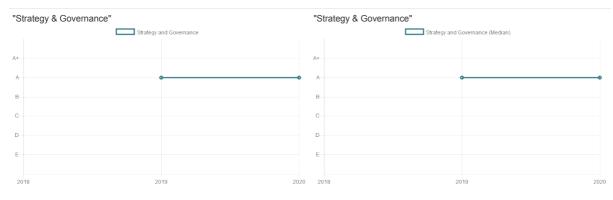
Your Strategy and Governance module score has been compared to relevant peer groups in a series of distribution charts below.

Module	STRATEGY A	ND GOVERNAN	CE				
Band	Α						
Signed PRI: 2018 (356)	·						
100-							
80—							
60—							
<u>R</u>							
40							
20—							
0	[]					_	
E	D	С	В	A	A+		



Your Company Year-On-Year Performance

Average Year-On-Year Trends



DIRECT - LISTED EQUITY - INCORPORATION

MODULE OVERVIEW

The table below provides an overview of your Listed Equity Incorporation Band as well as your scores for Screening and/or Integration strategies. You receive a single score for this module, which is based on your main incorporation strategy, calculated using your reported information in indicator LEI 03. Both the Screening and Integration scores, if applicable, are presented in more detail in the following pages. Thematic approaches are not scored.

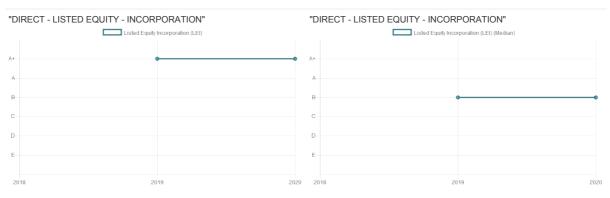
Module Band	A+
Score based on	Screening & Integration
Screening	A+
Integration	A+
Thematic	Not Scored

OVERVIEW OF INCORPORATION STRATEGIES (LEI 03)

ESG INCORPORATION STRATEGY	PERCENTAGE OF ACTIVE LISTED EQUITY TO WHICH THE STRATEGY IS APPLIED (%)
Screening alone	0 %
Thematic alone	0 %
Integration alone	0 %
Screening + integration strategies	0 %
Thematic + integration strategies	0 %
Screening + thematic strategies	0 %
All three strategies combined	100 %
No incorporation strategies applied	0 %

Your Company Year-On-Year Performance

Average Year-On-Year Trends



Direct - LISTED EQUITY - SCREENING

Indicator Scorecard

This module looks at how your organisation applies ESG screening to your internally managed listed equity holdings. If your organisation did not respond to an applicable indicator, you will see a score of $\frac{1}{2}$

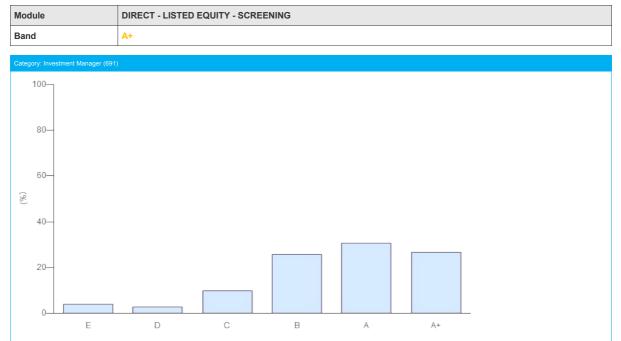
Module	LISTED EQUITY - INCORPORATION
Incorporation Strategy	SCREENING
Total Score	15 ★ (out of a maximum 15 ★ from 5 indicators). Your score includes 2 additionally assessed indicators and the additional part of your score was calculated from LEI 02, LEI 03.
Band	A+

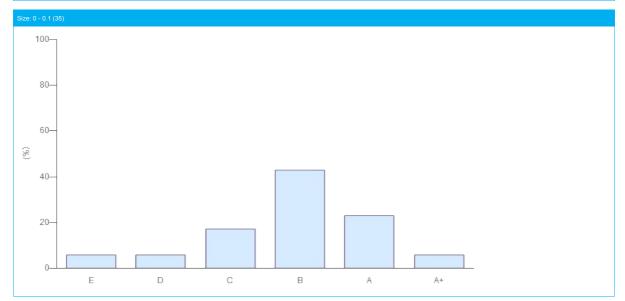
SECTION	INDICATOR			MEDIAN	YOUR	CHANGE AGAINST	
NUM		TYPE	ТОРІС		SCORE	LAST YEAR	
IMPLEMENTATION	LEI 02	ADDITIONAL	Type of ESG information used in investment decision	★★★ (811)	***	_	
PROCESSES		ADDITIONAL	Information from engagement and/or voting used in investment decision-making	★★★ (811)	***	_	
IMPLEMENTATION:		CORE	Processes to ensure screening is based on robust analysis	★★★ (811)	***	_	
SCREENING	LEI 06	ADDITIONAL	Processes to ensure fund criteria are not breached	★★☆ (811)	***	_	
COMMUNICATION	SG 19a	CORE	Disclosure of approach to public	★★☆ (811)	***	_	
CONNONICATION	SG 19b	CORE	Disclosure of approach to clients/beneficiaries	★★☆ (811)	***	_	

Your Direct - Listed Equity - Screening module score has been compared to relevant peer groups in a series of distribution charts below.

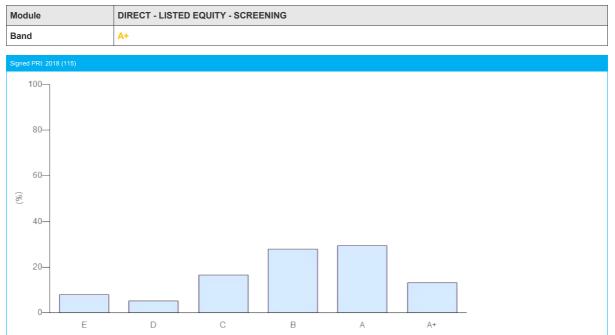


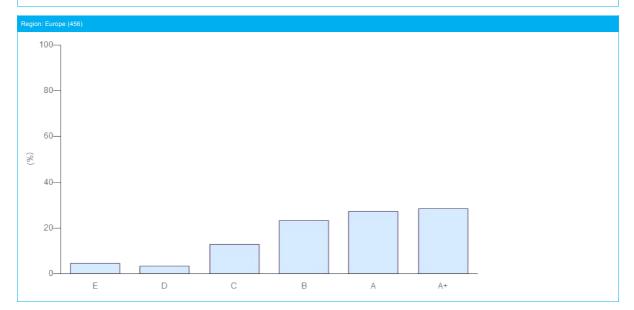
Your Direct - Listed Equity - Screening module score has been compared to relevant peer groups in a series of distribution charts below.





