



Gateway		Reason for Interaction
Type of engagement	Individual/ internal staff engagements	<input checked="" type="checkbox"/> To support investment decisionmaking in & company related ESG issues <input checked="" type="checkbox"/> To enhance corporate practice or identify the need to enhance corporate practice <input checked="" type="checkbox"/> To engage internal ESG resources <input type="checkbox"/> Other - specify
Type of engagement	Collaborative engagements	<input type="checkbox"/> To support investment decisionmaking in & company related ESG issues <input checked="" type="checkbox"/> To enhance corporate practice or identify the need to enhance corporate practice <input type="checkbox"/> Other - specify
Type of engagement	Service provider engagements	<input type="checkbox"/> To support investment decisionmaking in & company related ESG issues <input checked="" type="checkbox"/> To enhance corporate practice or identify the need to enhance corporate practice <input type="checkbox"/> Other - specify

RI TRANSPARENCY REPORT

2019

Old Mutual

About this report

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

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

PRI disclaimer

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OO 01.1 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
- Corporate pension or superannuation or retirement or provident fund or plan
- Insurance company
- Foundation
- Endowment
- Development finance institution
- Reserve - sovereign or government controlled fund
- Family office
- Other, specify

Old Mutual Limited is an investment, savings and insurance, banking group.

OO 01.3 Additional information. [Optional]

Since the listing in June 2018, the Group has an ambition to become a premium financial services group in sub-Saharan Africa and currently offers a broad spectrum of financial solutions to retail and corporate customers across key markets in 17 countries. The Group primarily operates in South Africa and the rest of Africa, and has niche businesses in Latin America and China. The Group's lines of business include Life and Savings, Property and Casualty, Asset Management and Banking and Lending. It distributes products and services to customers through a multi-channel distribution network spanning tied and independent advisers, branches, bancassurance, direct and digital channels, and worksites. The Group is recognised as a leading long-term insurance brand, ranking first in the long-term insurance business-to-consumer category in South Africa for 13 consecutive years according to the Sunday Times Top Brands Awards. It is also a Top Employer in South Africa, ranking first for financial services and insurance companies for 7 consecutive years, and first overall in South Africa for 2018 according to the Top Employers Institute. The Group is certified as a Top Employer across all 13 African countries in which it operates according to the Top Employers Institute.

The Group is well-positioned in Southern Africa, while having exposure to key growth markets in East and West Africa. The Group has a track record of improving RoNAV, cash generation and capital strength, which it aims to maintain going forward while reducing costs across the organisation.

OO 02.1 Select the location of your organisation's headquarters.

South Africa

OO 02.2 Indicate the number of countries in which you have offices (including your headquarters).

- 1
- 2-5
- 6-10
- >10

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

30365

OO 03.1 Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.

- Yes

OO 03.2 List your subsidiaries that are separate PRI signatories and indicate if you would like to report their RI activities in your organisation's consolidated report.

Name of PRI signatory subsidiary (Up to six subsidiaries may be reported)	RI implementation reported here on a consolidated basis
Futuregrowth	<input checked="" type="radio"/> Yes <input type="radio"/> No
UFF African Agri Investments	<input checked="" type="radio"/> Yes <input type="radio"/> No
<input checked="" type="radio"/> Yes <input type="radio"/> No	
<input checked="" type="radio"/> Yes <input type="radio"/> No	
<input checked="" type="radio"/> Yes <input type="radio"/> No	

No

OO 04	Mandatory	Gateway/Peering	General
OO 04.1	Indicate the year end date for your reporting year.		
	31/12/2018		
OO 04.2	Indicate your total AUM at the end of your reporting year.		
	Total AUM 724,400,000,000 ZAR 53,298,520,439 USD		
OO 04.5	Additional information. [Optional]		
	This refers to Old Mutual Wealth and Investments https://www.oldmutual.com/docs/default-source/investor-relations-files/oml-results/results-2019-(mar)/oml-reviewed-preliminary-annual-results-2018---booklet.pdf?sfvrsn=8a16118c_6		

OO 05	Mandatory to Report, Voluntary to Disclose	Gateway	General																																																
OO 05.1	Provide an approximate percentage breakdown of your AUM at the end of your reporting year using the following asset classes and investment strategies:																																																		
	<table border="1"> <thead> <tr> <th></th> <th>Internally managed (%)</th> <th>Externally managed (%)</th> </tr> </thead> <tbody> <tr><td>Listed equity</td><td>10-50%</td><td><10%</td></tr> <tr><td>Fixed income</td><td>10-50%</td><td>0</td></tr> <tr><td>Private equity</td><td><10%</td><td>0</td></tr> <tr><td>Property</td><td><10%</td><td>0</td></tr> <tr><td>Infrastructure</td><td><10%</td><td>0</td></tr> <tr><td>Commodities</td><td>0</td><td>0</td></tr> <tr><td>Hedge funds</td><td><10%</td><td>0</td></tr> <tr><td>Fund of hedge funds</td><td>0</td><td>0</td></tr> <tr><td>Forestry</td><td>0</td><td>0</td></tr> <tr><td>Farmland</td><td>0</td><td>0</td></tr> <tr><td>Inclusive finance</td><td>0</td><td>0</td></tr> <tr><td>Cash</td><td>0</td><td>0</td></tr> <tr><td>Money market instruments</td><td>10-50%</td><td>0</td></tr> <tr><td>Other (1), specify</td><td>0</td><td>0</td></tr> <tr><td>Other (2), specify</td><td>0</td><td>0</td></tr> </tbody> </table>				Internally managed (%)	Externally managed (%)	Listed equity	10-50%	<10%	Fixed income	10-50%	0	Private equity	<10%	0	Property	<10%	0	Infrastructure	<10%	0	Commodities	0	0	Hedge funds	<10%	0	Fund of hedge funds	0	0	Forestry	0	0	Farmland	0	0	Inclusive finance	0	0	Cash	0	0	Money market instruments	10-50%	0	Other (1), specify	0	0	Other (2), specify	0	0
	Internally managed (%)	Externally managed (%)																																																	
Listed equity	10-50%	<10%																																																	
Fixed income	10-50%	0																																																	
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Forestry	0	0																																																	
Farmland	0	0																																																	
Inclusive finance	0	0																																																	
Cash	0	0																																																	
Money market instruments	10-50%	0																																																	
Other (1), specify	0	0																																																	
Other (2), specify	0	0																																																	

OO 06	Mandatory	Descriptive	General
OO 06.1	Select how you would like to disclose your asset class mix.		
	<input type="radio"/> as percentage breakdown <input checked="" type="radio"/> as broad ranges		
OO 06.3	Indicate whether your organisation has any off-balance sheet assets [Optional].		
	<input type="radio"/> Yes <input checked="" type="radio"/> No		
OO 06.5	Indicate whether your organisation uses fiduciary managers.		
	<input checked="" type="radio"/> Yes, we use a fiduciary manager and our response to OO 5.1 is reflective of their management of our assets. <input type="radio"/> No, we do not use fiduciary managers.		

