



PRIVATE RI REPORT

2020

RiverRock European Capital Partners LLP

About this report

This report is an export of the individual Signatory organisation responses to the PRI Reporting Framework during the 2020 reporting period. It shows your responses to all completed indicators, even those you chose to keep private. It is designed for your internal review or – if you wish - to share with your stakeholders. The PRI will **not publish** this report on its website. Instead, you will be able to access the public RI Transparency report of your organisation and that of other signatories on the [PRI website](#).

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

Understanding the Principles Index

The Principles Index summarises the response status for the individual indicators and modules and how these relate to the six [Principles for Responsible Investment](#). It can be used by stakeholders as an 'at a glance' summary of reported information and to identify particular themes or areas of interest.

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

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

Symbol	Status
✓	The signatory has completed all mandatory parts of this indicator
☑	The signatory has completed some parts of this indicator
🔒	This indicator was not relevant for this signatory
-	The signatory did not complete any part of this indicator.
🔍	The signatory has flagged this indicator for internal review

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

Principles Index

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

OO HF 01	Breakdown of hedge funds investments by strategies	🔒	n/a								✓
OO End	Module confirmation page	✓	-								

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

Direct - Fixed Income				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
FI 01	Incorporation strategies applied	✓	Public	✓						
FI 02	ESG issues and issuer research	✓	Private	✓						
FI 03	Processes to ensure analysis is robust	✓	Public	✓						
FI 04	Types of screening applied	✓	Public	✓						
FI 05	Examples of ESG factors in screening process	✓	Private	✓						
FI 06	Screening - ensuring criteria are met	✓	Public	✓						
FI 07	Thematic investing - overview	🔒	n/a	✓						
FI 08	Thematic investing - themed bond processes	🔒	n/a	✓						
FI 09	Thematic investing - assessing impact	🔒	n/a	✓						
FI 10	Integration overview	✓	Public	✓						
FI 11	Integration - ESG information in investment processes	✓	Public	✓						
FI 12	Integration - E,S and G issues reviewed	✓	Public	✓						
FI 13	ESG incorporation in passive funds	🔒	n/a	✓						
FI 14	Engagement overview and coverage	✓	Private		✓					
FI 15	Engagement method	✓	Private	✓	✓					
FI 16	Engagement policy disclosure	✓	Private	✓	✓					
FI 17	Financial/ESG performance	✓	Private							✓
FI 18	Examples - ESG incorporation or engagement	✓	Private	✓	✓					
FI End	Module confirmation page	✓	-							

Direct - Infrastructure				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
INF 01	Description of approach to RI	✓	Private	✓					✓	
INF 02	Responsible investment policy for infrastructure	✓	Public	✓					✓	
INF 03	Fund placement documents and RI	✓	Public	✓			✓		✓	
INF 04	Formal commitments to RI	✓	Private				✓			
INF 05	Incorporating ESG issues when selecting investments	✓	Public	✓						
INF 06	ESG advice and research when selecting investments	✓	Private	✓			✓			
INF 07	Examples of ESG issues in investment selection process	✓	Public	✓		✓				
INF 08	Types of ESG information considered in investment selection	✓	Private	✓		✓				
INF 09	ESG issues impact in selection process	✓	Private	✓						
INF 10	ESG issues in selection, appointment and monitoring of third-party operators	🔒	n/a				✓			
INF 11	ESG issues in post-investment activities	✓	Public		✓					
INF 12	Proportion of assets with ESG performance targets	✓	Public		✓					
INF 13	Proportion of portfolio companies with ESG/sustainability policy	✓	Public		✓					
INF 14	Type and frequency of reports received from investees	✓	Private		✓	✓				
INF 15	Proportion of maintenance projects where ESG issues were considered	✓	Public		✓					
INF 16	Proportion of stakeholders that were engaged with on ESG issues	✓	Private		✓					
INF 17	ESG issues affected financial/ESG performance	✓	Private	✓	✓					
INF 18	Examples of ESG issues that affected your infrastructure investments	✓	Private	✓		✓				
INF 19	Approach to disclosing ESG incidents	✓	Private						✓	
INF End	Module confirmation page	✓	-							

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

RiverRock European Capital Partners LLP

Reported Information

Private version

Organisational Overview

PRI disclaimer

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Basic information

OO 01

Mandatory

Public

Gateway/Peering

General

OO 01.1

Select the services and funds you offer

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

Further options (may be selected in addition to the above)

- ☐ Hedge funds
- ☐ Fund of hedge funds

OO 02

Mandatory

Public

Peering

General

OO 02.1

Select the location of your organisation's headquarters.

United Kingdom

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).
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	FTE
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50

OO 02.4	Additional information. [Optional]
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London Headquarters with a branch in Milan, Italy. Also Subsidiaries in Paris, Dublin, Luxembourg and Madrid.

OO 03	Mandatory	Public	Descriptive	General
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OO 03.1	Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.
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☐ Yes

☒ No

OO 04	Mandatory	Public	Gateway/Peering	General
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OO 04.1	Indicate the year end date for your reporting year.
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31/12/2019

OO 04.2	Indicate your total AUM at the end of your reporting year.
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Include the AUM of subsidiaries, but exclude advisory/execution only assets, and exclude the assets of your PRI signatory subsidiaries that you have chosen not to report on in OO 03.2

	trillions	billions	millions	thousands	hundreds
Total AUM			861	199	085
Currency	EUR				
Assets in USD			949	300	869

☐ Not applicable as we are in the fund-raising process

OO 04.4	Indicate the assets which are subject to an execution and/or advisory approach. Provide this figure based on the end of your reporting year
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☒ Not applicable as we do not have any assets under execution and/or advisory approach

OO 06	Mandatory	Public	Descriptive	General
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OO 06.1

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

☐ as percentage breakdown☒ as broad ranges

	Internally managed (%)	Externally managed (%)
Listed equity	0	0
Fixed income	>50%	0
Private equity	0	0
Property	0	0
Infrastructure	<10%	0
Commodities	0	0
Hedge funds	0	0
Fund of hedge funds	0	0
Forestry	0	0
Farmland	0	0
Inclusive finance	0	0
Cash	0	0
Money market instruments	0	0
Other (1), specify	0	0
Other (2), specify	0	0

OO 06.2

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

OO 06.3

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

☐ Yes☒ No

OO 06.5 Indicate whether your organisation uses fiduciary managers.

☐ Yes, we use a fiduciary manager and our response to OO 5.1 is reflective of their management of our assets.

☒ No, we do not use fiduciary managers.

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

RiverRock's asset management business operates predominantly private debt and credit strategies which are included in this reporting.

OO 07	Mandatory to Report Voluntary to Disclose	Private	Gateway	General
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OO 07.1 Provide to the nearest 5% the percentage breakdown of your Fixed Income AUM at the end of your reporting year, using the following categories.

Internally managed	SSA	0
	Corporate (financial)	0
	Corporate (non-financial)	100
	Securitised	0
	Total	100%

OO 09	Mandatory	Public	Peering	General
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OO 09.1 Indicate the breakdown of your organisation's AUM by market.

Developed Markets	100
Emerging Markets	0

	Frontier Markets
0	
	Other Markets
0	
	Total 100%
100%	

Asset class implementation gateway indicators

OO 10	Mandatory	Public	Gateway	General
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OO 10.1	Select the active ownership activities your organisation implemented in the reporting year.
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	Fixed income Corporate (non-financial) – engagement
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- ☒ We engage with companies on ESG factors via our staff, collaborations or service providers.
- ☐ We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.

OO 11	Mandatory	Public	Gateway	General
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OO 11.1	Select the internally managed asset classes in which you addressed ESG incorporation into your investment decisions and/or your active ownership practices (during the reporting year).
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	Fixed income - corporate (non-financial)
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- ☒ We address ESG incorporation.
- ☐ We do not do ESG incorporation.

	Infrastructure
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- ☒ We address ESG incorporation.
- ☐ We do not do ESG incorporation.