Your Direct - Listed Equity - Screening module score has been compared to relevant peer groups in a series of distribution charts below.





Direct - LISTED EQUITY - INTEGRATION

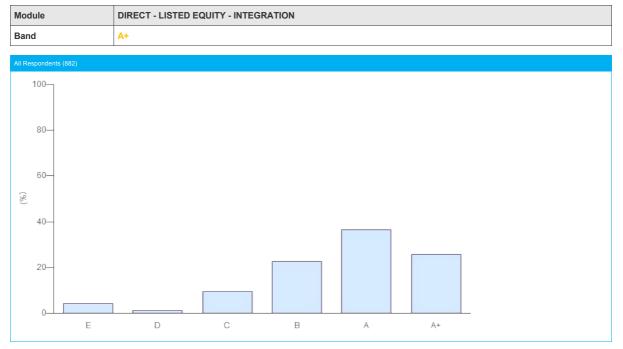
Indicator Scorecard

This module looks at how your organisation integrates ESG issues into investment decision making for your internally managed listed equity holdings. If your organisation did not respond to an applicable indicator, you will see a score of

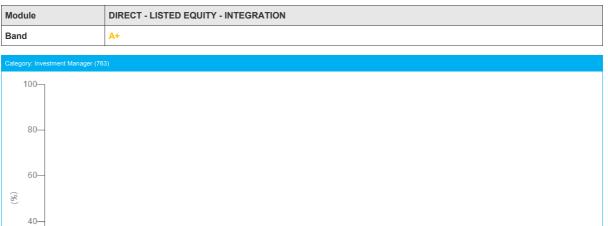
Module	LISTED EQUITY - INCORPORATION
Incorporation Strategy	INTEGRATION
Total Score	21 ★ (out of a maximum 21 ★ from 7 indicators). Your score includes 2 additionally assessed indicators and the additional part of your score was calculated from LEI 02, LEI 03.
Band	A+

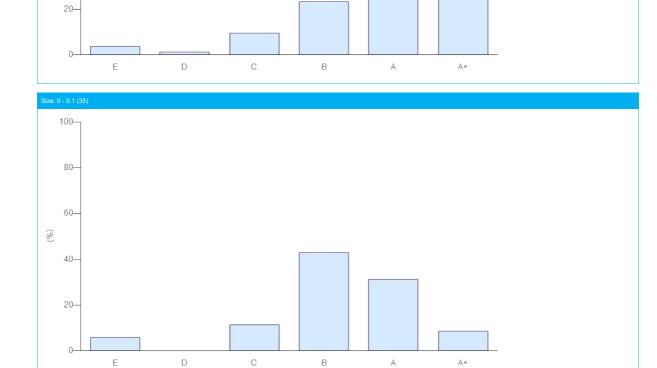
SECTION	INDICATOR			MEDIAN	YOUR	CHANGE AGAINST
SECTION	NUMBER	TYPE	ТОРІС	PEER SCORE (# PEERS)	SCORE	LAST YEAR
IMPLEMENTATION	LEI 02	ADDITIONAL	Type of ESG information used in investment decision	★★★ (882)	***	_
PROCESSES	LEI 03	ADDITIONAL	Information from engagement and/or voting used in investment decision-making	★★★ (882)	***	_
	LEI 08	CORE	Review ESG issues while researching companies/sectors	★★★ (882)	***	_
IMPLEMENTATION: INTEGRATION	LEI 09	CORE	Processes to ensure integration is based on robust analysis	★★★ (882)	***	_
	LEI 10	CORE	Aspects of analysis ESG information is integrated into	★★★ (882)	***	_
COMMUNICATION	SG 19a	CORE	Disclosure of approach to public	★★☆ (882)	***	_
	SG 19b	CORE	Disclosure of approach to clients/beneficiaries	★★☆ (882)	***	_

Your Direct - Listed Equity - Integration module score has been compared to relevant peer groups in a series of distribution charts below.

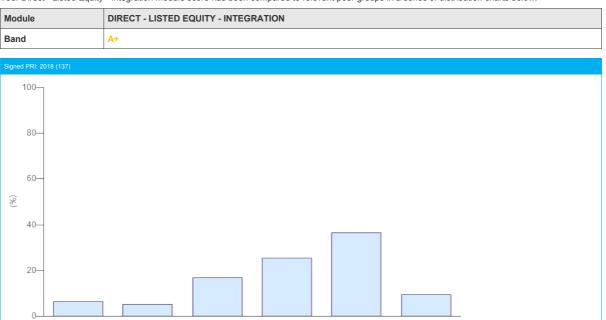


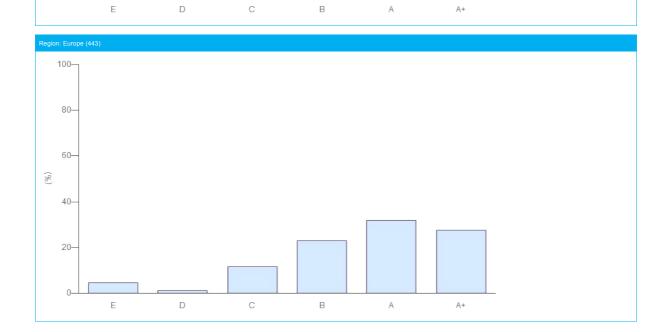
Your Direct - Listed Equity - Integration module score has been compared to relevant peer groups in a series of distribution charts below.





Your Direct - Listed Equity - Integration module score has been compared to relevant peer groups in a series of distribution charts below.





DIRECT - LISTED EQUITY - ACTIVE OWNERSHIP

MODULE OVERVIEW

The table below provides an overview of your Listed Equity Active Ownership Band. This is based on your score for engagement and (proxy) voting.

If applicable, you will see a separate score for engagements run internally, collaboratively and through service providers. Your engagement score is based on your main engagement approach, calculated using your reported information in indicator LEA 11. Your main approach is based on the combination of the quantity and comprehensiveness of engagements and your role/involvement. The Engagement score is not dependent on how you conduct your engagements and the top score can be achieved regardless of who conducts the engagements. For more information please see the assessment methodology and detailed methodology.

The scores for each applicable engagement approach are presented in more detail in the following pages.