OO 07	Mandatory to Report, Voluntary to Disclose	Gateway	General
Private			
OO 08	Mandatory to Report, Voluntary to Disclose	Peering	General
Private			
OO 09	Mandatory	Peering	General
OO 09.1	Indicate the breakdown of your organisation's AUM by market.		
23	Developed Markets		
71	Emerging Markets		
2	Frontier Markets		
4	Other Markets		
OO 10	Mandatory	Gateway	General
OO 10.1	Select the active ownership activities your organisation implemented in the reporting year.		
	Listed equity – engagement		
	<input checked="" type="checkbox"/> We engage with companies on ESG factors via our staff, collaborations or service providers. <input type="checkbox"/> We require our external managers to engage with companies on ESG factors on our behalf. <input type="checkbox"/> We do not engage directly and do not require external managers to engage with companies on ESG factors.		
	Listed equity – voting		
	<input checked="" type="checkbox"/> We cast our (proxy) votes directly or via dedicated voting providers <input type="checkbox"/> We require our external managers to vote on our behalf. <input type="checkbox"/> We do not cast our (proxy) votes directly and do not require external managers to vote on our behalf		
	Fixed income SSA – engagement		
	<input checked="" type="checkbox"/> We engage with SSA bond issuers on ESG factors via our staff, collaborations or service providers. <input type="checkbox"/> We do not engage directly and do not require external managers to engage with SSA bond issuers on ESG factors. Please explain why you do not.		
	Fixed income Corporate (financial) – engagement		
	<input checked="" type="checkbox"/> We engage with companies on ESG factors via our staff, collaborations or service providers. <input type="checkbox"/> We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.		
	Fixed income Corporate (non-financial) – engagement		
	<input checked="" type="checkbox"/> We engage with companies on ESG factors via our staff, collaborations or service providers. <input type="checkbox"/> We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.		
	Fixed income Corporate (securitised) – engagement		
	<input checked="" type="checkbox"/> We engage with companies on ESG factors via our staff, collaborations or service providers. <input type="checkbox"/> We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.		
OO 11	Mandatory	Gateway	General
OO 11.1	Select the internally managed asset classes in which you addressed ESG incorporation into your investment decisions and/or your active ownership practices (during the reporting year).		
	Listed equity		
	<input checked="" type="checkbox"/> We address ESG incorporation. <input type="checkbox"/> We do not do ESG incorporation.		
	Fixed income - SSA		
	<input type="checkbox"/> We address ESG incorporation. <input checked="" type="checkbox"/> We do not do ESG incorporation.		
	Fixed income - corporate (financial)		
	<input type="checkbox"/> We address ESG incorporation.		

We do not do ESG incorporation.

Fixed income - corporate (non-financial)

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

Fixed income - securitised

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

Private equity

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

Property

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

Infrastructure

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

Hedge funds

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

Money market instruments

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

OO 11.2 Select the externally managed assets classes in which you and/or your investment consultants address ESG incorporation in your external manager selection, appointment and/or monitoring processes.

Asset class	ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes
Listed equity	Listed equity - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes
	<input type="checkbox"/> We incorporate ESG into our external manager selection process <input type="checkbox"/> We incorporate ESG into our external manager appointment process <input type="checkbox"/> We invest only in pooled funds and external manager appointment is not applicable <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation

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

We consider the internal processes of the investment managers to ensure that they are able to meet our mandate. We would look to see if they use systems to ensure they cannot select excluded stock, data they incorporate into their investment decisions and their engagement plans.

OO 12	Mandatory	Gateway	General
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OO 12.1 Below are all applicable modules or sections you may report on. Those which are mandatory to report (asset classes representing 10% or more of your AUM) are already ticked and read-only. Those which are voluntary to report on can be opted into by ticking the box.

Core modules	<input checked="" type="checkbox"/> Organisational Overview <input checked="" type="checkbox"/> Strategy and Governance
RI implementation directly or via service providers	
Direct - Listed Equity incorporation	<input checked="" type="checkbox"/> Listed Equity incorporation
Direct - Listed Equity active ownership	<input checked="" type="checkbox"/> Engagements <input checked="" type="checkbox"/> (Proxy) voting
Direct - Other asset classes with dedicated modules	

- Private Equity
- Property
- Infrastructure
- Hedge Funds and/or Fund of Hedge Funds

RI implementation via external managers

Indirect - Selection, Appointment and Monitoring of External Managers

- Listed Equities

Closing module

- Closing module

OO 12.2 Additional information. [Optional]

N/A

OO LE 01 Mandatory Gateway General

OO LE 01.1 Provide a breakdown of your internally managed listed equities by passive, active - quantitative (quant), active - fundamental and active - other strategies.

Strategies	Percentage of internally managed listed equities
Passive	<input type="radio"/> >50% <input checked="" type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%
Active - quantitative (quant)	<input type="radio"/> >50% <input type="radio"/> 10-50% <input checked="" type="radio"/> <10% <input type="radio"/> 0%
Active - fundamental and active - other	<input checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%
Total 100%	

OO LE 02 Mandatory to Report, Voluntary to Disclose Gateway General

Private

OO FI 01 Mandatory Gateway General

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

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

Securitised	<input type="radio"/> >50% <input type="radio"/> 10-50% <input checked="" type="radio"/> <10% <input type="radio"/> 0%	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%	<input checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%	100%
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OO FI 03 Mandatory Descriptive General

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

SSA	8	Developed markets
	92	Emerging markets

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

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

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

Private

OO PE 01 Mandatory Descriptive General

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

Investment strategy	Percentage of your internally managed private equity holdings (in terms of AUM)
Venture capital	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%
Growth capital	<input type="radio"/> >50% <input checked="" type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%
(Leveraged) buy-out	<input type="radio"/> >50% <input checked="" type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%
Distressed/Turnaround/Special Situations	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%

Secondaries	<input type="radio"/> >50% <input type="radio"/> 10-50% <input checked="" type="radio"/> <10% <input type="radio"/> 0%
Other investment strategy, specify (1)	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%
Other investment strategy, specify (2)	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%
Total 100%	

OO PE 02	Mandatory to Report, Voluntary to Disclose	Descriptive	General
Private			
OO PR 01	Mandatory to Report, Voluntary to Disclose	Descriptive	General
Private			
OO PR 02	Mandatory to Report, Voluntary to Disclose	Gateway	General
Private			
OO PR 03	Mandatory to Report, Voluntary to Disclose	Descriptive	General
Private			
OO INF 01	Mandatory to Report, Voluntary to Disclose	Descriptive	General
Private			
OO INF 02	Mandatory to Report, Voluntary to Disclose	Gateway/Peering	General
Private			
OO INF 03	Mandatory to Report, Voluntary to Disclose	Descriptive	General
Private			
OO HF 01	Mandatory to Report, Voluntary to Disclose	Descriptive	General
Private			

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

Yes

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

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

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

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

Other description (1)

The policy also speaks to the varying roles often assumed by our organisation i.e. Asset Owner & Asset Manager.

Other RI considerations, specify (2)

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

The groups commitment to responsible investment (RI) is founded on an understanding of the growing sustainability trend and its potential to impact the competitive landscape across sectors. Consequently, we believe that incorporating the consideration of relevant material environmental, social and governance (ESG) factors into our investment and ownership decisions is aligned with the pursuit of superior long-term risk-adjusted returns for our beneficiaries, clients and society at large.

For more information please see:

<http://ww2.oldmutual.co.za/old-mutual-investment-group/about-us/responsible-investing/ri-resources>

SG 01.5 Provide a brief description of the key elements, any variations or exceptions to your investment policy that covers your responsible investment approach. [Optional]

The key activities highlighted in the investment policy are undertaken in a manner that is consistent with existing mandates noted below:

- To act as a responsible stewards of assets
- To play a leadership role with regard to Responsible Investment (RI)
- Transparency and disclosure

No

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

Policy setting out your overall approach

URL/Attachment

URL

http://ww2.oldmutual.co.za/docs/default-source/old-mutual-south-africa/omig/omig-about-us/responsible-investments/listed_equity_stewardship_guidelines.pdf?sfvrsn=2

- Attachment (will be made public)
Listed_equity_stewardship_guidelines.pdf
- Asset class-specific RI guidelines
- Engagement policy

URL/Attachment

- URL
http://ww2.oldmutual.co.za/docs/default-source/old-mutual-south-africa/omig/omig-about-us/responsible-investments/listed_equity_stewardship_guidelines.pdf?sfvrsn=2
- Attachment (will be made public)
Listed_equity_stewardship_guidelines.pdf
- (Proxy) voting policy

URL/Attachment

- URL
<http://ww2.oldmutual.co.za/docs/default-source/old-mutual-south-africa/omig/omig-about-us/responsible-investments/listed-equity-proxy-voting-policy-february-2018.pdf>
- Attachment (will be made public)
10558 Listed Equity Proxy Voting Policy February 2018.pdf
- We do not publicly disclose our investment policy documents

SG 02.2	Indicate if any of your investment policy components are publicly available. Provide URL and an attachment of the document.
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- Your organisation's definition of ESG and/or responsible investment and it's relation to investments

URL/Attachment

- URL
http://ww2.oldmutual.co.za/docs/default-source/old-mutual-south-africa/omig/omig-about-us/responsible-investments/listed_equity_stewardship_guidelines.pdf?sfvrsn=2
- Attachment
Listed_equity_stewardship_guidelines.pdf

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

URL/Attachment

- URL
<http://www.oldmutualplc.com/rb/investment.jsp>
- Attachment

- Time horizon of your investment
- Governance structure of organisational ESG responsibilities
- ESG incorporation approaches
- Active ownership approaches

URL/Attachment

- URL
<http://ww2.oldmutual.co.za/docs/default-source/old-mutual-south-africa/omig/omig-about-us/responsible-investments/10709-responsible-ownership-report-2017.pdf>
- Attachment
Responsible-ownership-report-2017.pdf

- Reporting
- Other RI considerations, specify (1)
- We do not publicly disclose any investment policy components

SG 02.3	Additional information [Optional].
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The inclusion of the governance structure of organisational ESG responsibilities in the organisations investment policy is an RI objective that is set out for the year 2020.