OO 12	Mandatory	Public	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.
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	Core modules
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- ☒ Organisational Overview
- ☒ Strategy and Governance

	RI implementation directly or via service providers
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	Direct - Fixed Income
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- ☒ Fixed income - Corporate (non-financial)

	Direct - Other asset classes with dedicated modules
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- ☒ Infrastructure

	Closing module
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- ☒ Closing module

Peering questions				
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OO FI 01	Mandatory to Report Voluntary to Disclose	Private	Gateway	General
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OO FI 01.1	Provide a breakdown of your internally managed fixed income securities by active and passive strategies
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Corporate (non-financial)		Passive
	0	
		Active - quantitative (quant)
	0	
		Active - fundamental and active - other
	100	
		Total
	100%	

OO FI 03	Mandatory	Public	Descriptive	General
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Update: this indicator has changed from "Mandatory to report, voluntary to disclose" to "Mandatory". **Your response to this indicator will be published in the Public Transparency Report.** This change is to enable improved analysis and peering.

If you are invested in private debt and reporting on ratings is not relevant for you, please indicate below

☒ OO FI 03.2 is not applicable as our internally managed fixed income assets are invested only in private debt.

OO INF 01	Mandatory to Report Voluntary to Disclose	Private	Descriptive	General
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OO INF 01.1 Indicate the level of ownership you typically hold in your infrastructure investments.

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

OO INF 02	Mandatory to Report Voluntary to Disclose	Private	Gateway/Peering	General
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OO INF 02.1 Provide a breakdown of your organisation's infrastructure assets based on who manages the assets.

Infrastructure assets managed by	Breakdown of your infrastructure assets (by number)
Managed directly by your organisation/companies owned by you	<input checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%
Managed via third-party operators appointed by your organisation/companies owned by you	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%
Managed by other investors/their third-party operators	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%
Total 100%	

OO INF 03	Mandatory to Report Voluntary to Disclose	Private	Descriptive	General
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Sector	Main infrastructure sectors (by AUM)
Largest infrastructure sector	<input type="radio"/> Transportation <input type="radio"/> Energy infrastructure <input type="radio"/> Conventional energy <input type="radio"/> Renewable energy <input type="radio"/> Water management <input type="radio"/> Waste management <input type="radio"/> Communication <input checked="" type="radio"/> Social infrastructure <input type="radio"/> Other, specify
Second largest infrastructure sector	<input type="radio"/> Transportation <input type="radio"/> Energy infrastructure <input type="radio"/> Conventional energy <input type="radio"/> Renewable energy <input type="radio"/> Water management <input type="radio"/> Waste management <input type="radio"/> Communication <input type="radio"/> Social infrastructure <input type="radio"/> Other, specify
Third largest infrastructure sector	<input type="radio"/> Transportation <input type="radio"/> Energy infrastructure <input type="radio"/> Conventional energy <input type="radio"/> Renewable energy <input type="radio"/> Water management <input type="radio"/> Waste management <input type="radio"/> Communication <input type="radio"/> Social infrastructure <input type="radio"/> Other, specify

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Reported Information

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Strategy and Governance

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Investment policy

SG 01

Mandatory

Public

Core Assessed

General

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

SG 01.1

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

☒ Yes

SG 01.2

Indicate the components/types and coverage of your policy.

Select all that apply

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

SG 01.3

Indicate if the investment policy covers any of the following

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

Other description (1)

When considering potential new investments, RiverRock's Portfolio Management teams shall endeavor to assess from a Responsible Investment perspective to identify material ESG risks and opportunities and potential consequent actions, prior to any commitment of capital. RiverRock has made clear that its funds will not invest in specific sectors.

☐ 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.

RiverRock takes its responsibilities as an investor seriously and views it as an evolving mission incorporating social and environmental impact in addition to corporate responsibility.

Our role as investors in the real economy, enabling critical infrastructure, supporting SMEs and catalysing businesses to help communities thrive, is one that requires an adherence to ESG principles to make us not just better investors, but better stewards of our assets. With a view to the future we are increasingly integrating climate risks (physical) and transition risks.

We define responsible investing as an approach to investing that aims to incorporate environmental, social and governance factors into investment decisions, allowing our strategies to better manage risk, generate sustainable, long-term returns and make a long-lasting contribution to society as a whole.

RiverRock's ESG Policy reflects our ethos and founding values. RiverRock was established in 2009 in the aftermath of the financial crisis to help ensure that lending to SMEs, which are the bedrock of the real economy, continued to function and to support long term sustainable growth and prosperity across Europe.

Investment teams share an acute awareness of their duties as stewards of our clients' assets and this perspective informs all of our investment decisions.

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]

RiverRock has implemented an integrated Environmental Social Management System ("ESMS") which outlines a set of management processes and procedures with regards to ESG-related matters. The ESMS is a firmwide effort ranging from our Senior Management, the portfolio managers, and each of the respective supporting functions. It aids in the identification, avoidance, minimisation, mitigation, offsetting and remedy of any environmental and social impacts inherent in its current and prospective investment portfolios.

Under our ESMS, each investment proposal undergoes scrutiny under a checklist where a total of 28 potential ESG-related risks are scored from 'low', 'medium' and 'high'. The existence of any 'high' ranking results in escalated discussions with the Head of Asset Management and the Chief Operating Officer. Investments with any identified 'high-risk' ESG-related factors at the proposal stage can only be approved under the condition that the appropriate risks and remedies for those risks are implemented.

As a long-term investor, RiverRock actively seeks out investments with the potential to make a positive impact on poverty, the environment and society as a whole, as we believe that these investments stand to outperform in the long term.

Furthermore, on an ongoing basis, RiverRock's ESMS requires the monitoring of the effectiveness of mitigated risks and remedies, as well as the identification of any new risks and impacts as they arise throughout portfolio construction.

Where RiverRock has a liquid strategy that is not a long term investment, the investment strategy itself adhere to the ESMS.

☐ No

SG 01 CC	Mandatory to Report Voluntary to Disclose	Private	Descriptive	General
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SG 01.6 CC	Indicate whether your organisation has identified transition and physical climate-related risks and opportunities and factored this into the investment strategies and products, within the organisation's investment time horizon.
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☒ Yes

	Describe the identified transition and physical climate-related risks and opportunities and how they have been factored into the investment strategies/products.
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As of 2019 we have begun to formally incorporate climate-related risks particularly as they are affecting our infrastructure investments and supply chains, with a view to physical and transition risks. We do so by including due diligence checks for strategies and policies pertaining to climate risks, and then engage with the managers to discuss these risks and how to mitigate them. We consider long term outcomes on the community. We avoid investments that have climate risks which cannot be mitigated or rectified, i.e. investing in areas which will be increasingly prone to severe flooding.

☐ No

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

	Describe the associated timescales linked to these risks and opportunities.
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As of 2019 we have begun to formally incorporate the identification and assessment of these risks into our investment process through KPIs and our engagement with managers. We will monitor the developments as part of our regular monitoring processes over the life of the investment, and this will factor into future investment decisions. For example, we have begun to ask about Climate Resilience Strategies and Environmental Management Systems and will see how the companies employing better practices will perform and react to climate risks. The timescale will be for the longterm from 2019--i.e. we are long term holders of assets and investors so we will track this and report over a multi-year engagement and want to engage with the community to understand their concerns and evolution and ability to adapt.

☐ No

SG 01.8 CC	Indicate whether the organisation publicly supports the TCFD?
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☐ Yes

☒ No

	Explain the rationale
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We have learned about the TCFD in 2019 and will consider its adoption into 2020, first building additional capacity and knowledge internally. We are already considering certain climate risks as part of our due diligence and investment process, and engagement with managers as described above. We understand that the strategy and governance indicators of the PRI's climate risk indicators are to become mandatory for signatories to report on from 2020.

**SG 01.9
CC**

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

☒ Yes

Describe

Yes, there is an ESG checklist for each investment, which highlights impacts on the environment, and KPIs that ask among other factors for managers' climate resilience strategies. This feeds into the investment decision making. For specific climate-related risks, these are flagged and additional research is done on the climate risks on site (i.e. water scarcity and our investment's effect on it if any) and followed over the life of the investment. We consider transition risk as important as well.

At our firmwide level we follow these same guidelines for our own corporate offices with a view to minimising our impact and only renting in locations which are not prone to major climatic disasters. These are discussed before any new building or rental agreement is signed.