Active Ownership Band	A
Engagement Band	A+
Score based on:	Individual & Collaborative
Individual Engagement Band	Α
Collaborative Engagement Band	A+
Service Provider Engagement Band	NA
(Proxy) Voting Band	Α

DIRECT - LISTED EQUITY - INDIVIDUAL ENGAGEMENTS

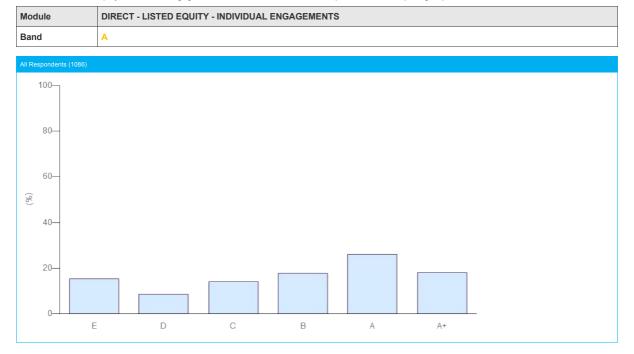
Indicator Scorecard

This section looks at how your organisation carries out engagements individually through internal staff. If your organisation did not respond to an applicable indicator, you will see a score of $\frac{1}{2}$

Section	LISTED EQUITY - INDIVIDUAL ENGAGEMENTS
Type of Engagement	INDIVIDUAL/INTERNAL STAFF ENGAGEMENTS
Total Score	28 ★ (out of a maximum 30 ★ from 10 indicators). Your score includes 3 additionally assessed indicators and the additional part of your score was calculated from LEA 06, LEA 09b, LEA 10.
Band	Α

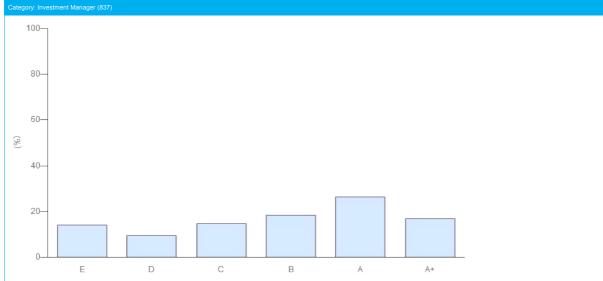
SECTION			INDICATOR	MEDIAN	CHANGE AGAINST		
SECTION	NUMBER	TYPE	ТОРІС	PEER SCORE (# PEERS)	SCORE	LAST YEAR	
OVERVIEW	LEA 01	CORE	Description of approach to engagement	★★★ (1086)	***	0	
	LEA 03	CORE	Process for identifying and prioritising engagement activities	★★★ (1086)	***	0	
INTERNAL	LEA 04	CORE	Objectives for engagement activities	★★☆ (1086)	***	0	
PROCESSES	LEA 05	CORE	Monitor/review engagement outcomes	★★★ (1086)	***	_	
	LEA 06	ADDITIONAL	Escalation strategy	★★★ (1086)	***	_	
GENERAL PROCESSES	LEA 07	ADDITIONAL	Share insights from engagements with internal/external managers	★★☆ (1086)	***	•	
	LEA 09a	CORE	Number of companies engaged with, intensity of	★★☆ (1086)	***	_	
OUTPUTS AND OUTCOMES	LEA 09b	ADDITIONAL	engagement and effort	☆☆☆ (1086)	***	0	
	LEA 10	ADDITIONAL	Engagement methods	★★☆ (1086)	***	_	
COMMUNICATION	SG 19a	CORE	Disclosure of approach to public (1086)		***	Ø	
	SG 19b	CORE	Disclosure of approach to clients/beneficiarie	★★☆ (1086)	***	0	

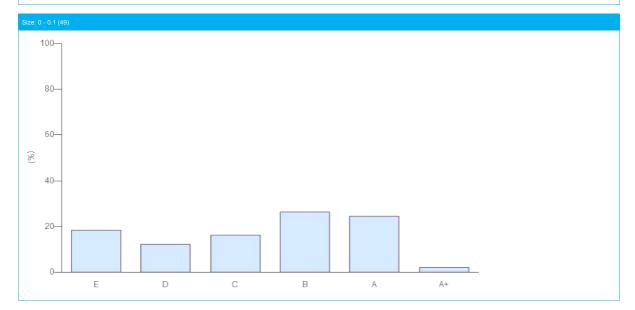
Your Direct - Listed Equity - Individual Engagements module score has been compared to relevant peer groups in a series of distribution charts below.



Your Direct - Listed Equity - Individual Engagements module score has been compared to relevant peer groups in a series of distribution charts below.

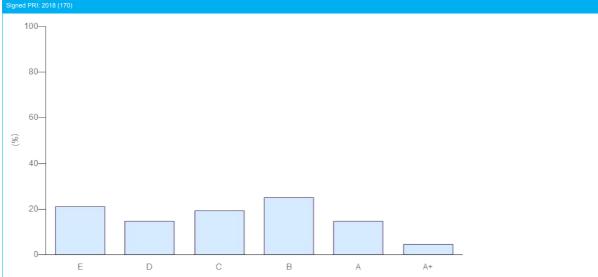


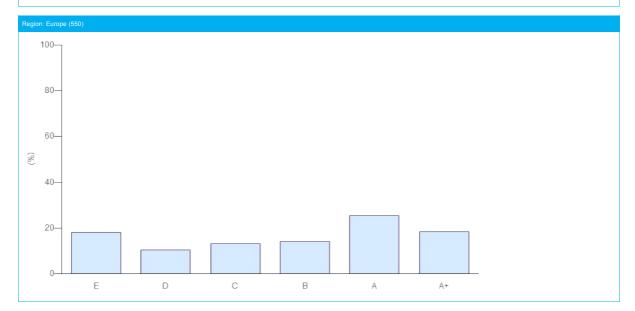




Your Direct - Listed Equity - Individual Engagements module score has been compared to relevant peer groups in a series of distribution charts below.