SG 03	Mandatory	Core Assessed	General
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SG 03.1	Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.
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- Yes

SG 03.2	Describe your policy on managing potential conflicts of interest in the investment process.
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Conflicts of Interest that may arise between OML Group legal entities and current or prospective customers are addressed by the OML Level 1

Market Conduct and Regulatory Compliance policies, as informed by applicable regulatory requirements.

Boards of subsidiaries are required to adopt this Policy and ensure all the applicable requirements are implemented and complied with, unless it is expressly agreed otherwise. Boards must ensure local regulatory requirements that apply are included in policies adopted at subsidiary level. Local regulatory requirements prevail where such requirements are more rigorous or in conflict with this Policy. Where appropriate, subsidiaries must apply for waivers from the OML Risk Sponsor.

No

SG 04	Voluntary	Descriptive	General
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Private

SG 05	Mandatory	Gateway/Core Assessed	General
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SG 05.1 Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.

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

SG 06	Voluntary	Descriptive	General
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Private

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

Roles

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

Select from the below internal roles

- Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Other Chief-level staff or head of department, specify
- Portfolio managers
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Investment analysts
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Dedicated responsible investment staff
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Investor relations
- Other role, specify (1)

Other description (1)

Head of Responsible Business

- Oversight/accountability for responsible investment
- Implementation of responsible investment
- No oversight/accountability or implementation responsibility for responsible investment

- Other role, specify (2)
- External managers or service providers
- Oversight/accountability for responsible investment
- Implementation of responsible investment
- No oversight/accountability or implementation responsibility for responsible investment

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

1. There are weekly/monthly and quarterly reports board papers
2. Individuals with roles that have RI oversight/accountability or implementation responsibilities also have to submit balance scorecards
3. Since there is public disclosure regarding these elements - individuals with RI oversight/accountability are kept accountable through reporting.

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

11

SG 08	Voluntary	Additional Assessed	General
Private			

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

- Principles for Responsible Investment

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

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
Old Mutual became a a signatory to the UNPRI in 2012. Being a signatory means that the Group is required to undergo regular reporting on how the Group is embedding RI principles. In addition to that - the Head of RI is a member of the Reporting & Assessment Advisory Committee (RAAC) of the PRI.

- Asian Corporate Governance Association
- Australian Council of Superannuation Investors
- AFIC – La Commission ESG
- BVCA – Responsible Investment Advisory Board
- CDP Climate Change

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

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
As a new legal entity - Old Mutual Limited has not yet disclosed for CDP however, as Old Mutual PLC (prior the managed separation) - the Old Mutual Group complied to the fullest extent possible on a major portion of our properties and carbon footprint according to the operational methodology for scope 1 & 2 (with minor disclosure for scope 3).

- CDP Forests
- CDP Water
- CFA Institute Centre for Financial Market Integrity
- Code for Responsible Investment in SA (CRISA)

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

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
Our organisation is highly committed to the Code for Responsible Investment of South Africa (CRISA) and provides an annual Impact Report based on the CRISA principles.
See link below: http://ww2.oldmutual.co.za/docs/default-source/old-mutual-south-africa/omig/omig-about-us/responsible-investments/investment-group-impact-report-2018.pdf

- Code for Responsible Finance in the 21st Century
- Council of Institutional Investors (CII)
- Eumedion

- Extractive Industries Transparency Initiative (EITI)
- ESG Research Australia
- Invest Europe Responsible Investment Roundtable
- Global Investors Governance Network (GIGN)

Your organisation's role in the initiative during the reporting period (see definitions)
Basic
Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
We draw on their resources to guide our practise.

- Global Impact Investing Network (GIIN)

Your organisation's role in the initiative during the reporting period (see definitions)
Basic
Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
We draw on their resources to guide our practise.

- Global Real Estate Sustainability Benchmark (GRESB)

Your organisation's role in the initiative during the reporting period (see definitions)
Moderate
Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
We draw on their resources to guide our practise.

- Green Bond Principles
- Institutional Investors Group on Climate Change (IIGCC)

Your organisation's role in the initiative during the reporting period (see definitions)
Basic
Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
We draw on their resources to guide our practise.

- Interfaith Center on Corporate Responsibility (ICCR)
- International Corporate Governance Network (ICGN)

Your organisation's role in the initiative during the reporting period (see definitions)
Basic
Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
We draw on their resources to guide our practise.

- Investor Group on Climate Change, Australia/New Zealand (IGCC)
- International Integrated Reporting Council (IIRC)

Your organisation's role in the initiative during the reporting period (see definitions)
Basic
Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
We did a case study for the IIRC.

- Investor Network on Climate Risk (INCR)/CERES
- Local Authority Pension Fund Forum
- Principles for Sustainable Insurance
- Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify
- Responsible Finance Principles in Inclusive Finance
- Shareholder Association for Research and Education (Share)
- United Nations Environmental Program Finance Initiative (UNEP FI)
- United Nations Global Compact

Your organisation's role in the initiative during the reporting period (see definitions)
Basic
Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
Old Mutual Limited applies the United Nations Global Compact standard reporting criteria.

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

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

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

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

SG 10.2	Indicate the actions your organisation has taken to promote responsible investment independently of collaborative initiatives. Provide a description of your role in contributing to the objectives of the selected action and the typical frequency of your participation/contribution.
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- Provided or supported education or training programmes (this includes peer to peer RI support) Your education or training may be for clients, investment managers, actuaries, broker/dealers, investment consultants, legal advisers etc.)

Description	Provided training for clients and our investment managers.
-------------	--

Frequency of contribution	<input type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input checked="" type="radio"/> Ad hoc <input type="radio"/> Other
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- Provided financial support for academic or industry research on responsible investment
- Provided input and/or collaborated with academia on RI related work

Description	The Old Mutual Investment Group Head of Engagement provided insight for a study conducted by the University of Stellenbosch showcasing the success rate and results of active ownership i.e. engagement activity.
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Frequency of contribution	<input type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input checked="" type="radio"/> Ad hoc <input type="radio"/> Other
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- Encouraged better transparency and disclosure of responsible investment practices across the investment industry

Description	Promoted the benefits of open communication and reporting with regards to RI.
-------------	---

Frequency of contribution	<input type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input checked="" type="radio"/> Ad hoc <input type="radio"/> Other
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- Spoke publicly at events and conferences to promote responsible investment

Description	Head of Responsible Investment and members of his team speak regularly at events.
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Frequency of contribution	<input checked="" type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input type="radio"/> Ad hoc
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Other

Wrote and published in-house research papers on responsible investment

Description
Published Tomorrow As Invested As You Are again in 2018. Which was leveraged within the business through internal emails, newsletters and videos as well as externally.
Frequency of contribution
<input checked="" type="radio"/> Quarterly or more frequently
<input type="radio"/> Biannually
<input type="radio"/> Annually
<input type="radio"/> Less frequently than annually
<input type="radio"/> Ad hoc
<input type="radio"/> Other