☐ No

**SG 1.10
CC**

Indicate the documents and/or communications the organisation uses to publish TCFD disclosures.

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

SG 02

Mandatory

Public

Core Assessed

PRI 6

SG 02.1

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

- ☒ Policy setting out your overall approach

URL/Attachment

- ☒ URL

URL

<https://riverrock.eu/responsible-investing/>

- ☐ Attachment (will be made public)
- ☒ Formalised guidelines on environmental factors

	URL/Attachment
--	----------------

☒ URL

	URL
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<https://riverrock.eu/responsible-investing/>

☐ Attachment (will be made public)

☒ Formalised guidelines on social factors

	URL/Attachment
--	----------------

☒ URL

	URL
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<https://riverrock.eu/responsible-investing/>

☐ Attachment (will be made public)

☒ Formalised guidelines on corporate governance factors

	URL/Attachment
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☒ URL

	URL
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<https://riverrock.eu/responsible-investing/>

☐ Attachment (will be made public)

☐ Asset class-specific RI guidelines

☒ Screening / exclusions policy

	URL/Attachment
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☐ URL

☒ Attachment (will be made public)

	Attachment
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[File 1:AM006 ESG Policy.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

☒ Attachment

File Attachment

[AM006 ESG Policy.pdf \[598KB\]](#)

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

URL/Attachment

☐ URL

☒ Attachment

File Attachment

[AM006 ESG Policy.pdf \[598KB\]](#)

☒ Governance structure of organisational ESG responsibilities

URL/Attachment

☐ URL

☒ Attachment

File Attachment

[AM006 ESG Policy.pdf \[598KB\]](#)

☒ ESG incorporation approaches

URL/Attachment

☐ URL

☒ Attachment

File Attachment

[AM006 ESG Policy.pdf \[598KB\]](#)

☐ Active ownership approaches

☒ Reporting

URL/Attachment

☐ URL

☒ Attachment

File Attachment

[AM006 ESG Policy.pdf \[598KB\]](#)

☒ Climate change

URL/Attachment

☐ URL

☒ Attachment

File Attachment

[AM006 ESG Policy \(2\).pdf \[598KB\]](#)

☐ Other RI considerations, specify (1)

☐ We do not publicly disclose any investment policy components

SG 02.3	Additional information [Optional].
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our policy at the group and fund levels include environmental, climate change, social, corporate governance considerations--we publish a high level view on our website and the rest is available to investors and partners

SG 03	Mandatory	Public	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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All portfolio managers are required to disclose to the AIFM any and all directorship or holding in a company on an ongoing basis. This is an additional step put in place with the responsibility on the portfolio management team to disclose in addition to the due diligence analyses carried out by third-parties and the AIFM's compliance department. Should a conflict arise for an investee company, then this is to be disclosed to the investment committee to enable it to decide how the conflict is to be managed and will form part of the committee's decision-making process for approving the investment.

The AIFM also has a conflicts of interest policy describing how the firm deals with identifying and managing any conflicts that arise in the course of its business. The policy is reviewed by the AIFM on an annual basis. Any conflict is kept on the firm's conflicts register which details the potential conflict, the controls put in place to manage the conflict and the risk weighting that has been attributed to the conflict.

☐ No

SG 04	Voluntary	Private	Descriptive	General
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SG 04.1	Indicate if your organisation has a process for identifying and managing incidents that occur within investee entities.
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☒ Yes

☐ No

SG 04.2	Describe your process on managing incidents
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RiverRock's focus on long-term returns means that ESG considerations are incorporated into how we make investment decisions. This includes an ESG due diligence checklist during the origination, IC and execution stage, and there are KPIs attached to our investments linked to IRIS metrics, which are tracked over the life of the investment in our quarterly monitoring. Hence, if any incidents arise we are aware from the reporting and monitoring spot checks with the companies. For any issues identified via monitoring, the portfolio manager is the first port of call. Any issues relating to a portfolio company breach or worsening compliance with our ESG policy are escalated to the Chief Impact Officer and if they are not satisfactorily resolved against the requirements of this policy, is escalated to the Chief Operating Officer for determination on subsequent actions. The incidents are documented and tracked over time.

Objectives and strategies

SG 05	Mandatory	Public	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 05.2	Additional information. [Optional]
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The policy is reviewed at least on an annual basis, however given the importance of ESG in our investment process, in practice the policy is reviewed on an on-going basis, with revisions made as necessary to enhance our framework and respond to the needs and evolution of our investees. We are reviewing this more frequently also due to increasing transition and climate risks we are becoming aware of.

SG 06	Voluntary	Private	Descriptive	General
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SG 06.1	List the main responsible investment objectives that your organisation set for the reporting year.
----------------	--

Responsible investment processes

- ☐ Provide training on ESG incorporation
- ☒ Provide training on ESG engagement

Key performance indicator

Staff have capacity to understand and incorporate ESG checklist and material factors, engage with investees, and understand KPI links and SDGs incorporated across all funds.

Progress achieved

ESG checklist is understood by all PMs who can speak confidently about it (both internally and to investees) and our positive impacts towards the SDGs, and this is reported to the investment committee for all investments.

- ☒ Improved communication of ESG activities within the organisation

Key performance indicator

ESG Checklist produced and embedded in processes and reporting

Progress achieved

As we are doing this year in our marketing materials, investor outreach and PRI submission, we are improving how and what we communicate materially especially versus last year. The ESG checklist and linked KPIs have become embedded in the organisation and part of our regular communication internally and to investees and investors. Each portfolio management team must present the completed checklist to the fund's relevant Investment Committee confirming that a proposed transaction complies with the ESG Policy and questionable responses discussed/resolved. Failure to confirm that the proposed investment adheres to the ESG Policy may result in the investment committee rejecting the proposal.

- ☒ Improved engagement to encourage change with regards to management of ESG issues

Key performance indicator

Discussions with investees on ESG issues as per responses to checklist/KPIs

Progress achieved

This is a process of engagement we have begun in 2019, we can already say we have spoke about this with over ten current and potential investments, and is in continual evolution to be quantified through 2020.

- ☒ Improved ESG incorporation into investment decision making processes

Key performance indicator

New investment checklist process implemented from origination to monitoring, including confirmation of adherence to ESG Policy for each proposed fund investment.

Progress achieved

Each portfolio management team must follow the checklist during the deal origination, then present the checklist to the fund's relevant Investment Committee confirming that a proposed transaction complies with the ESG Policy. Failure to confirm that the proposed investment adheres to the ESG Policy may result in the investment committee rejecting the proposal.

Then this must be followed and reported on through the life of the investment. We are implementing this and it is in process as of 2019.

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

Financial performance of investments

- ☒ Increase portfolio performance by consideration of ESG factors

Key performance indicator

Long-term investment performances

Progress achieved

RiverRock believes that ESG factors can have a material impact on long-term investment outcomes. RiverRock is a long-term investor, and since ESG issues tend to evolve over a longer term, RiverRock considers such factors as a fundamental component of its investment process and tracks it over the life of the investment. RiverRock regards the inclusion of ESG issues in its investment views as part of its fiduciary responsibilities as well.

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

ESG characteristics of investments

- ☐ Over or underweight companies based on ESG characteristics
- ☒ Improve ESG ratings of portfolio

Key performance indicator

ESG integrated into Portfolio Manager responsibilities

Progress achieved

When considering potential new investments, RiverRock's Portfolio Management teams shall endeavour to assess from a Responsible Investment perspective to identify material ESG risks and opportunities and potential consequent actions, prior to any commitment of capital. These include exclusions and positive impacts attached to KPIs linked to the SDGs. The PM must not only track the ESG factors and report on them, but also align relevant factors to performance.

We use a strong exclusion list (see details in policy), which has been supplemented with integration of IRIS-linked indicators of impact and engagement, which the PM is responsible for on a day to day level.

- ☐ Setting carbon reduction targets for portfolio
- ☐ Other, specify (1)
- ☐ Other, specify (2)
- ☐ Other, specify (3)
- ☐ None of the above

Other activities

- ☒ Joining and/or participation in RI initiatives

Key performance indicator

Attending and promoting conferences on ESG related matters.