Direct - LISTED EQUITY - COLLABORATIVE ENGAGEMENTS

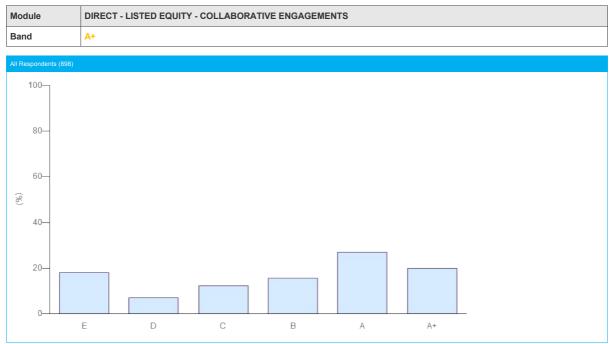
Indicator Scorecard

This section looks at how your organisation carries out engagements via collaborations. If your organisation did not respond to an applicable indicator, you will see a score of $\frac{1}{2}$

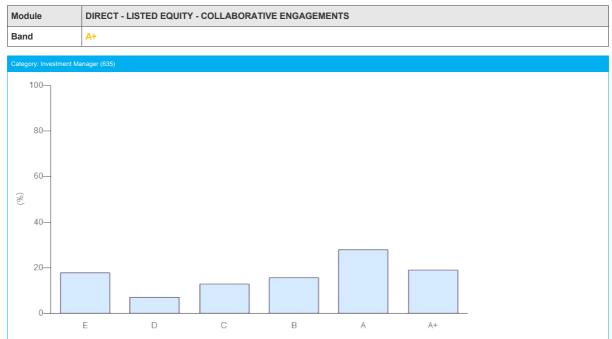
Section	LISTED EQUITY - COLLABORATIVE ENGAGEMENTS
Type of Engagement	COLLABORATIVE ENGAGEMENTS
Total Score	29 ★ (out of a maximum 30 ★ from 10 indicators). Your score includes 3 additionally assessed indicators and the additional part of your score was calculated from LEA 06, LEA 09b, LEA 10.
Band	A+

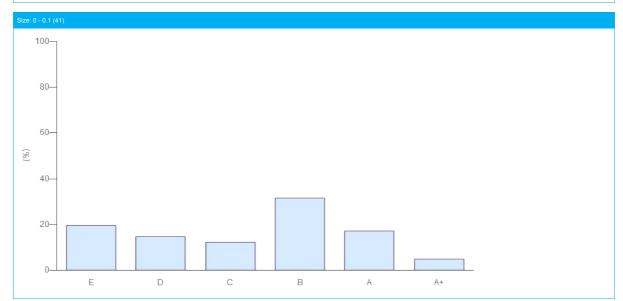
SECTION			INDICATOR			CHANGE AGAINST
SECTION	NUMBER	TYPE	ТОРІС	PEER SCORE (# PEERS)	SCORE	LAST YEAR
OVERVIEW	LEA 01	CORE	Description of approach to engagement	★★★ (899)	***	0
	LEA 03	CORE	Process for identifying and prioritising engagement activities	★★★ (899)	***	_
COLLABORATIVE	LEA 04	CORE	Objectives for engagement activities	★★☆ (899)	***	_
PROCESSES	LEA 05	CORE	Monitor/review engagement outcomes	★★☆ (899)	***	_
	LEA 06	CORE	Escalation strategy	★★★ (899)	***	_
GENERAL PROCESSES	LEA 07	ADDITIONAL	Share insights from engagements with internal/external managers	★★☆ (899)	***	O
	LEA 09a	CORE	Number of companies engaged with, intensity of engagement and effort	★★★ (899)	***	_
OUTPUTS AND OUTCOMES	LEA 09b	ADDITIONAL		★★★ (899)	***	0
	LEA 10	ADDITIONAL	Engagement methods	★★☆ (899)	***	_
COMMUNICATION	SG 19a	CORE	Disclosure of approach to public	☆☆☆ (899)	***	Ø
COMMUNICATION	SG 19b	CORE	Disclosure of approach to clients/beneficiaries	★★☆ (899)	***	Ø

Your Direct - Listed Equity - Collaborative Engagements module score has been compared to relevant peer groups in a series of distribution charts below.

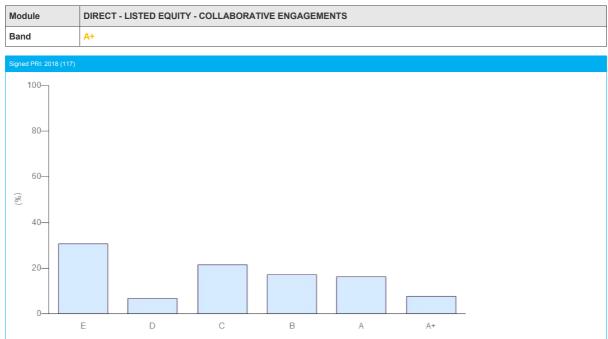


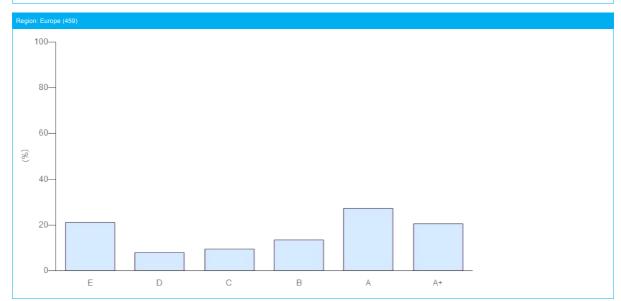
Your Direct - Listed Equity - Collaborative Engagements module score has been compared to relevant peer groups in a series of distribution charts below.





Your Direct - Listed Equity - Collaborative Engagements module score has been compared to relevant peer groups in a series of distribution charts below.





Direct - LISTED EQUITY - (PROXY) VOTING

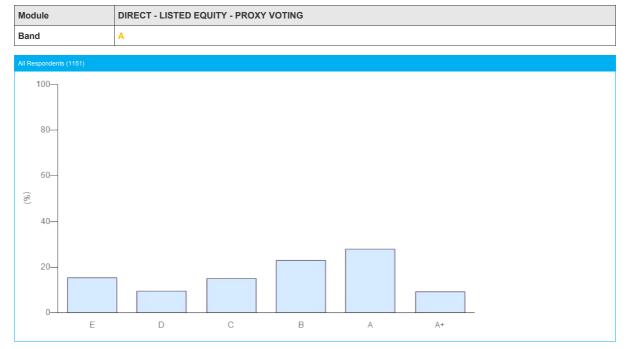
Indicator Scorecard

This section looks at how your organisation conducts (proxy) voting and shareholder resolutions decided upon by you or on your behalf by service providers in relation to your listed equity holdings. If your organisation did not respond to an applicable indicator, you will see a score of the two service to the two service providers in relation to your listed equity holdings.