Encouraged the adoption of the PRI

Description
Through our engagements and manager selection we ask about adoption of PRI if they are not members and explain the benefits.
Frequency of contribution
<input checked="" type="radio"/> Quarterly or more frequently
<input type="radio"/> Biannually
<input type="radio"/> Annually
<input type="radio"/> Less frequently than annually
<input type="radio"/> Ad hoc
<input type="radio"/> Other

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

Wrote and published articles on responsible investment in the media

Description
Published Tomorrow As Invested As You Are again in 2018. Which leveraged web content including videos as well as external newspaper articles and magazine content. The organisation also published the 2018 Impact Report which is an annual showcase of Old Mutuals' commitment to investing in ventures that support socially inclusive, low-carbon and resource-efficient outcomes.
Frequency of contribution
<input checked="" type="radio"/> Quarterly or more frequently
<input type="radio"/> Biannually
<input type="radio"/> Annually
<input type="radio"/> Less frequently than annually
<input type="radio"/> Ad hoc
<input type="radio"/> Other

A member of PRI advisory committees/ working groups, specify

Description
The Head of Responsible Investment is a member of the Reporting and Assessment Advisory Committee (RAAC).
Frequency of contribution
<input type="radio"/> Quarterly or more frequently
<input type="radio"/> Biannually
<input checked="" type="radio"/> Annually
<input type="radio"/> Less frequently than annually
<input type="radio"/> Ad hoc
<input type="radio"/> Other

On the Board of, or officially advising, other RI organisations (e.g. local SIFs)

Description
The Head of Responsible Investment is a part of the National Advisory Board of Impact Investing.
Frequency of contribution
<input type="radio"/> Quarterly or more frequently
<input type="radio"/> Biannually
<input checked="" type="radio"/> Annually
<input type="radio"/> Less frequently than annually

- Ad hoc
- Other
- Other, specify
- No

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

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

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

SG 12.5 Indicate whether your organisation considers any of the following responsible investment factors in the monitoring of fiduciary managers

- Including responsible investment as a standard agenda item at performance review meetings
- Discussing whether the fiduciary manager has acted in accordance with your organisation's overall investment beliefs/ strategy/ policy on responsible investment and ESG factors
- Reviewing the fiduciary manager's PRI Transparency or Assessment reports
- Reviewing the fiduciary manager's responsible investment reporting (excluding PRI generated reports)
- Reviewing ESG characteristics/factors used by the fiduciary manager in portfolio construction
- Reviewing the fiduciary manager's incorporation approaches of ESG through-out asset classes
- Reviewing the impact of ESG factors on financial performance
- Encouraging your fiduciary managers to consider joining responsible investment initiatives/organisations or participate in educational or collaborative projects with other investors
- Including responsible investment criteria as a formal component of overall manager performance evaluation
- Reviewing the fiduciary manager's ESG incorporation in external managers' selection, appointment, monitoring
- Reviewing how ESG materiality is defined by the fiduciary manager
- Other general aspects of your monitoring; specify
- We do not consider responsible investment in the monitoring processes for fiduciary managers.

SG 12.6 Describe the approach you take to monitoring your fiduciary managers and the reason(s) for this approach [Optional].

Please see responsible Investment Report: Link below
<http://ww2.oldmutual.co.za/docs/default-source/old-mutual-south-africa/omig/omig-about-us/responsible-investments/responsible-investment-report--june-2017.pdf?sfvrsn=8>

SG 13	Mandatory	Descriptive	PRI 1
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SG 13.1 Indicate whether the organisation undertakes scenario analysis and/or modelling and provide a description of the scenario analysis (by asset class, sector, strategic asset allocation, etc.).

- Yes, to assess future ESG factors

Describe	We risk screen our listed equity holdings based on a number of ESG factors and form a view on our material counters based on the signal provided which may either related to a valuation proposal for the investment team or may relate to engagement.
----------	--
- Yes, to assess future climate-related risks and opportunities

Describe	We assess the carbon footprint of our listed equity products and constantly assessing and looking into data providers specializing in the low carbon economy. Additionally, we map our FUM and impact at work in the green economy. We are working on a capability to develop a low-carbon themed fund.
----------	---
- No, not to assess future ESG/climate-related issues

SG 13.2 Indicate if your organisation considers ESG issues in strategic asset allocation and/or allocation of assets between sectors or geographic markets.

We do the following

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

SG 14	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1
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SG 15	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1
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Private

SG 16	Mandatory	Descriptive	General
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SG 16.1 Describe how you address ESG issues for internally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.

Asset Class	Describe what processes are in place and the outputs or outcomes achieved
Property	Our process involves due diligence on direct property investments, which include an analysis of ESG risks and opportunities. We also require environmental impact assessments. In the construction and development phase, we require assessments of energy efficiency strategies so as to reduce future maintenance and resources costs, and to protect against costs of potential regulatory changes requiring retrofitting and refurbishment. Where properties are already developed, we require managers to consider the long-term financial benefits of retrofitting and refurbishment to improve energy efficiency. This is relevant given the long-term and illiquid nature of these investments.
Hedge funds - DDQ	<div style="border: 1px solid black; padding: 5px;"> <p>Select whether you have responded to the PRI Hedge Fund DDQ</p> <p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> </div>
Hedge funds	We are looking to implement this in 2019
Money market instruments	We are looking to implement this in 2019

SG 18	Voluntary	Descriptive	General
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Private

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

Selection, Appointment and Monitoring	
Do you disclose?	
<input checked="" type="radio"/> We do not disclose to either clients/beneficiaries or the public. <input type="radio"/> We disclose to clients/beneficiaries only. <input type="radio"/> We disclose to the public	
Listed equity - Incorporation	
Do you disclose?	
<input type="radio"/> We do not proactively disclose it to the public and/or clients/beneficiaries <input type="radio"/> We disclose to clients/beneficiaries only. <input checked="" type="radio"/> We disclose it publicly	
The information disclosed to clients/beneficiaries is the same	
<input checked="" type="radio"/> Yes <input type="radio"/> No	
Disclosure to public and URL	
Disclosure to public and URL	
<input checked="" type="radio"/> Broad approach to ESG incorporation <input type="radio"/> Detailed explanation of ESG incorporation strategy used	
Annually	
http://ww2.oldmutual.co.za/docs/default-source/old-mutual-south-africa/omig/omig-about-us/responsible-investments/responsible-investment-report--june-2017.pdf?sfvrsn=8 http://ww2.oldmutual.co.za/docs/default-source/old-mutual-south-africa/omig/omig-about-us/responsible-investments/responsible-investment-report--june-2017.pdf?sfvrsn=8	
Listed equity - Engagement	

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

Disclosure to public and URL	
Disclosure to public and URL	
<input checked="" type="checkbox"/>	Details on the overall engagement strategy
<input checked="" type="checkbox"/>	Details on the selection of engagement cases and definition of objectives of the selections, priorities and specific goals
<input checked="" type="checkbox"/>	Number of engagements undertaken
<input checked="" type="checkbox"/>	Breakdown of engagements by type/topic
<input type="checkbox"/>	Breakdown of engagements by region
<input checked="" type="checkbox"/>	An assessment of the current status of the progress achieved and outcomes against defined objectives
<input checked="" type="checkbox"/>	Examples of engagement cases
<input checked="" type="checkbox"/>	Details on eventual escalation strategy taken after the initial dialogue has been unsuccessful (i.e. filing resolutions, issuing a statement, voting against management, divestment etc.)
<input type="checkbox"/>	Details on whether the provided information has been externally assured
<input checked="" type="checkbox"/>	Outcomes that have been achieved from the engagement
<input type="checkbox"/>	Other information
Annually	
http://ww2.oldmutual.co.za/docs/default-source/old-mutual-south-africa/omig/omig-about-us/responsible-investments/10709-responsible-ownership-report-2017.pdf	