Progress achieved

Implementing ESG London 2019 is a full-day event targeted at hedge funds which are developing or considering developing an ESG policy and strategy to incorporate into their investment decision making process and hedge fund investors which intend to begin using or increase their use of ESG considerations as part of their hedge fund manager selection process.

- Insight into the hedge fund market point of view, adoption of ESG and what you should expect from investors on the subject
- Insight into how hedge funds can incorporate ESG data into their trading and investment decisions to generate alpha
- An understanding of where you can get high quality ESG data to help implement your ESG strategy and the leading responsible investment standards for hedge funds to engage with; and
- Lessons learned from hedge funds with established ESG policies to help you be better prepared.
- Partner speaking at international conference in Middle East this winter on our approach to ESG and trade finance.

- ☐ Encouraging others to join a RI initiative
- ☐ Documentation of best practice case studies
- ☒ Using case studies to demonstrate engagement and ESG incorporation to clients

Key performance indicator

Internal Corporate Social Responsibility actions

	Progress achieved
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We have taken notable steps this year to improve our own awareness internally of responsible business practices, more recycling and energy efficiency, improving diversity, and supporting our communities for example through a school internship program. We point to our 'before' and 'after' ESG integration as an evolving case study to potential partners, investors and investees as well as working on potential investees as a case study (i.e. counterparties that did not engage with ESG considerations before, but now thanks to RR are doing so). We also identified case studies on PRI, for example in infrastructure, to influence our behaviour.

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

Governance and human resources

SG 07	Mandatory	Public	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.
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	Roles
--	-------

- ☐ Board members or trustees
- ☒ 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
Head of Product Management

- ☒ Oversight/accountability for responsible investment
- ☒ Implementation of responsible investment
- ☐ No oversight/accountability or implementation responsibility for responsible investment
- ☒ Portfolio managers
 - ☒ Oversight/accountability for responsible investment
 - ☒ Implementation of responsible investment
 - ☐ No oversight/accountability or implementation responsibility for responsible investment
- ☒ Investment analysts
 - ☐ Oversight/accountability for responsible investment
 - ☒ Implementation of responsible investment
 - ☐ No oversight/accountability or implementation responsibility for responsible investment
- ☐ Dedicated responsible investment staff
- ☐ Investor relations
- ☐ Other role, specify (1)
- ☐ 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.

RiverRock's Chief Operating Officer and Chief Impact Officer (CIO) have overall responsibility for responsible investment activities as part of RiverRock's identified ESMS.

RiverRock's Head of Asset Management oversees the governance and management of responsible investment activities.

Head of Product Management works with the CIO to implement the ESG policy across the products.

Portfolio managers retain day-to-day responsibility for the implementation of responsible investment activities.

Each of RiverRock's support functions are actively involved in the identification, mitigation and monitoring of environmental and social risks in each of the firm's investment portfolio.

SG 07.3

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

Number

1

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

	Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Risk Officer (CRO), Investment Committee
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- ☒ Oversight/accountability for climate-related issues
- ☒ Assessment and management of climate-related issues
- ☐ No responsibility for climate-related issues

	Other Chief-level staff or heads of departments
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- ☒ Oversight/accountability for climate-related issues
- ☒ Assessment and management of climate-related issues
- ☐ No responsibility for climate-related issues

	Portfolio managers
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- ☒ Oversight/accountability for climate-related issues
- ☒ Assessment and management of climate-related issues
- ☐ No responsibility for climate-related issues

	Investment analysts
--	---------------------

- ☐ Oversight/accountability for climate-related issues
- ☒ Assessment and management of climate-related issues
- ☐ No responsibility for climate-related issues

	External managers or service providers
--	--

- ☒ Oversight/accountability for climate-related issues
- ☐ Assessment and management of climate-related issues
- ☐ No responsibility for climate-related issues

SG 07.7 CC	For management-level roles that assess and manage climate-related issues, provide further information on the structure and processes involved.
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The senior management of the firm are on the investment committee and all investments include an ESG section containing an ESG checklist inclusive of climate related risks/disclosures. As part of the committee's responsibilities, the investment pack is reviewed by the investment committee to approve or decline. Any questions are raised to the PM's to further investigate with the portfolio companies for clarity and risk avoidance. These are then taken up again by the IC for a decision on go/no go.

SG 08	Voluntary	Private	Additional Assessed	General
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SG 08.1	Indicate if your organisation's performance management, reward and/or personal development processes have a responsible investment element.
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	Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee
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SG 08.1a	RI in objectives, appraisal and/or reward
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- ☒ Responsible investment KPIs and/or goals included in objectives
- ☒ Responsible investment included in appraisal process
- ☐ Variable pay linked to responsible investment performance
- ☐ None of the above

SG 08.1b	RI in personal development and/or training plan
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- ☒ Responsible investment included in personal development and/or training plan
- ☐ None of the above

	Other C-level staff or head of department
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Head of Product Management

SG 08.1a	RI in objectives, appraisal and/or reward
-----------------	---

- ☒ Responsible investment KPIs and/or goals included in objectives
- ☒ Responsible investment included in appraisal process
- ☐ Variable pay linked to responsible investment performance
- ☐ None of the above

SG 08.1b	RI in personal development and/or training plan
-----------------	---

- ☒ Responsible investment included in personal development and/or training plan
- ☐ None of the above

	Portfolio managers
--	--------------------

SG 08.1a	RI in objectives, appraisal and/or reward
-----------------	---

- ☒ Responsible investment KPIs and/or goals included in objectives
- ☒ Responsible investment included in appraisal process
- ☐ Variable pay linked to responsible investment performance
- ☐ None of the above

SG 08.1b	RI in personal development and/or training plan
-----------------	---

- ☒ Responsible investment included in personal development and/or training plan
- ☐ None of the above

	Investment analysts
--	---------------------

SG 08.1a	RI in objectives, appraisal and/or reward
-----------------	---

- ☐ Responsible investment KPIs and/or goals included in objectives
- ☒ Responsible investment included in appraisal process
- ☐ Variable pay linked to responsible investment performance
- ☐ None of the above

SG 08.1b	RI in personal development and/or training plan
-----------------	---

- ☒ Responsible investment included in personal development and/or training plan
- ☐ None of the above

SG 08.3	Provide any additional information on your organisation's performance management, reward and/or personal development processes in relation to responsible investment.
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Internal and external training is provided and can be requested by any individual or by any team within the organisation.

Due to the fact that ESG forms part of the investment committee process, deals which do not conform to the policy will not be passed. Portfolio managers / Investment analysts are compensated on performance fees of the funds they run, which in turn are tied into the investments that the investment committee clears.

Promoting responsible investment

SG 09	Mandatory	Public	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.
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Select all that apply

- ☒ Principles for Responsible Investment

Your organisation's role in the initiative during the reporting period (see definitions)
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- ☒ Basic
- ☐ Moderate
- ☐ Advanced

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

We have begun to report to PRI two years ago and are ramping up our involvement and sophistication year on year vis-à-vis PRI, parallel to our increased engagement with our investees, and our own internal practices and capacity. Since last year, we have retained an established ESG and Impact Advisor to provide guidance, training, and internal capacity building across strategies, and through her support we are becoming more involved with the extent and detail of our PRI engagement, now increasingly referencing PRI guidance on specific investments/sectors (like infrastructure). We are also looking to the GIIN (and IRIS) for impact metrics and the UN Global Compact when it comes to norms on labour and human rights.

- ☐ Asian Corporate Governance Association
- ☐ Australian Council of Superannuation Investors
- ☐ AVCA: Sustainability Committee
- ☐ France Invest – La Commission ESG
- ☐ BVCA – Responsible Investment Advisory Board
- ☐ CDP Climate Change
- ☐ CDP Forests
- ☐ CDP Water
- ☒ CFA Institute Centre for Financial Market Integrity

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

- ☐ Basic
- ☒ Moderate
- ☐ Advanced
- ☐ Climate Action 100+
- ☐ Code for Responsible Investment in SA (CRISA)
- ☐ Council of Institutional Investors (CII)
- ☐ Eumedion
- ☐ Extractive Industries Transparency Initiative (EITI)
- ☐ ESG Research Australia
- ☐ Invest Europe Responsible Investment Roundtable
- ☐ Global Investors Governance Network (GIGN)
- ☒ Global Impact Investing Network (GIIN)

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

- ☒ Basic
- ☐ Moderate
- ☐ Advanced

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

We have been using GIIN research and impact investing knowledge to build our internal capacity, largely communicated by our ESG and Impact Advisor. We have also been using the GIIN IRIS indicators to inform our KPIs.