Sectio	n (PROXY) VOTING & SHAREHOLDER RESOLUTIONS
Total Score	16 ★ (out of a maximum 21 ★ from 7 indicators). Your score includes 2 additionally assessed indicators and the additional part of your score was calculated from LEA 18, LEA 19.
Band	Α

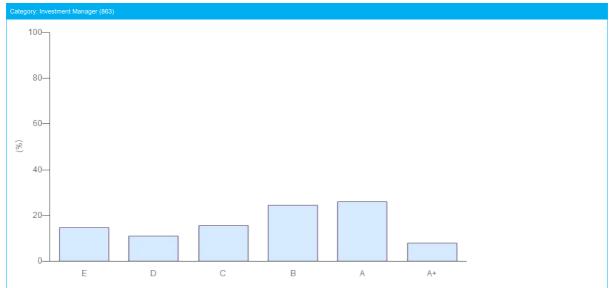
SECTION			INDICATOR	MEDIAN	YOUR	CHANGE AGAINST	
SECTION	NUMBER	ТҮРЕ ТОРІС		PEER SCORE (# PEERS)	SCORE	LAST YEAR	
	LEA 01	CORE	Voting policy	★★★ (1148)	***	_	
PROCESS	LEA 13	ADDITIONAL	Reviewing service provider voting recommendations	★☆☆ (121)	N/A	_	
PROCESS	LEA 14	ADDITIONAL	AL Securities lending programme		N/A	_	
	LEA 16	CORE	Informing companies of the rationale of abstaining/voting against management	★☆☆ (1043)	***	_	
	LEA 17	CORE	Percentage of (proxy) votes cast	★★★ (1148)	***	_	
OUTPUTS & OUTCOMES	LEA 18	ADDITIONAL	Voting instructions issued	★★★ (1148)	***	_	
	LEA 19	ADDITIONAL	Escalation strategy	☆☆☆ (1148)	***	0	
COMMUNICATION	SG 19a	CORE	Disclosure of approach to public	☆☆☆ (1148)	***	_	
	SG 19b	CORE	Disclosure of approach to clients/beneficiaries	★★☆ (1148)	***	_	

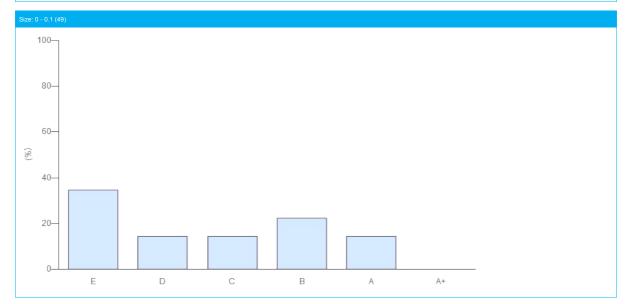
Your Direct - Listed Equity - Proxy voting module score has been compared to relevant peer groups in a series of distribution charts below.



Your Direct - Listed Equity - Proxy voting module score has been compared to relevant peer groups in a series of distribution charts below.

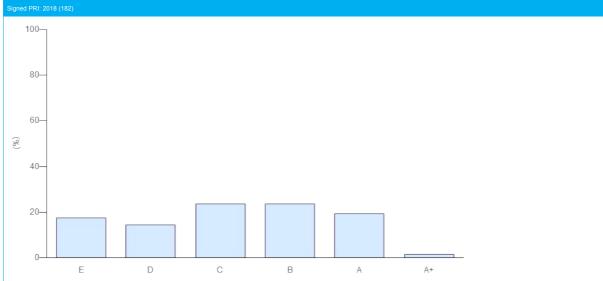
Module	DIRECT - LISTED EQUITY - PROXY VOTING
Band	Α

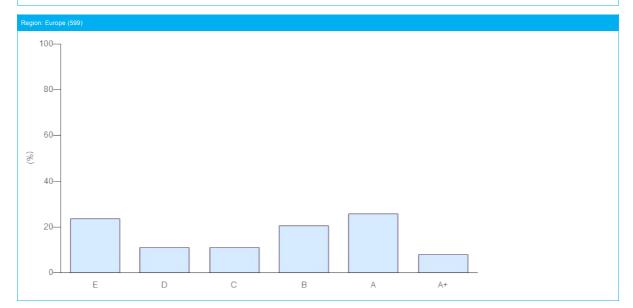




Your Direct - Listed Equity - Proxy voting module score has been compared to relevant peer groups in a series of distribution charts below.

Module	DIRECT - LISTED EQUITY - PROXY VOTING						
Band	Α						





DIRECT - FIXED INCOME (SSA)

Indicator Scorecard

This module looks at how your organisation applies ESG to your internally managed fixed income (SSA) holdings.

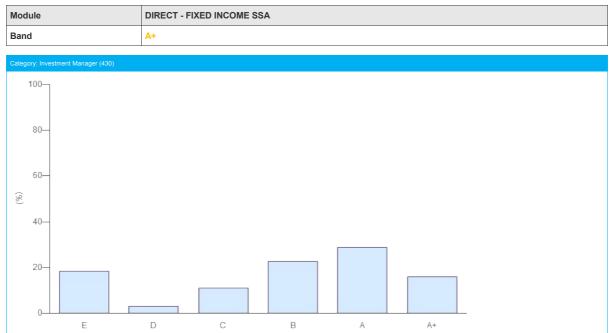
Module	FIXED INCOME (SSA)
Total Score	38 ★ (out of a maximum 39 ★ from 13 indicators). Your score includes 3 additionally assessed indicators and the additional part of your score was calculated from FI 09, FI 12, FI 17.
Band	A+

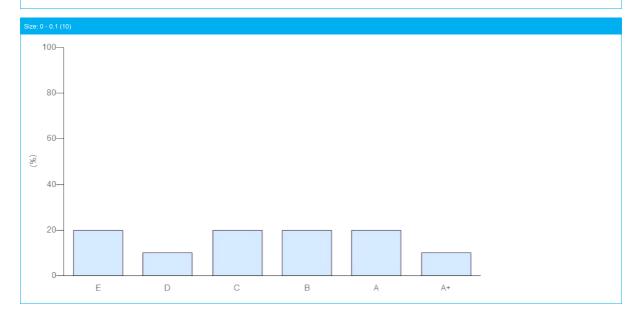
SECTION			INDICATOR	MEDIAN	YOUR	CORE LAST YEAR	
SECTION	NUMBER	TYPE	TOPIC	PEER SCORE (# PEERS)	SCORE	LAST YEAR	
	FI 02.1	CORE	ESG issues and issuer research	★★★ (592)	***	_	
IMPLEMENTATION PROCESSES	FI 02.2	CORE	ESG issues and issuer research	★★★ (592)	***	_	
	FI 03	CORE	Processes to ensure analysis is robust	★★☆ (592)	***	0	
	FI 05	ADDITIONAL	Examples of ESG factors in screening process	☆☆☆ (379)	***	—	
IMPLEMENTATION:	FI 06a	CORE	Negative Screening - ensuring criteria are met	★★☆ (332)	★★☆	0	
SCREENING	FI 06b	CORE	Positive Screening - ensuring criteria are met	★★☆ (182)	***	_	
	FI 06c	CORE	Norms Screening - ensuring criteria are met	★★☆ (213)	***	—	
IMPLEMENTATION:	FI 08	CORE	Thematic investing - themed bond processes	★★★ (140)	***	0	
THEMATIC	FI 09	ADDITIONAL	Thematic investing - assessing impact	★★☆ (140)	***	—	
IMPLEMENTATION:	FI 11	CORE	Integration - ESG information in investment processes	★★★ (368)	***	—	
INTEGRATION	FI 12	ADDITIONAL	Integration - E,S and G issues reviewed	★★★ (368)	***	—	
OUTPUTS AND OUTCOMES	FI 17	ADDITIONAL	Financial/ESG performance	☆☆☆ (592)	***	0	
COMMUNICATION	SG 19a	CORE	Disclosure of approach to public	★☆☆ (592)	***	—	
CONIVIGNICATION	SG 19b	CORE	Disclosure of approach to clients/beneficiaries	★★☆ (592)	***	_	

Your Direct - Fixed Income SSA module score has been compared to relevant peer groups in a series of distribution charts below.