Listed equity – (Proxy) Voting

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

Disclosure to public and URL	
Disclosure to public and URL	
<input checked="" type="checkbox"/>	Disclose all voting decisions
<input type="checkbox"/>	Disclose some voting decisions
<input type="checkbox"/>	Only disclose abstentions and votes against management
Annually	
http://ww2.oldmutual.co.za/docs/default-source/old-mutual-south-africa/omig/omig-about-us/responsible-investments/10709-responsible-ownership-report-2017.pdf	
http://ww2.oldmutual.co.za/docs/default-source/old-mutual-south-africa/omig/omig-about-us/responsible-investments/listed-equity-proxy-voting-policy-february-2018.pdf	

Private equity

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

Disclosure to clients/beneficiaries

Disclosure to clients/beneficiaries
<input checked="" type="checkbox"/> ESG information in relationship to our pre-investment activities <input checked="" type="checkbox"/> ESG information in relationship to our post-investment monitoring and ownership activities <input checked="" type="checkbox"/> Information on our portfolio companies' ESG performance <input type="checkbox"/> Other
Ad-hoc/when requested

Infrastructure

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

Disclosure to clients/beneficiaries
<input checked="" type="checkbox"/> ESG information on how you select infrastructure investments <input checked="" type="checkbox"/> ESG information on how you monitor and manage infrastructure investments <input type="checkbox"/> Information on your infrastructure investments' ESG performance
Ad-hoc/when requested

Hedge Funds

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

SAM 01.1 Indicate which of the following ESG incorporation strategies you require your external manager(s) to implement on your behalf for all your listed equity and/or fixed income assets:

Active investment strategies

Active investment strategies	Listed Equity
Screening	<input type="checkbox"/>
Thematic	<input type="checkbox"/>
Integration	<input checked="" type="checkbox"/>
None of the above	<input type="checkbox"/>

Passive investment strategies

Passive investment strategies	Listed Equity
Screening	<input type="checkbox"/>
Thematic	<input type="checkbox"/>
Integration	<input type="checkbox"/>
None of the above	<input checked="" type="checkbox"/>

SAM 05.1 When monitoring managers, indicate which of the following types of responsible investment information your organisation typically reviews and evaluates

	LE
ESG objectives linked to investment strategy (with examples)	<input type="checkbox"/>
Evidence on how the ESG incorporation strategy(ies) affected the investment decisions and financial / ESG performance of the portfolio/fund	<input checked="" type="checkbox"/>
Compliance with investment restrictions and any controversial investment decisions	<input type="checkbox"/>
ESG portfolio characteristics	<input type="checkbox"/>
How ESG materiality has been evaluated by the manager in the monitored period	<input type="checkbox"/>
Information on any ESG incidents	<input type="checkbox"/>
Metrics on the real economy influence of the investments	<input type="checkbox"/>
PRI Transparency Reports	<input type="checkbox"/>
PRI Assessment Reports	<input type="checkbox"/>
RI-promotion and engagement with the industry to enhance RI implementation	<input type="checkbox"/>
Changes to the oversight and responsibilities of ESG implementation	<input type="checkbox"/>
Other general RI considerations in investment management agreements; specify	<input type="checkbox"/>
None of the above	<input type="checkbox"/>

SAM 05.2 When monitoring external managers, does your organisation set any of the following to measure compliance/progress

	LE
ESG score	<input type="checkbox"/>
ESG weight	<input type="checkbox"/>
ESG performance minimum threshold	<input type="checkbox"/>
Real world economy targets	<input type="checkbox"/>
Other RI considerations	<input type="checkbox"/>
None of the above	<input checked="" type="checkbox"/>

Private

SAM 09.1

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

Add Example 1

Topic or issue	Annual ESG review of managers in report back
Conducted by	Internal staff
Asset class	Listed Equity
Scope and process	Guidelines on ESG Integration
Outcomes	Guidelines on ESG Integration

Add Example 2

Add Example 3

Add Example 4

Add Example 5

Add Example 6

Add Example 7

We are not able to provide examples

LEI 01.1 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%)

- Screening alone (i.e. not combined with any other strategies)
 - Thematic alone (i.e. not combined with any other strategies)
 - Integration alone (i.e. not combined with any other strategies)
 - Screening and integration strategies
 - Thematic and integration strategies
 - Screening and thematic strategies
 - All three strategies combined
- | | |
|---|------|
| Percentage of active listed equity to which the strategy is applied | 100% |
|---|------|
- We do not apply incorporation strategies

LEI 01.3 If assets are managed using a combination of ESG incorporation strategies, briefly describe how these combinations are used. [Optional]

Yes, our organisation uses a combination of ESG incorporation strategies across the various boutiques.

- Old Mutual Equities (OME) uses ESG ratings to sense-check the assumptions made in their fundamental company analysis and as a proxy measure of the quality of the company management in our factor model.
- Macrosolutions (MS) - from a top-down, or macro-thematic perspective, our lens is wide enough to capture ESG-driven trends that are impacting the investment arena. From a bottom-up perspective, our analysts incorporate ESG-related risks and opportunities into their fundamental valuations in so far as they will materially affect the long-term value of a share. To establish these impacts our analysts have access to ESG-specific data and ratings provided by MSCI.
- Customised Solutions (CS): Our commitment to responsible investment involves examining appropriate mechanisms to integrate relevant and material environmental, social and governance (ESG) factors into our investment decision making processes. We are continuously investigating the potential value of integrating ESG into our investment process.
- Futuregrowth: <http://www.futuregrowth.co.za/responsible-investing?sessionGUID=d80271d1-e519-7c97-58e8-e28b4c866b40&webSyncID=130d6064-67a3-e575-4497-9ca801aec62c&sessionGUID=d80271d1-e519-7c97-58e8-e28b4c866b40>

For further info, see link below:
<http://ww2.oldmutual.co.za/old-mutual-investment-group/boutiques>

LEI 02	Voluntary	Additional Assessed	PRI 1
Private			

LEI 03	Voluntary	Additional Assessed	PRI 1
Private			

LEI 04.1 Indicate and describe the type of screening you apply to your internally managed active listed equities.

- Negative/exclusionary screening
 - Product
 - Activity
 - Sector
 - Country/geographic region
 - Environmental and social practices and performance
 - Corporate governance

Description
An example would be Sharia investing which is a set of principles that govern Islamic investment funds and prohibit certain types of investment that aren't in line with Islamic beliefs such as alcohol, tobacco and pornography. In addition to this, other examples of exclusionary screening funds include the ESG local Responsible Investment portfolio, ESG Feeder Funds – moreover, the RI team is also working on a ESG Domestic Active Fund.

- Positive/best-in-class screening
 - Product
 - Activity
 - Sector
 - Country/geographic region
 - Environmental and social practices and performance
 - Corporate governance

Description
Best rated ESG companies per sector for local RI Funds. Our Proprietary ESG Risk model scores used across our fundamental and active quant funds. ESG Leaders Indexation funds.