- ☐ Global Real Estate Sustainability Benchmark (GRESB)
- ☐ Green Bond Principles
- ☐ HKVCA: ESG Committee
- ☐ Institutional Investors Group on Climate Change (IIGCC)
- ☐ Interfaith Center on Corporate Responsibility (ICCR)
- ☐ International Corporate Governance Network (ICGN)
- ☐ Investor Group on Climate Change, Australia/New Zealand (IGCC)
- ☐ International Integrated Reporting Council (IIRC)
- ☐ Investor Network on Climate Risk (INCR)/CERES
- ☐ Local Authority Pension Fund Forum
- ☐ Principles for Financial Action in the 21st Century
- ☐ Principles for Sustainable Insurance
- ☐ Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify
- ☐ Responsible Finance Principles in Inclusive Finance
- ☐ Shareholder Association for Research and Education (Share)
- ☐ United Nations Environmental Program Finance Initiative (UNEP FI)
- ☒ United Nations Global Compact

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

- ☒ Basic
- ☐ Moderate
- ☐ Advanced

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

We use the UN Global Compact research and principles as guidance, especially on informing adherence to norms such as no child labour, environmental impacts, and human rights.

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

SG 10

Mandatory

Public

Core Assessed

PRI 4

SG 10.1

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

☒ Yes

SG 10.2

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

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

Description

For example: we have undertaken to improve our public disclosures and sharing of materials promoting RI on our website and through marketing material—these contain our approach and references/links to PRI.

We have spoken and put on events featuring our RI approach and references to groups like UN Global Compact and the norms they promote as well as UNPRI. These events or engagements are roughly once a quarter.

Frequency of contribution

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

Description

We speak about RI regularly and publicly at industry events (listed in the previous page) and encourage our counterparties to do so as well. We have undertaken to improve our public disclosures and sharing of materials promoting RI on our website and through marketing material—these contain our approach and references/links to PRI.

We have spoken and put on events featuring our RI approach and references to groups like UN Global Compact and the norms they promote as well as UNPRI. These events or engagements are roughly once a quarter.

Frequency of contribution

- ☒ Quarterly or more frequently
- ☐ Biannually
- ☐ Annually
- ☐ Less frequently than annually
- ☐ Ad hoc
- ☐ Other

- ☒ Spoke publicly at events and conferences to promote responsible investment

Description

Yes: most recently an event for the hedge fund industry, and a conference in the middle east where our senior partner spoke on ESG effects in the sector and our approach. We have spoken and put on events featuring our RI approach and references to groups like UN Global Compact and the norms they promote as well as UNPRI. These events or engagements are roughly once a quarter.

Frequency of contribution

- ☐ Quarterly or more frequently
- ☒ Biannually
- ☐ Annually
- ☐ Less frequently than annually
- ☐ Ad hoc
- ☐ Other

- ☐ Wrote and published in-house research papers on responsible investment
- ☒ Encouraged the adoption of the PRI

Description

We regularly engage with our investees both on an ad hoc and formal (quarterly) basis on financial monitoring during which we have begun to educate and capacitate on a peer to peer bases our counterparts on our impact KPIs and ESG considerations, risks and mitigating possibilities. They respond to these queries and come back to us for further detail, explanation and collaboration.

Frequency of contribution

- ☒ Quarterly or more frequently
- ☐ Biannually
- ☐ Annually
- ☐ Less frequently than annually
- ☐ Ad hoc
- ☐ Other

- ☐ Responded to RI related consultations by non-governmental organisations (OECD, FSB etc.)
- ☐ Wrote and published articles on responsible investment in the media
- ☐ A member of PRI advisory committees/ working groups, specify
- ☐ On the Board of, or officially advising, other RI organisations (e.g. local SIFs)
- ☐ Other, specify

☐ No

SG 10.3

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

We have taken notable steps this year to improve our own awareness internally of responsible business practices throughout our organisation, be it more recycling and energy efficiency for our buildings, improving diversity, and supporting our communities for example through a school internship program and other charitable/volunteering efforts-these echo the actions of a good corporate citizen which we are promoting.

SG 11

Voluntary

Private

Additional Assessed

PRI 4,5,6

SG 11.1

Indicate if your organisation - individually or in collaboration with others - conducted dialogue with public policy makers or regulators in support of responsible investment in the reporting year.

☒ Yes

If yes

- ☐ Yes, individually
- ☒ Yes, in collaboration with others

SG 11.2

Select the methods you have used.

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

SG 11.3

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

- ☐ Yes, publicly available
- ☒ No
- ☐ No

SG 11.4

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

We are foremost concerned with engaging on the forthcoming EC regulation on sustainability-related disclosures in the financial services, which aims to reduce information asymmetries in principal-agent relationships with regard to the integration of sustainability risk, the consideration of adverse sustainability impacts, the promotion of environmental or social characteristics (impacts), and sustainable investment, by requiring financial market participants and financial advisers to make pre-contractual and ongoing disclosures to end investors. We have engaged with our legal and fiduciary counterparts and ESG advisor on the matter, all of whom are one step closer to the regulators, and in our case the FCA. As we expect this will touch our industry and we want to be well positioned to help ourselves and others to comply.

Outsourcing to fiduciary managers and investment consultants

SG 12**Mandatory****Public****Core Assessed****PRI 4**

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

SG 12.1

Indicate whether your organisation uses investment consultants.

- ☒ Yes, we use investment consultants

SG 12.4

Indicate whether you use investment consultants for any the following services. Describe the responsible investment components of these services.

- ☐ Custodial services
- ☒ Investment policy development

Describe how responsible investment is incorporated

We have used an investment consultant who became a senior advisor to us on ESG and Impact. We had drafted an investment policy which was revised and expanded with her help. RI is both in our core mission statement (see website for example) as well as separate policies pertaining to RI. RiverRock is continuously seeking to integrate responsible investment into all aspects of the firm. Seeking independent advice is a core part of this effort.

- ☐ Strategic asset allocation
- ☒ Investment research

Describe how responsible investment is incorporated

Our investment consultant, specifically the Senior ESG and Impact Advisor, keeps us up to date on sector insights, regulatory points, and investment-specific materials, so that we can integrate impacts as well as ESG factors on both a regular and ad hoc basis. This includes SDG links, IRIS-tied indicators, and updating our policies or approaches to our investees accordingly. These are integrated into our investment processes and best practices identified for the

corporate world (like recycling etc) are put into practice in our day to day.

Other investment consultants, sector specific, also inform us on ESG developments they are made aware of that we can integrate into our investment considerations.

- ☐ Other, specify (1)
- ☐ Other, specify (2)
- ☐ Other, specify (3)
- ☐ None of the above
- ☐ No, we do not use investment consultants.

ESG issues in asset allocation

SG 13	Mandatory	Public	Descriptive	PRI 1
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SG 13.1	Indicate whether the organisation carries out scenario analysis and/or modelling, and if it does, provide a description of the scenario analysis (by asset class, sector, strategic asset allocation, etc.).
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- ☐ Yes, in order to assess future ESG factors
- ☐ Yes, in order to assess future climate-related risks and opportunities
- ☒ No, our organisation does not currently carry out scenario analysis and/or modelling

SG 13.3	Additional information. [OPTIONAL]
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We are currently in collecting data phase, which will allow us in the future to do more scenario analysis and modelling, where factors like deeper climate risks, demographic changes, etc. can be incorporated.

SG 14	Mandatory to Report Voluntary to Disclose	Private	Additional Assessed	PRI 1
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SG 14.1	Some investment risks and opportunities arise as a result of long term trends. Indicate which of the following are considered.
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- ☒ Changing demographics
- ☒ Climate change
- ☒ Resource scarcity
- ☒ Technological developments
- ☐ Other, specify(1)
- ☐ Other, specify(2)
- ☐ None of the above

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

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

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

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

SG 14.5	Additional information [Optional]
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For example, we screen for Climate Resilience strategies among our investees, indicating whether the organization implements a strategy to address the effects of climate change on the organization's operations. We also consider energy conservation, water usage, GHG emissions and energy efficiency improvements-all of which are linked to climate.