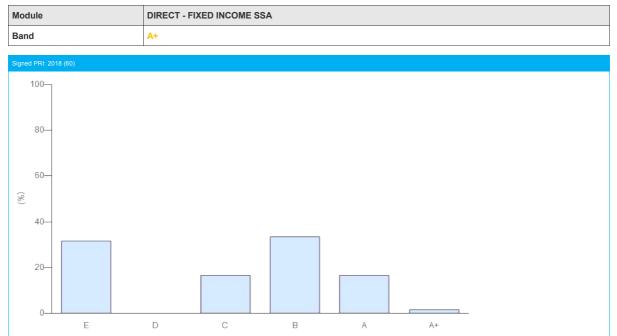


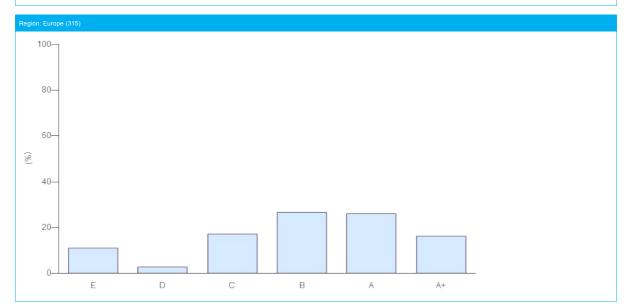
Your Direct - Fixed Income SSA module score has been compared to relevant peer groups in a series of distribution charts below.





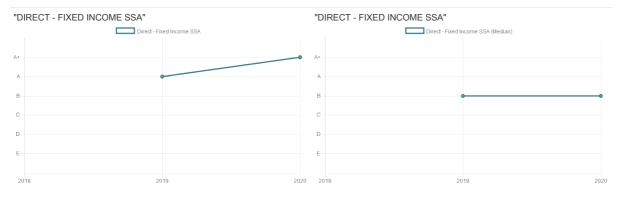
Your Direct - Fixed Income SSA module score has been compared to relevant peer groups in a series of distribution charts below.





Your Company Year-On-Year Performance

Average Year-On-Year Trends



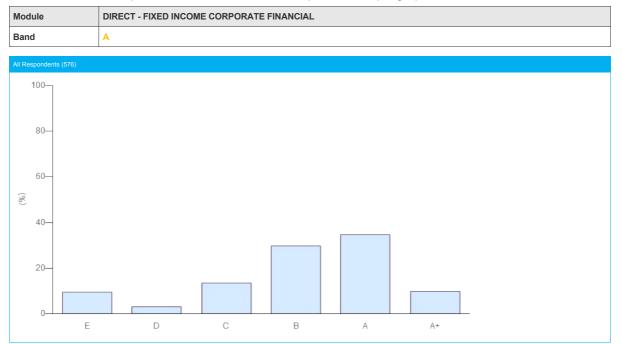
DIRECT - FIXED INCOME CORPORATE (FINANCIAL)

Indicator Scorecard

Module	FIXED INCOME CORPORATE (FINANCIAL)
Total Score	39 ★ (out of a maximum 42 ★ from 14 indicators). Your score includes 3 additionally assessed indicators and the additional part of your score was calculated from FI 09, FI 12, FI 15.
Band	Α

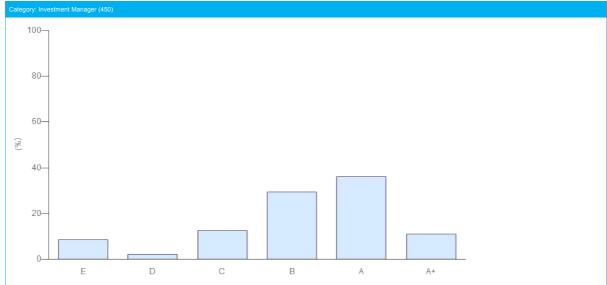
SECTION			INDICATOR	MEDIAN YOUR CHANG		CHANGE AGAINST
SECTION	NUMBER	ТҮРЕ	TOPIC	PEER SCORE (# PEERS)	SCORE	LAST YEAR
	FI 02.1	CORE	ESG issues and issuer research	★★★ (577)	***	_
IMPLEMENTATION PROCESSES	FI 02.2	CORE	ESG issues and issuer research	★★★ (577)	***	_
	FI 03	CORE	Processes to ensure analysis is robust	★★☆ (577)	***	0
	FI 05	ADDITIONAL	Examples of ESG factors in screening process	★☆☆ (445)	***	_
IMPLEMENTATION:	FI 06a	CORE	Negative Screening - ensuring criteria are met	★★☆ (417)	★★☆	0
SCREENING	FI 06b	CORE	Positive Screening - ensuring criteria are met	★★☆ (246)	***	_
	FI 06c	CORE	Norms Screening - ensuring criteria are met	★★☆ (270)	***	_
IMPLEMENTATION:	FI 08	CORE	Thematic investing - themed bond processes	★★★ (173)	***	O
THEMATIC	FI 09	ADDITIONAL	Thematic investing - assessing impact	★★☆ (173)	***	_
IMPLEMENTATION:	FI 11	CORE	Integration - ESG information in investment processes	★★★ (443)	***	_
INTEGRATION	FI 12	ADDITIONAL	Integration - E,S and G issues reviewed	★★★ (443)	***	_
	FI 14	CORE	Engagement overview and coverage	★☆☆ (564)	***	_
ENGAGEMENT	FI 15	ADDITIONAL	Engagement method	★★★ (564)	***	_
	FI 16	ADDITIONAL	Engagement policy disclosure	☆☆☆ (564)	***	—
OUTPUTS AND OUTCOMES	FI 17	ADDITIONAL	Financial/ESG performance	★☆☆ (577)	***	0
COMMUNICATION	SG 19a	CORE	Disclosure of approach to public	★★☆ (577)	***	—
COMMONICATION	SG 19b	CORE	Disclosure of approach to clients/beneficiaries	★★☆ (577)	***	_