- Norms-based screening

LEI 04.2	Describe how you notify clients and/or beneficiaries when changes are made to your screening criteria.		
	Publicly disclosed in our policy and annual reports		
LEI 05	Mandatory	Core Assessed	PRI 1
LEI 05.1	Indicate which processes your organisation uses to ensure screening is based on robust analysis.		
	<input checked="" type="checkbox"/> Comprehensive ESG research is undertaken or sourced to determine companies' activities and products. <input type="checkbox"/> Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies <input checked="" type="checkbox"/> External research and data used to identify companies to be excluded/included is subject to internal audit by ESG/RI staff, the internal audit function or similar <input checked="" type="checkbox"/> Third-party ESG ratings are updated regularly to ensure that portfolio holdings comply with fund policies. <input type="checkbox"/> Trading platforms blocking / restricting flagged securities on the black list <input checked="" type="checkbox"/> A committee or body with representatives independent of the individuals who conduct company research reviews some or all screening decisions <input checked="" type="checkbox"/> A periodic review of the quality of the research undertaken or provided is carried out <input checked="" type="checkbox"/> Review and evaluation of external research providers <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above		
LEI 05.2	Indicate the proportion of your actively managed listed equity portfolio that is subject to comprehensive ESG research as part your ESG screening strategy.		
	<input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90%		
LEI 05.3	Indicate how frequently third party ESG ratings are updated for screening purposes.		
	<input checked="" type="radio"/> Quarterly or more frequently <input type="radio"/> Bi-annually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually		
LEI 05.4	Indicate how frequently you review internal research that builds your ESG screens.		
	<input checked="" type="radio"/> Quarterly or more frequently <input type="radio"/> Bi-annually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually		
LEI 05.5	Additional information. [Optional]		
	<p>Listed below is the Active Listed Equity process highlighting the ESG integration process.</p> <ol style="list-style-type: none"> 1. ESG risk screening 2. Fundamentals ESG Research 3. Categorise/Dimension ESG Risk 4. Integrate ESG into Valuation/Portfolio considerations 5. Proxy Voting Company/Market Engagement 		
LEI 06	Voluntary	Additional Assessed	PRI 1
	Private		
LEI 07	Mandatory	Descriptive	PRI 1
LEI 07.1	Indicate the type of sustainability thematic funds or mandates your organisation manages.		
	<input checked="" type="checkbox"/> Environmentally themed funds <input checked="" type="checkbox"/> Socially themed funds <input checked="" type="checkbox"/> Combination of themes		
LEI 07.2	Describe your organisation's processes relating to sustainability themed funds. [Optional]		
	Currently these themes are consequence of the funds being tilted towards better rated ESG companies.		
LEI 08	Mandatory	Core Assessed	PRI 1

LEI 08.1	Indicate the ESG factors you systematically research as part of your investment analysis and the proportion of actively managed listed equity portfolios that is impacted by this analysis.	
ESG issues	Proportion impacted by analysis	
Environmental	Environmental	<input checked="" type="checkbox"/> <10% <input type="checkbox"/> 10-50% <input type="checkbox"/> 51-90% <input type="checkbox"/> >90%
	Social	<input checked="" type="checkbox"/> <10% <input type="checkbox"/> 10-50% <input type="checkbox"/> 51-90% <input type="checkbox"/> >90%
Corporate Governance	Corporate Governance	<input type="checkbox"/> <10% <input checked="" type="checkbox"/> 10-50% <input type="checkbox"/> 51-90% <input type="checkbox"/> >90%

LEI 09	Mandatory	Core Assessed	PRI 1
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LEI 09.1 Indicate which processes your organisation uses to ensure ESG integration is based on a robust analysis.

- Comprehensive ESG research is undertaken or sourced to determine companies' activities and products
- Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- Third-party ESG ratings are updated regularly.
- A periodic review of the internal research is carried out
- Structured, regular ESG specific meetings between responsible investment staff and the fund manager or within the investments team
- ESG risk profile of a portfolio against benchmark
- Analysis of the impact of ESG factors on investment risk and return performance
- Other, specify
The RI team has developed a proprietary ESG risk screening tool. -- integration flow diagram
- None of the above

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

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

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

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

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

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

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

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

None of the above

LEI 10	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 1
<i>Private</i>			
LEI 11	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1
<i>Private</i>			
LEI 12	Voluntary	Descriptive	PRI 1
<i>Private</i>			
LEI 13	Voluntary	Descriptive	PRI 1
<i>Private</i>			

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

Yes

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

Attachment provided:

URL provided:

http://ww2.oldmutual.co.za/docs/default-source/old-mutual-south-africa/omig/omig-about-us/responsible-investments/listed_equity_stewardship_guidelines.pdf?sfvrsn=2

LEA 01.3 Indicate what your active engagement policy covers:

General approach to active ownership

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

Engagement

- ESG issues
- Prioritisation of engagement
- Method of engagement
- Transparency of engagement activities
- Due diligence and monitoring process
- Insider information
- Escalation strategies
- Service Provider specific criteria
- Other specify;

(Proxy) voting approach

Voting

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

Other

None of the above

No

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

Yes

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

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

No

LEA 02.1 Indicate the method of engagement, giving reasons for the interaction.

Type of engagement	Reason for interaction
Individual / Internal staff engagements	<input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <input type="checkbox"/> We do not engage via internal staff
Collaborative engagements	<input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <input type="checkbox"/> We do not engage via collaborative engagements
Service provider engagements	<input type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues <input type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> To gain an understanding of ESG strategy and/or management <input checked="" type="checkbox"/> We do not engage via service providers

LEA 03.1 Indicate whether your organisation has a formal process for identifying and prioritising engagements.

Yes

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

Type of engagement	Criteria used to identify/prioritise engagements																														
Individual / Internal engagements	<table border="1"> <thead> <tr> <th colspan="2">Internal / Individual engagements</th> </tr> </thead> <tbody> <tr> <td><input type="checkbox"/></td> <td>Geography / market of the companies</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Materiality of the ESG factors</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Exposure (size of holdings)</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Responses to ESG impacts that have already occurred</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Responses to divestment pressure</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Consultation with clients/beneficiaries</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Consultation with other stakeholders (e.g. NGOs, trade unions, etc.)</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Follow-up from a voting decision</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Client request</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Breaches of international norms</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Other, specify</td> </tr> <tr> <td><input type="checkbox"/></td> <td>We do not outline engagement criteria for our individual engagements.</td> </tr> </tbody> </table>	Internal / Individual engagements		<input type="checkbox"/>	Geography / market of the companies	<input checked="" type="checkbox"/>	Materiality of the ESG factors	<input checked="" type="checkbox"/>	Exposure (size of holdings)	<input checked="" type="checkbox"/>	Responses to ESG impacts that have already occurred	<input type="checkbox"/>	Responses to divestment pressure	<input checked="" type="checkbox"/>	Consultation with clients/beneficiaries	<input checked="" type="checkbox"/>	Consultation with other stakeholders (e.g. NGOs, trade unions, etc.)	<input checked="" type="checkbox"/>	Follow-up from a voting decision	<input type="checkbox"/>	Client request	<input checked="" type="checkbox"/>	Breaches of international norms	<input type="checkbox"/>	Other, specify	<input type="checkbox"/>	We do not outline engagement criteria for our individual engagements.				
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<input type="checkbox"/>	Other, specify																														
<input type="checkbox"/>	We do not outline engagement criteria for our collaborative engagements.																														

No

LEA 04	Mandatory	Core Assessed	PRI 2
LEA 04.1 Indicate whether you define specific objectives for your organisation's engagement activities.			
Individual / Internal engagements	<input checked="" type="checkbox"/> All engagement activities <input type="checkbox"/> Majority of engagement activities <input type="checkbox"/> Minority of engagement activities <input type="checkbox"/> We do not define specific objectives for engagement activities carried out by internal staff.		
Collaborative engagements	<input checked="" type="checkbox"/> All engagement activities <input type="checkbox"/> Majority of engagement activities <input type="checkbox"/> Minority of engagement activities <input type="checkbox"/> We do not define specific objectives for engagement activities carried out through collaboration		
LEA 05	Mandatory	Core Assessed	PRI 2
LEA 05.1 Indicate if you monitor and/or review engagement outcomes.			
Individual / Internal engagements	<input checked="" type="checkbox"/> Yes, in all cases <input type="checkbox"/> Yes, in majority of cases <input type="checkbox"/> Yes, in a minority of cases <input type="checkbox"/> We do not monitor, or review engagement outcomes carried out by our internal staff.		
Collaborative engagements	<input checked="" type="checkbox"/> Yes, in all cases <input type="checkbox"/> Yes, in a majority of cases <input type="checkbox"/> Yes, in a minority of cases <input type="checkbox"/> We do not monitor, or review engagement outcomes via collaborative engagement activities.		
LEA 05.2 Indicate if you do any of the following to monitor and review the progress of engagement activities.			
Individual / Internal staff engagements	<input checked="" type="checkbox"/> Define timelines/milestones for your objectives <input checked="" type="checkbox"/> Track and/or monitor progress against defined objectives and/or KPIs <input checked="" type="checkbox"/> Track and/or monitor the progress of action taken when original objectives are not met <input checked="" type="checkbox"/> Revisit and, if necessary, revise objectives on continuous basis <input type="checkbox"/> Other; specify		
Collaborative engagements	<input checked="" type="checkbox"/> Define timelines/milestones for your objectives <input checked="" type="checkbox"/> Track and/or monitor progress against defined objectives and/or KPIs <input checked="" type="checkbox"/> Track and/or monitor the progress of action taken when original objectives are not met <input checked="" type="checkbox"/> Revisit and, if necessary, revise objectives on continuous basis <input type="checkbox"/> Other; specify		
LEA 06	Mandatory	Additional Assessed	PRI 2,4
LEA 06.1 Indicate whether your organisation has an escalation strategy when engagements are unsuccessful.			
<input checked="" type="checkbox"/> Yes			
LEA 06.2 Indicate the escalation strategies used at your organisation following unsuccessful engagements.			
<input checked="" type="checkbox"/> Collaborating with other investors <input checked="" type="checkbox"/> Issuing a public statement <input checked="" type="checkbox"/> Filing/submitting a shareholder resolution <input checked="" type="checkbox"/> Voting against the re-election of the relevant directors <input checked="" type="checkbox"/> Voting against the board of directors or the the annual financial report <input checked="" type="checkbox"/> Submitting nominations for election to the board <input type="checkbox"/> Seeking legal remedy / litigation <input type="checkbox"/> Reducing exposure (size of holdings) <input type="checkbox"/> Divestment <input type="checkbox"/> Other, specify			
<input type="checkbox"/> No			
LEA 07	Voluntary	Additional Assessed	PRI 1,2