SG 14 CC	Voluntary	Private	General
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SG 14.6 CC	Provide further details on the key metric(s) used to assess climate-related risks and opportunities.
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Metric Type	Coverage	Purpose	Metric Unit	Metric Methodology
Exposure to carbon-related assets	<input type="checkbox"/> All assets <input type="checkbox"/> Majority of assets <input checked="" type="checkbox"/> Minority of assets	Check for climate risks and exposure to ensure we can protect our assets on the downside and be supportive of best in class performers	Climate resilience strategy Energy conservation strategy Environmental management system Environmental policies for financial services clients GHG Emissions Water used: high water stress regions Water conservation strategy GHG emissions of product for sale Energy efficiency improvements	IRIS indicators

**SG 14.8
CC**

Indicate whether climate-related risks are integrated into overall risk management and explain the risk management processes used for identifying, assessing and managing climate-related risks.

- ☒ Processes for climate-related risks are integrated into overall risk management

Please describe

As seen above, we have already identified a strong set of metrics around environment and climate for overall risk management and identifying climate-related risks among our investees. These are identified ex ante investment, discussed at Investment Committee level if red-flagged, and then monitored through the life of the investment. We are at the beginning of our ongoing integration of climate related risk management in terms of working with our investees to manage these risks, through better policies, more disclosures, and then concrete actions in terms of allocating assets and personnel.

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

**SG 14.9
CC**

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

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

SG 15

Mandatory to Report Voluntary to Disclose

Private

Descriptive

PRI 1

SG 15.1

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

- ☒ Yes

SG 15.2

Indicate the percentage of your total AUM invested in environmental and social themed areas.

%

15

SG 15.3

Specify which thematic area(s) you invest in, indicate the percentage of your AUM in the particular asset class and provide a brief description.

Area

☒ Energy efficiency / Clean technology

Asset class invested

- ☐ Fixed income - SSA
- ☐ Fixed income - Corporate (financial)
- ☐ Fixed income - Corporate (non-financial)
- ☐ Fixed income - Securitised
- ☒ Infrastructure

Percentage of AUM (+/-5%) per asset class invested in the area

8

Brief description and measures of investment

We have provided financing to companies which generate power using alternate means differentiating from fossil fuels as well as a company that uses technology to monitor the frequency of trash and recycling collections in cities to improve efficiencies and reduce GHG and increase circular economy principles. We believe these are essential in considering future and present physical climate risks, resilience, and considering transition risks. We measure the investments along the lines of our ESG checklist, KPIs linked to SDGs (including climate, employee treatment, governance factors).

☒ Renewable energy

Asset class invested

- ☐ Fixed income - SSA
- ☐ Fixed income - Corporate (financial)
- ☒ Fixed income - Corporate (non-financial)

Percentage of AUM (+/-5%) per asset class invested in the area

3

- ☐ Fixed income - Securitised
- ☐ Infrastructure

Brief description and measures of investment

Loan to a renewable energy company that installs solar panels on houses--we measure social metrics (employee treatment, diversity), governance, then company and environment specific: accessibility/cost, kWh (power) generated, displacement of fossil fuels, and track changes in regulation to make this more favourable considering transition risk

- ☐ Green buildings
- ☒ Sustainable forestry

Asset class invested

- ☐ Fixed income - SSA
- ☐ Fixed income - Corporate (financial)
- ☒ Fixed income - Corporate (non-financial)

Percentage of AUM (+/-5%) per asset class invested in the area

2

- ☐ Fixed income - Securitised
- ☐ Infrastructure

Brief description and measures of investment

Loan to a company that supplies wooden furniture from sustainable sources where we track social metrics (employee treatment, diversity), governance, then company and environment specific factors: tree types and growth rates, tree sustainability (species), company growth, geographic diversity, changes in resource needs for sustainable management.

- ☐ Sustainable agriculture
- ☐ Microfinance
- ☒ SME financing

Asset class invested

- ☐ Fixed income - SSA
- ☐ Fixed income - Corporate (financial)
- ☒ Fixed income - Corporate (non-financial)

Percentage of AUM (+/-5%) per asset class invested in the area

7

- ☐ Fixed income - Securitised
- ☒ Infrastructure

Percentage of AUM (+/-5%) per asset class invested in the area

8

Brief description and measures of investment

We have provided financing to companies which generate power using alternate means differentiating from fossil fuels as well as a company that uses technology to monitor the frequency of trash and recycling collections in cities to improve efficiencies and reduce GHG and increase circular economy principles. We believe these are essential in considering future and present physical climate risks, resilience, and considering transition risks. We measure the investments along the lines of our ESG checklist, KPIs linked to SDGs (including climate, employee treatment, governance factors).

☒ Social enterprise / community investing

Asset class invested

- ☐ Fixed income - SSA
- ☐ Fixed income - Corporate (financial)
- ☐ Fixed income - Corporate (non-financial)
- ☐ Fixed income - Securitised
- ☒ Infrastructure

Percentage of AUM (+/-5%) per asset class invested in the area

8

Brief description and measures of investment

There have been investments in police stations and hospitals around Europe, helping to maintain the local areas and supporting the local economy and keeping people safe and communities vibrant, we ascribe certain metrics to these factors including: climate resilience strategies, employee turnover, % of women employed, anti discrimination policies, community engagement strategies, among others. The total invested in these social investments is ca. 40mm EUR.

- ☐ Affordable housing
- ☐ Education
- ☒ Global health

Asset class invested

- ☐ Fixed income - SSA
- ☐ Fixed income - Corporate (financial)
- ☐ Fixed income - Corporate (non-financial)
- ☐ Fixed income - Securitised
- ☒ Infrastructure

Percentage of AUM (+/-5%) per asset class invested in the area

8

Brief description and measures of investment

Our investment in hospitals around Europe are centred on quality affordable and accessible services in a setting that is a well managed building with modern technology, run energy efficiently, helping to maintain the local areas and supporting the local economy and keeping people safe and communities vibrant, we ascribe certain metrics to these factors including: climate resilience strategies, employee turnover, % of women employed, anti discrimination policies, community engagement strategies, among others. The total invested in these social investments is ca. 40mm EUR (including other assets like police stations mentioned above).

- ☐ Water
- ☐ Other area, specify

☐ No

Innovation

SG 18	Voluntary	Private	Descriptive	General
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SG 18.1

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

☒ Yes

SG 18.2

Describe any specific features of your approach to responsible investment that you believe are particularly innovative.

Yes, we believe that we are unique in our approach that has begun to integrate climate and transition risks from a group strategy level into each of our investment themes and asset classes. Despite fixed income being challenging due to its shorter term holding periods and less direct influence on our investees than private equity, we engage throughout the investment process with the investee to monitor and evolve and consider more than the traditional ESG risks.

☐ No

Communication

SG 19	Mandatory	Public	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.

Fixed income

Do you disclose?

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

Disclosure to clients/beneficiaries	
	<div>Disclosure to clients/beneficiaries</div> <p> <input checked="" type="radio"/> Broad approach to RI incorporation <input type="radio"/> Detailed explanation of RI incorporation strategy used </p>
	<div>Frequency</div> <p> <input type="checkbox"/> Quarterly <input type="checkbox"/> Biannually <input checked="" type="checkbox"/> Annually <input type="checkbox"/> Less frequently than annually <input type="checkbox"/> Ad hoc/when requested </p>

	Infrastructure
	<div>Do you disclose?</div> <p> <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 </p>

Disclosure to clients/beneficiaries	
	<div>Disclosure to clients/beneficiaries</div> <p> <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 </p>
	<div>Frequency</div> <p> <input type="checkbox"/> Quarterly or more frequently <input type="checkbox"/> Biannually <input checked="" type="checkbox"/> Annually <input type="checkbox"/> Less frequently than annually <input type="checkbox"/> Ad-hoc/when requested </p>

SG 19.2	Additional information [Optional]
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We are committing to do so from 2020 on an annual basis where ESG/impact is incorporated.