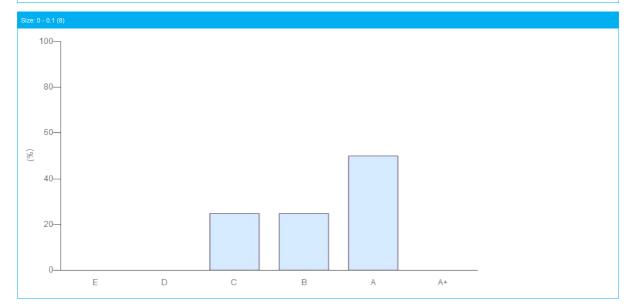
Your Direct - Fixed Income Corporate Financial module score has been compared to relevant peer groups in a series of distribution charts below.



Your Direct - Fixed Income Corporate Financial module score has been compared to relevant peer groups in a series of distribution charts below.

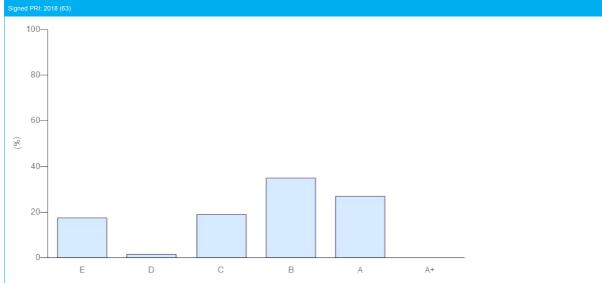


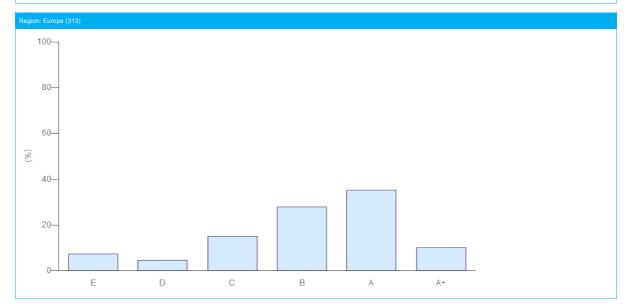




Your Direct - Fixed Income Corporate Financial module score has been compared to relevant peer groups in a series of distribution charts below.







Your Company Year-On-Year Performance



Average Year-On-Year Trends



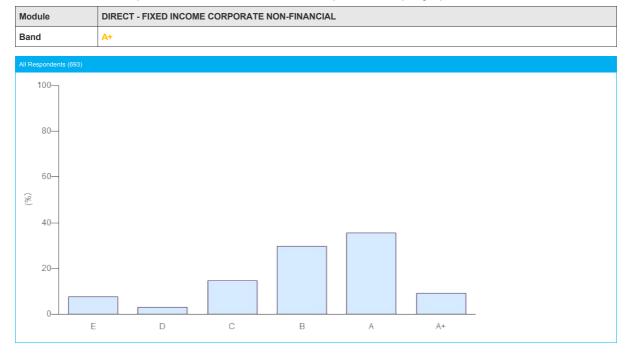
DIRECT - FIXED INCOME CORPORATE (NON-FINANCIAL)

Indicator Scorecard

Module	FIXED INCOME CORPORATE (NON-FINANCIAL)
Total Score	40 ★ (out of a maximum 42 ★ from 14 indicators). Your score includes 3 additionally assessed indicators and the additional part of your score was calculated from FI 09, FI 12, FI 15.
Band	A+

SECTION		INDICATOR MEDI/		MEDIAN	YOUR	CHANGE AGAINST
SECTION	NUMBER	TYPE	ΤΟΡΙΟ	PEER SCORE (# PEERS)	SCORE	LAST YEAR
	FI 02.1	CORE	ESG issues and issuer research	★★★ (694)	***	_
IMPLEMENTATION PROCESSES	FI 02.2	CORE	ESG issues and issuer research	★★★ (694)	***	—
	FI 03	CORE	Processes to ensure analysis is robust	★★☆ (694)	***	0
	FI 05	ADDITIONAL	Examples of ESG factors in screening process	★★★ (548)	***	•
IMPLEMENTATION:	FI 06a	CORE	Negative Screening - ensuring criteria are met	★★☆ (523)	★★☆	0
SCREENING	FI 06b	CORE	Positive Screening - ensuring criteria are met	★★☆ (293)	***	_
	FI 06c	CORE	Norms Screening - ensuring criteria are met	★★☆ (329)	***	_
IMPLEMENTATION:	FI 08	CORE	Thematic investing - themed bond processes	★★★ (204)	***	O
THEMATIC	FI 09	ADDITIONAL	Thematic investing - assessing impact	★★☆ (204)	***	_
IMPLEMENTATION:	FI 11	CORE	Integration - ESG information in investment processes	★★★ (547)	***	_
INTEGRATION	FI 12	ADDITIONAL	Integration - E,S and G issues reviewed	★★★ (547)	***	_
	FI 14	CORE	Engagement overview and coverage	★☆☆ (680)	★★☆	•
ENGAGEMENT	FI 15	ADDITIONAL	Engagement method	★★★ (680)	***	_
	FI 16	ADDITIONAL	Engagement policy disclosure	☆☆☆ (680)	***	—
OUTPUTS AND OUTCOMES	FI 17	ADDITIONAL	Financial/ESG performance	★☆☆ (694)	***	Ø
COMMUNICATION	SG 19a	CORE	Disclosure of approach to public	★☆☆ (694)	***	—
COMMUNICATION	SG 19b	CORE	Disclosure of approach to clients/beneficiaries	★★☆ (694)	***	—

Your Direct - Fixed Income Corporate Non-Financial module score has been compared to relevant peer groups in a series of distribution charts below.



20-

0-

100-

80-

60-

40-

20-

0-

Е

%

Е

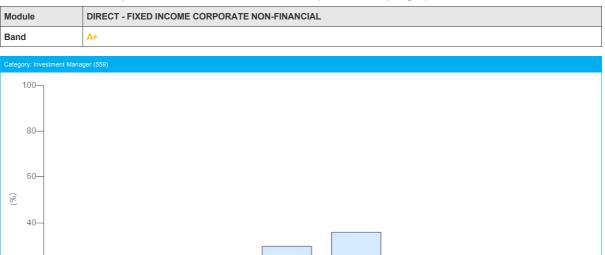
D

D

С

С

Your Direct - Fixed Income Corporate Non-Financial module score has been compared to relevant peer groups in a series of distribution charts below.