LEA 07.1 Indicate whether insights gained from your organisation's engagements are shared with investment decision-makers.

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

LEA 07.2 Indicate the practices used to ensure information and insights collected through engagements are shared with investment decision-makers.

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

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

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

LEA 08 Mandatory Gateway PRI 2

LEA 08.1 Indicate if you track the number of your engagement activities.

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

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

Private

LEA 10 Voluntary Additional Assessed PRI 2

Private

LEA 11 Voluntary Descriptive PRI 2

Private

LEA 12 Mandatory Descriptive PRI 2

LEA 12.1 Indicate how you typically make your (proxy) voting decisions.

Approach
<input type="checkbox"/> We use our own research or voting team and make voting decisions without the use of service providers. <input checked="" type="checkbox"/> We hire service provider(s) who make voting recommendations and/or provide research that we use to guide our voting decisions.
Based on
<input type="checkbox"/> the service provider voting policy we sign off on <input checked="" type="checkbox"/> our own voting policy

- our clients' requests or policies
- other, explain
- We hire service provider(s) who make voting decisions on our behalf, except for some pre-defined scenarios where we review and make voting decisions.
- We hire service provider(s) who make voting decisions on our behalf.

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

We ensure this by reviewing the application of the (our) policy on an ad hoc basis.

LEA 14	Voluntary	Additional Assessed	PRI 2
Private			

LEA 15	Mandatory	Descriptive	PRI 2
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LEA 15.1 Indicate the proportion of votes where you or the service providers acting on your behalf have raised concerns with companies ahead of voting.

- 100%
- 99-75%
- 74-50%
- 49-25%
- 24-1%
- Neither we nor our service provider(s) raise concerns with companies ahead of voting

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

- 100%
- 99-75%
- 74-50%
- 49-25%
- 24-1%
- We do not communicate the rationale to companies
- Not applicable because we and/or our service providers do not abstain or vote against management recommendations

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

- Yes
- No

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

- We do track or collect this information

	Votes cast (to the nearest 1%)
100%	

	Specify the basis on which this percentage is calculated
--	--

- of the total number of ballot items on which you could have issued instructions
- of the total number of company meetings at which you could have voted
- of the total value of your listed equity holdings on which you could have voted
- We do not track or collect this information

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

- Yes, we track this information

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

Voting instructions Breakdown as percentage of votes cast	For (supporting) management recommendations
92%	
	Against (opposing) management recommendations
08%	
	Abstentions

0%
 No, we do not track this information

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

100

LEA 19 Mandatory Core Assessed PRI 2

LEA 19.1 Indicate whether your organisation has a formal escalation strategy following unsuccessful voting.

Yes
 No

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

- Contacting the company's board
- Contacting the company's senior management
- Issuing a public statement explaining the rationale
- Initiating individual/collaborative engagement
- Directing service providers to engage
- Reducing exposure (holdings) / divestment
- Other

LEA 20 Voluntary Descriptive PRI 2

Private

LEA 21 Voluntary Descriptive PRI 2

Private

PE 01	Voluntary	Descriptive	PRI 1-6
Private			
PE 02	Mandatory	Core Assessed	PRI 2
PE 02.1	Indicate whether your organisation's investment activities are guided by a responsible investment policy / follow responsible investment guidelines.		
<input checked="" type="checkbox"/> Our investment activities are guided by a responsible investment policy			
PE 02.2	Describe how your organisation outlines expectations on staff and portfolio companies' approach towards ESG issues in investment activities.		
We have embedded RI considerations in to the mandates of the investment committee members.			
<input type="checkbox"/> Our investment activities are not guided by a responsible investment policy <input type="checkbox"/> We do not have a responsible investment policy			
PE 05	Mandatory	Gateway	PRI 1
PE 05.1	During due-diligence indicate if your organisation typically incorporates ESG issues when selecting private equity investments.		
<input checked="" type="checkbox"/> Yes			
PE 05.2	Describe your organisation's approach to incorporating ESG issues in private equity investment selection.		
ESG risks are classified as High/Medium/Low risks based on sector and geographic location of the asset – when high risk issues are identified we typically appoint external ESG specialist to undertake detailed analysis of the issue/s - thereafter specific ESG issues are baked into the deal documentation.			
<input type="checkbox"/> No			
PE 06	Mandatory	Core Assessed	PRI 1,3
PE 06.1	Indicate what type of ESG information your organisation typically considers during your private equity investment selection process.		
<input checked="" type="checkbox"/> Raw data from target company <input type="checkbox"/> Benchmarks against other companies <input checked="" type="checkbox"/> Sector level data/benchmarks <input checked="" type="checkbox"/> Country level data/benchmarks <input checked="" type="checkbox"/> Reporting standards, industry codes and certifications <input checked="" type="checkbox"/> International initiatives, declarations or standards <input type="checkbox"/> Engagements with stakeholders (e.g. customers and suppliers) <input checked="" type="checkbox"/> Advice from external resources <input type="checkbox"/> Other, specify <input type="checkbox"/> We do not track this information			
PE 06.2	Describe how this information is reported to, considered and documented by the Investment Committee or similar.		
Each transaction proposal has within it an ESG section where deal specific ESG risk/opportunities are identified along with mitigation actions.			
PE 07	Voluntary	Additional Assessed	PRI 1,2
Private			
PE 08	Voluntary	Additional Assessed	PRI 1
Private			
PE 09	Mandatory	Gateway/Core Assessed	PRI 2
PE 09.1	Indicate whether your organisation incorporates ESG issues in investment monitoring of portfolio companies.		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
PE 09.4	Additional information. [Optional]		
We are in the process of formalising this across our portfolios.			
PE 13	Voluntary	Additional Assessed	PRI 2
Private			
PE 14	Voluntary	Additional Assessed	PRI 1,2
Private			
PE 15	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1,2
Private			