RiverRock European Capital Partners LLP

Reported Information

Private version

Direct - Fixed Income

PRI disclaimer

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

ESG incorporation in actively managed fixed income

Implementation processes

FI 01	Mandatory	Public	Gateway	PRI 1
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FI 01.1

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

Corporate (non-financial)	Screening alone	0
	Thematic alone	0
	Integration alone	0
	Screening + integration strategies	100
	Thematic + integration strategies	0
	Screening + thematic strategies	0
	All three strategies combined	0
	No incorporation strategies applied	0
		100%

FI 01.2

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

RiverRock uses screening and integration approaches to ensure that there is a firmwide robust responsible investment approach. We use screening to ensure that none of our investments contradict our core principles and raises red flags nor are subject to exclusions. Similarly using integrated ESG approaches helps RiverRock to seek out investments with the potential to have a positive impact on poverty, the environment and society as a whole. We do this by integrating ESG into our investment process and give a better risk/return profile. It is our belief that such investments will often outperform in the long term.

FI 02

Mandatory to Report Voluntary to Disclose

Private

Core Assessed

PRI 1

FI 02.1

Indicate which ESG factors you systematically research as part of your analysis on issuers.

Select all that apply

			Corporate (non-financial)	
Environmental data		<input checked="" type="checkbox"/>		
Social data		<input checked="" type="checkbox"/>		
Governance data		<input checked="" type="checkbox"/>		

FI 02.2

Indicate what format your ESG information comes in and where you typically source it

☒ Raw ESG company data

Indicate who provides this information

- ☐ ESG research provider
- ☐ Sell-side
- ☐ In-house – specialised ESG analyst or team
- ☒ In-house – FI analyst, PM or risk team
- ☐ Other, specify

☒ ESG factor specific analysis

Indicate who provides this information

- ☐ ESG research provider
- ☐ Sell-side
- ☐ In-house – specialised ESG analyst or team
- ☒ In-house – FI analyst, PM or risk team
- ☐ Other, specify

☒ Issuer-level ESG analysis

Indicate who provides this information

- ☐ ESG research provider
- ☐ Sell-side
- ☐ In-house – specialised ESG analyst or team
- ☒ In-house – FI analyst, PM or risk team
- ☐ Other, specify
- ☒ Sector-level ESG analysis

Indicate who provides this information

- ☐ ESG research provider
- ☐ Sell-side
- ☐ In-house – specialised ESG analyst or team
- ☒ In-house – FI analyst, PM or risk team
- ☐ Other, specify
- ☒ Country-level ESG analysis

Indicate who provides this information

- ☐ ESG research provider
- ☐ Sell-side
- ☐ In-house – specialised ESG analyst or team
- ☒ In-house – FI analyst, PM or risk team
- ☐ Other, specify

FI 02.3

Provide a brief description of the ESG information used, highlighting any differences in sources of information across your ESG incorporation strategies.

The funds engage with third-parties who carry out due diligence on its analyses on target investee companies according to information from each category listed above. These differ based on the skillsets and specialties and proprietary data sources of the analysts, PMs and third parties. We use this ESG information to ensure potential investments are aligned to our internal policies and where possible also creating positive impacts. Such analyses are intended to highlight any concerns or issues faced by the investee company from a governance perspective as well and are presented to the investment committee of the AIFM as part of the consideration taken when approving proposed deals.

FI 03	Mandatory	Public	Additional Assessed	PRI 1
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FI 03.1

Indicate how you ensure that your ESG research process is robust:

- ☒ Comprehensive ESG research is undertaken internally to determine companies' activities; and products and/or services
- ☒ Issuers are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- ☒ Issuer information and/or ESG ratings are updated regularly to ensure ESG research is accurate
- ☐ Internal audits and regular reviews of ESG research are undertaken in a systematic way.
- ☐ A materiality/sustainability framework is created and regularly updated that includes all the key ESG risks and opportunities for each sector/country.
- ☒ Other, specify

	specify description
--	---------------------

A materiality/sustainability framework is created and regularly updated that includes all the key ESG risks and opportunities for each strategy (not differentiated by country)

☐ None of the above

FI 03.2	Describe how your ESG information or analysis is shared among your investment team.
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☐ ESG information is held within a centralised database and is accessible to all investment staff

☐ ESG information is displayed on front office research platforms

☒ ESG information is a standard item on all individual issuer summaries, research notes, 'tear sheets', or similar documents

☒ Investment staff are required to discuss ESG information on issuers as a standard item during investment committee meetings

☒ Records capture how ESG information and research was incorporated into investment decisions

☐ Other, specify

☐ None of the above

(A) Implementation: Screening

FI 04	Mandatory	Public	Gateway	PRI 1
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FI 04.1	Indicate the type of screening you conduct.
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Select all that apply

			Corporate (non-financial)	
Negative/exclusionary screening		<input checked="" type="checkbox"/>		
Positive/best-in-class screening		<input checked="" type="checkbox"/>		
Norms-based screening		<input checked="" type="checkbox"/>		

FI 04.2	Describe your approach to screening for internally managed active fixed income
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Riverrock has moved to an engagement and integration not just exclusion (screening) policy with companies we invest in to encourage and support them to adopt more rigorous ESG principals in their businesses. Our positive screening is done on an investment by investment basis, cross referencing the asset owner with those we identify as best-in-class ESG from public sources. For those not best in class, we want to engage and move the needle with those whom we work and improve them.

RiverRock will not invest in a company which:

- Has production or other activities that involve harmful or exploitative forms of forced labour or child labour; Produces any illegal products or engages in any illegal activities; Manufactures, distributes or sells arms or ammunitions primarily designed or primarily designated for military purposes; Manufactures or sells pornography; Is involved with products and activities that are banned as per global conventions and agreements, such as certain

pesticides/chemicals/wastes/ozone depleting substances and endangered or protected wildlife or products; involved in the supply or purchase of sanctioned products, goods to or from countries or regions covered by United Nations sanctions; and/or

- Is, in the opinion of RiverRock fund's Investment Committee, exploitative of vulnerable groups in society

FI 05	Voluntary	Private	Additional Assessed	PRI 1
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FI 05.1	Provide examples of how ESG factors are included in your screening criteria.
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☒ Example 1

Type of fixed income
<input checked="" type="checkbox"/> Corporate (non-financial)
ESG factors
<input checked="" type="checkbox"/> Environmental
<input checked="" type="checkbox"/> Social
<input checked="" type="checkbox"/> Governance
Screening
<input checked="" type="checkbox"/> Negative/ exclusionary
<input type="checkbox"/> Positive/ best-in-class
<input checked="" type="checkbox"/> Norms-based
Description of how ESG factors are used as the screening criteria
<p>For all of our strategies, including FI, we use norms-based screening and extensive exclusions as part of our first ESG check.</p> <p>For the Senior Loan Fund for example we also include screening like: Energy conservation strategy of potential/existing investees, water conservation strategy, hazardous waste avoided, GHG emissions, jobs created, client feedback, governance policies and local compliance, to ensure we are covering factors adhering to environmental, social, and governance principles.</p>

☐ Example 2

☐ Example 3

☐ Example 4

☐ Example 5

FI 06	Mandatory	Public	Core Assessed	PRI 1
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FI 06.1	Indicate which systems your organisation has to ensure that fund screening criteria are not breached in fixed income investments.
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Type of screening	Checks
Negative/exclusionary screening	<input checked="" type="checkbox"/> Analysis is performed to ensure that issuers meet screening criteria <input checked="" type="checkbox"/> We ensure that data used for the screening criteria is updated at least once a year. <input type="checkbox"/> Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria <input checked="" type="checkbox"/> Audits of fund holdings are undertaken yearly by internal audit or compliance functions <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above
Positive/best-in-class screening	<input type="checkbox"/> Analysis is performed to ensure that issuers meet screening criteria <input type="checkbox"/> We ensure that data used for the screening criteria is updated at least once a year. <input type="checkbox"/> Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria <input type="checkbox"/> Audits of fund holdings are undertaken yearly by internal audit or compliance functions <input type="checkbox"/> Other, specify <input checked="" type="checkbox"/> None of the above
Norms-based screening	<input checked="" type="checkbox"/> Analysis is performed to ensure that issuers meet screening criteria <input checked="" type="checkbox"/> We ensure that data used for the screening criteria is updated at least once a year. <input type="checkbox"/> Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria <input checked="" type="checkbox"/> Audits of fund holdings are undertaken yearly by internal audit or compliance functions <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above

(C) Implementation: Integration

FI 10	Mandatory	Public	Descriptive	PRI 1
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FI 10.1

Describe your approach to integrating ESG into traditional financial analysis.