В

В

А

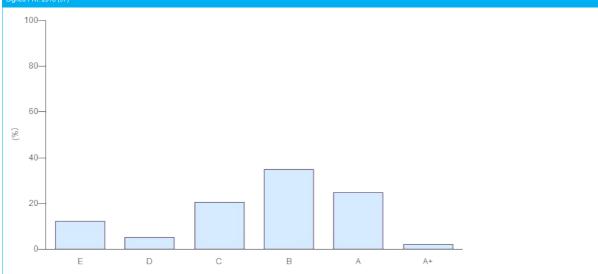
А

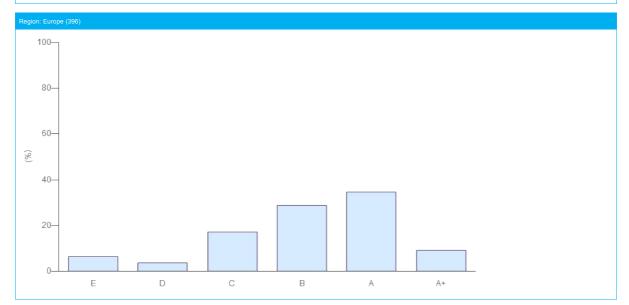
A+

A+

Your Direct - Fixed Income Corporate Non-Financial module score has been compared to relevant peer groups in a series of distribution charts below.







Your Company Year-On-Year Performance

"DIRECT - FIXED INCOME CORPORATE NON-FINANCIAL"

Average Year-On-Year Trends



DIRECT - FIXED INCOME SECURITISED

Indicator Scorecard

Module	FIXED INCOME (SECURITISED)
Total Score	39 ★ (out of a maximum 42 ★ from 14 indicators). Your score includes 3 additionally assessed indicators and the additional part of your score was calculated from FI 05, FI 09, FI 12.
Band	Α

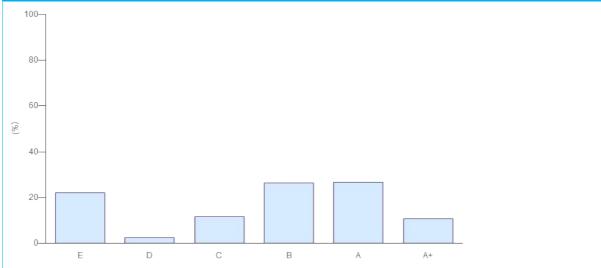
	INDICATOR		MEDIAN	YOUR	CHANGE AGAINST	
SECTION	NUMBER	ТҮРЕ	ТОРІС	PEER SCORE (# PEERS)	SCORE	LAST YEAR
	FI 02.1	CORE	ESG issues and issuer research	★★★ (270)	***	-
IMPLEMENTATION PROCESSES	FI 02.2	CORE	ESG issues and issuer research	★★★ (270)	***	_
	FI 03	CORE	Processes to ensure analysis is robust	★★☆ (270)	***	•
	FI 05	ADDITIONAL	Examples of ESG factors in screening process	☆☆☆ (151)	***	٥
IMPLEMENTATION:	FI 06a	CORE	Negative Screening - ensuring criteria are met	★★☆ (127)	***	0
SCREENING	FI 06b	CORE	Positive Screening - ensuring criteria are met	★★★ (63)	***	_
	FI 06c	CORE	Norms Screening - ensuring criteria are met	★★★ (82)	***	_
IMPLEMENTATION:	FI 08	CORE	Thematic investing - themed bond processes	★★★ (54)	***	•
THEMATIC	FI 09	ADDITIONAL	Thematic investing - assessing impact	★★★ (54)	***	_
IMPLEMENTATION:	FI 11	CORE	Integration - ESG information in investment processes	★★★ (159)	***	_
INTEGRATION	FI 12	ADDITIONAL	Integration - E,S and G issues reviewed	★★★ (159)	***	_
	FI 14	CORE	Engagement overview and coverage	☆☆☆ (265)	***	_
ENGAGEMENT	FI 15	ADDITIONAL	Engagement method	★★★ (261)	***	_
	FI 16	ADDITIONAL	Engagement policy disclosure	☆☆☆ (265)	***	_
OUTPUTS AND OUTCOMES	FI 17	ADDITIONAL	Financial/ESG performance	☆☆☆ (270)	***	٥
COMMUNICATION	SG 19a	CORE	Disclosure of approach to public	☆☆☆ (270)	***	_
COMMUNICATION	SG 19b	CORE	Disclosure of approach to clients/beneficiaries	★★☆ (270)	***	_

Your Direct - Fixed Income Securitised module score has been compared to relevant peer groups in a series of distribution charts below.



Your Direct - Fixed Income Securitised module score has been compared to relevant peer groups in a series of distribution charts below.

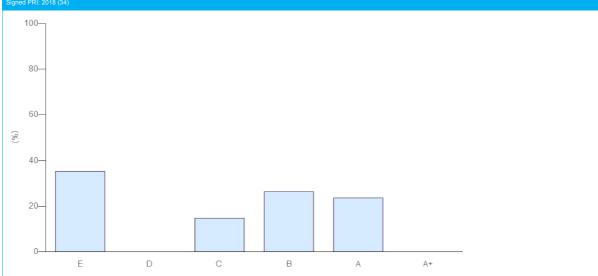
Module	DIRECT - FIXED INCOME SECURITISED				
Band	Α				
Category: Investment Manager (213)					

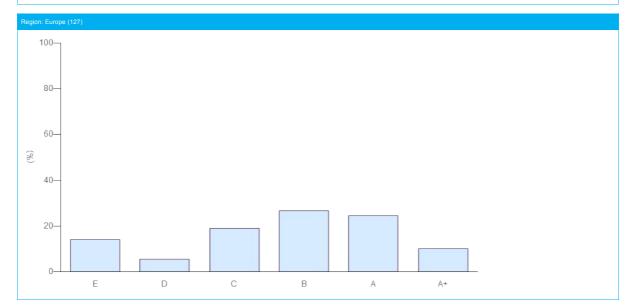




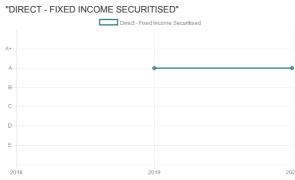
Your Direct - Fixed Income Securitised module score has been compared to relevant peer groups in a series of distribution charts below.

Module	DIRECT - FIXED INCOME SECURITISED
Band	Α
Signed PRI: 2018 (34)	





Your Company Year-On-Year Performance



Average Year-On-Year Trends