INF 01	Voluntary	Descriptive	PRI 1-6
Private			
INF 02	Mandatory	Core Assessed	PRI 1-6
INF 02.1	Indicate if your organisation has a responsible investment policy for infrastructure.		
<input type="radio"/> Yes <input checked="" type="radio"/> No			
INF 05	Mandatory	Gateway	PRI 1
INF 05.1	Indicate if your organisation typically incorporates ESG issues when selecting infrastructure investments.		
<input checked="" type="radio"/> Yes			
INF 05.2	Describe your organisation's approach to incorporating ESG issues in infrastructure investment selection.		
OMIG undertake ESG due diligence aligned with IFC performance standards, and build the outcomes into investment papers.			
<input type="radio"/> No			
INF 06	Voluntary	Descriptive	PRI 1,4
Private			
INF 07	Mandatory	Core Assessed	PRI 1,3
INF 07.1	Indicate which E, S and/or G issues are typically considered by your organisation in the investment selection process and list up to three typical examples per issue.		
<input checked="" type="checkbox"/> Environmental Whilst ESG issues are considered this is done on a project basis and not publicly disclosed.			
<input checked="" type="checkbox"/> Social Whilst ESG issues are considered this is done on a project basis and not publicly disclosed.			
<input checked="" type="checkbox"/> Governance Whilst ESG issues are considered this is done on a project basis and not publicly disclosed.			
INF 07.2	Additional information. [Optional]		
For more information on the OMIG approach to Infrastructure investing please see https://aiimafrica.com/			
INF 08	Voluntary	Additional Assessed	PRI 1,3
Private			
INF 09	Voluntary	Additional Assessed	PRI 1
Private			
INF 10	Mandatory	Core Assessed	PRI 4
INF 10.1	Indicate if your organisation includes ESG issues in your selection, appointment and/or monitoring of third-party operators.		
<input type="radio"/> Yes <input checked="" type="radio"/> No			
INF 11	Mandatory	Gateway	PRI 2
INF 11.1	Indicate whether your organisation and/or operators consider ESG issues in post-investment activities relating to your infrastructure assets.		
<input checked="" type="radio"/> Yes			
INF 11.2	Indicate how your organisation, and/or operators, considers ESG issues in the following post-investment activities relating to your infrastructure assets.		
<input checked="" type="checkbox"/> We consider ESG issues in the monitoring and operation of infrastructure <input checked="" type="checkbox"/> We consider ESG issues in infrastructure maintenance <input checked="" type="checkbox"/> We consider ESG issues in stakeholder engagements related to our infrastructure <input type="checkbox"/> We consider ESG issues in other post-investment activities, specify			
INF 11.3	Describe how your organisation, and/or operators, considers ESG issues in post-investment activities related to your infrastructure investments. [Optional]		
For more information please see the OMIG and AIIM sites: http://ww2.oldmutual.co.za/ https://aiimafrica.com/			
<input type="radio"/> No			

INF 12	Mandatory	Core Assessed	PRI 2
INF 12.1	Indicate the proportion of infrastructure assets for which your organisation and/or operators included ESG performance in investment monitoring during the reporting year.		
	<input type="radio"/> >90% of infrastructure assets <input type="radio"/> 51-90% of infrastructure assets <input checked="" type="radio"/> 10-50% of infrastructure assets <input type="radio"/> <10% of infrastructure assets		
INF 12.2	Indicate ESG issues for which your organisation, and/or operators, typically sets and monitors targets (KPIs or similar) and provide examples per issue.		
	<input checked="" type="checkbox"/> Environmental Whilst OMIG does set targets for projects they are not publicly available and are managed on a project by project basis. <input checked="" type="checkbox"/> Social Whilst OMIG does set targets for projects they are not publicly available and are managed on a project by project basis. <input checked="" type="checkbox"/> Governance Whilst OMIG does set targets for projects they are not publicly available and are managed on a project by project basis. <input type="checkbox"/> We do not set and/or monitor against targets		
INF 12.3	Additional information. [Optional]		
	For more information on our Infrastructure projects through OMIG please see the OMIG or AUJIM sites. http://ww2.oldmutual.co.za/ https://aiimafrika.com/		
INF 13	Mandatory	Additional Assessed	PRI 2
INF 13.1	Indicate whether you track the proportion of your infrastructure investees that have an ESG/sustainability-related policy (or similar guidelines).		
	<input type="radio"/> Yes <input checked="" type="radio"/> No		
INF 14	Voluntary	Descriptive	PRI 2,3
	Private		
INF 15	Mandatory	Core Assessed	PRI 2
INF 15.1	Indicate the proportion of active infrastructure maintenance projects where ESG issues have been considered.		
	<input type="radio"/> >90% of active maintenance projects <input type="radio"/> 51-90% of active maintenance projects <input type="radio"/> 10-50% of active maintenance projects <input checked="" type="radio"/> <10% of active maintenance projects <input type="radio"/> N/A, no maintenance projects of infrastructure assets are active		
INF 16	Voluntary	Additional Assessed	PRI 2
	Private		
INF 17	Voluntary	Additional Assessed	PRI 1,2
	Private		
INF 18	Voluntary	Descriptive	PRI 1-3
	Private		

CM1 01	Mandatory	Additional Assessed	General
CM1 01.1	Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:		
<input type="checkbox"/> Third party assurance over selected responses from this year's PRI Transparency Report <input type="checkbox"/> Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year <input type="checkbox"/> Third party assurance or audit of the correct implementation of RI processes (that have been reported to the PRI this year) <input type="checkbox"/> Internal audit of the correct implementation of RI processes and/or accuracy of RI data (that have been reported to the PRI this year) <input checked="" type="checkbox"/> Internal verification of responses before submission to the PRI (e.g. by the CEO or the board) <ul style="list-style-type: none"> <input type="radio"/> Whole PRI Transparency Report has been internally verified <input checked="" type="radio"/> Selected data has been internally verified <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above			
CM1 02	Mandatory	Descriptive	General
CM1 02.1	We undertook third party assurance on last year's PRI Transparency Report		
<input type="radio"/> Whole PRI Transparency Report was assured last year <input type="radio"/> Selected data was assured in last year's PRI Transparency Report <input checked="" type="radio"/> We did not assure last year's PRI Transparency report <input type="radio"/> None of the above, we were in our preparation year and did not report last year.			
CM1 03	Mandatory	Descriptive	General
CM1 03.1	We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:		
<input type="checkbox"/> We adhere to an RI certification or labelling scheme <input type="checkbox"/> We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report <input type="checkbox"/> ESG audit of holdings <input type="checkbox"/> Other, specify <input checked="" type="checkbox"/> None of the above			
CM1 04	Mandatory	Descriptive	General
CM1 04.1	Do you plan to conduct third party assurance of this year's PRI Transparency report?		
<input type="radio"/> Whole PRI Transparency Report will be assured <input type="radio"/> Selected data will be assured <input checked="" type="radio"/> We do not plan to assure this year's PRI Transparency report			
CM1 07	Mandatory	Descriptive	General
CM1 07.1	Indicate who has reviewed/verified internally the whole - or selected data of the - PRI Transparency Report . and if this applies to selected data please specify what data was reviewed		
<input type="checkbox"/> CEO or other Chief-Level staff <input type="checkbox"/> The Board <input type="checkbox"/> Investment Committee <input type="checkbox"/> Compliance Function <input checked="" type="checkbox"/> RI/ESG Team			
		What data has been verified	
<input checked="" type="checkbox"/> Policies <input checked="" type="checkbox"/> Overarching strategy and processes <input checked="" type="checkbox"/> Asset class specific processes <input checked="" type="checkbox"/> Quantitative data related to RI processes <input type="checkbox"/> Other			
		Relevant modules	
<input checked="" type="checkbox"/> Organisational Overview <input checked="" type="checkbox"/> Strategy and Governance <input checked="" type="checkbox"/> Indirect – Manager Selection, Appointment and Monitoring <input checked="" type="checkbox"/> Direct - Listed Equity Incorporation <input checked="" type="checkbox"/> Direct - Listed Equity Active Ownership <input checked="" type="checkbox"/> Direct – Private Equity			

- Direct - Infrastructure
- Investment Teams
- Legal Department
- Other (specify)

specify

FUM data reviewed by business Finance Directors

What data has been verified

- Policies
- Overarching strategy and processes
- Asset class specific processes
- Quantitative data related to RI processes
- Other

Relevant modules

- Organisational Overview
- Strategy and Governance
- Indirect – Manager Selection, Appointment and Monitoring
- Direct - Listed Equity Incorporation
- Direct - Listed Equity Active Ownership
- Direct – Private Equity
- Direct - Infrastructure