ESG factors relevant to investment are considered from a risk management and an indicator of potential additional return perspective. The precise extent and nature of ESG analysis and how it influences financial analysis is determined at a portfolio manager level. As a result of this integrated analysis, where these ESG criteria directly affect traditional financial performance assessment, RiverRock management determine allocation and holding decisions accordingly.

FI 10.2

Describe how your ESG integration approach is adapted to each of the different types of fixed income you invest in.

Corporate (non-financial)

ESG factors relevant to investment are considered from a risk management and an indicator of return perspective. The precise extent and nature of ESG analysis and how it influences financial analysis is determined at a portfolio manager level. As a result of this integrated analysis, where these ESG criteria directly affect traditional financial performance assessment, RiverRock management determine allocation and holding decisions accordingly.

FI 11	Mandatory	Public	Core Assessed	PRI 1
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FI 11.1 Indicate how ESG information is typically used as part of your investment process.

Select all that apply

		Corporate (non-financial)	
ESG analysis is integrated into fundamental analysis	<input checked="" type="checkbox"/>		
ESG analysis is used to adjust the internal credit assessments of issuers.	<input checked="" type="checkbox"/>		
ESG analysis is used to adjust forecasted financials and future cash flow estimates.	<input type="checkbox"/>		
ESG analysis impacts the ranking of an issuer relative to a chosen peer group.	<input type="checkbox"/>		
An issuer's ESG bond spreads and its relative value versus its sector peers are analysed to find out if all risks are priced in.	<input type="checkbox"/>		
The impact of ESG analysis on bonds of an issuer with different durations/maturities are analysed.	<input checked="" type="checkbox"/>		
Sensitivity analysis and scenario analysis are applied to valuation models to compare the difference between base-case and ESG-integrated security valuation.	<input type="checkbox"/>		
ESG analysis is integrated into portfolio weighting decisions.	<input checked="" type="checkbox"/>		
Companies, sectors, countries and currency and monitored for changes in ESG exposure and for breaches of risk limits.	<input checked="" type="checkbox"/>		
The ESG profile of portfolios is examined for securities with high ESG risks and assessed relative to the ESG profile of a benchmark.	<input type="checkbox"/>		
Other, specify in Additional Information	<input checked="" type="checkbox"/>		

FI 11.2	Additional information [OPTIONAL]
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All of our funds invest into private debt and ESG is part of the process from origination to execution. We use ESG in our deal screening, identifying red flags and potential positive impacts. If the red flags cannot be rectified the opportunity is dropped. Hence this has a marginal effect on portfolios as the poor ESG performers are excluded ex ante. ESG issues are raised at the IC level and opined on by our ESG Advisor. We follow the ESG criteria and KPIs tied to impact (and the SDGs) through the life of the investment, monitoring quarterly and reporting annually. Performance and impacts in sectors are tracked, especially as they pertain to transition risks. Physical climate risks are also considered.

As part of our dd, first the ESG checklist is filled out for each deal ensuring adherence to our policy at the group and fund level and identifying any red flags. E, S and G all have a number of items that are reviewed, and each item is weighted. The weightings will vary depending on the type of fund. These weightings are then aggregated to come up with a final outcome and decision for each investment, which is then monitored and reported on throughout the life of the investment.

FI 12	Mandatory	Public	Additional Assessed	PRI 1
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FI 12.1	Indicate the extent to which ESG issues are reviewed in your integration process.
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	Environment	Social	Governance
Corporate (non-financial)	<input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all	<input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all	<input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all

FI 12.2	Please provide more detail on how you review E, S and/or G factors in your integration process.
---------	---

Corporate (non-financial)

ESG integration for means that E S and G factors are incorporated via indicators and checklist(s) into the investment process and into our investment analysis. We believe this is necessary to optimise the risk/return profile of each investment and for the portfolio ultimately.

As part of our dd, first the ESG checklist is filled out for each deal ensuring adherence to our policy at the group and fund level and identifying any red flags. E, S and G all have a number of items that are reviewed, and each item is weighted. The weightings will vary depending on the type of fund. These weightings are then aggregated to come up with a final outcome and decision for each investment, which is then monitored and reported on throughout the life of the investment.

Fixed income - Engagement

FI 14	Mandatory to Report Voluntary to Disclose	Private	Core Assessed	PRI 2
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FI 14.1	Indicate the proportion of your fixed income assets on which you engage. Please exclude any engagements carried out solely in your capacity as a shareholder.
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Category	Proportion of assets		
Corporate (non-financial)	<input checked="" type="radio"/> >50% <input type="radio"/> 26-50% <input type="radio"/> 5-25% <input type="radio"/> More than 0%, less than 5%		
	<table border="1"> <tr> <td>FI 14.2</td><td>Indicate your motivations for conducting engagement (Corporate, non-financial fixed income assets)</td></tr> </table>	FI 14.2	Indicate your motivations for conducting engagement (Corporate, non-financial fixed income assets)
	FI 14.2	Indicate your motivations for conducting engagement (Corporate, non-financial fixed income assets)	
<input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> To influence issuer practice (or identify the need to influence) on ESG issue			

FI 15	Mandatory to Report Voluntary to Disclose	Private	Additional Assessed	PRI 1,2
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New selection options have been added to this indicator. Please review your prefilled responses carefully.

FI 15.1	Indicate how you typically engage with issuers as a fixed income investor, or as both a fixed income and listed equity investor. (Please do not include engagements where you are both a bondholder and shareholder but engage as a listed equity investor only.)
---------	---

Select all that apply

Type of engagement			Corporate (non-financial)	
Individual/Internal staff engagements			<input checked="" type="checkbox"/>	
Collaborative engagements			<input checked="" type="checkbox"/>	
Service provider engagements			<input type="checkbox"/>	

FI 15.2	Indicate how your organisation prioritises engagements with issuers.
---------	--

Select all that apply

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

FI 15.3

Indicate when your organisation conducts engagements with issuers.

Select all that apply

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

FI 15.4

Indicate what your organisation conducts engagements with issuers on.

Select all that apply

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

FI 15.5

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

Select all that apply

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

FI 16	Mandatory to Report Voluntary to Disclose	Private	Additional Assessed	PRI 1,2
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FI 16.1	Indicate if your publicly available policy documents explicitly refer to fixed income engagement separately from engagements in relation to other asset classes.
----------------	--

☐ Yes

☒ No

FI 16.3	Additional information [OPTIONAL]
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The policy refers to all asset classes under the RiverRock banner, including Fixed Income.

Outputs and outcomes

FI 17	Mandatory to Report Voluntary to Disclose	Private	Additional Assessed	General
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FI 17.1

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

Select all that apply

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

FI 17.2

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

We measure this in several ways, namely our own evolution in assessing and analysing investments. ESG has added a new dimension particularly relevant for us on the risk side and we can measure changes in the portfolio based on revised risk allocations and return expectations.

We have redrafted our ESG policy this year and aligned KPIs linked to the SDGs, as well as defined what we want to achieve strategy by strategy (fund by fund) in terms of impact and risk management. So we are setting the baseline now and tracking how ESG and impact evolve through the over the duration the investments, and how ESG influences investment returns. We will use our internal analysis to correlate these to the financial performance. In terms of the portfolio risks, our investment thesis is that ESG does indeed affect risk, and well-managed can provide downside protection. We see how the responses of our managers also evolve over time and how this pertains to risk and returns we experience.

FI 18

Voluntary

Private

Descriptive

PRI 1,2

FI 18.1

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

☒ Example 1

	Type of fixed income
<input checked="" type="checkbox"/> Corporate (non-financial)	
	ESG issue and explanation
<p>Crucially, we have been able to collect significantly more information from our investees and about potential investments using an ESG lens, which helps us to manage risks, ideally optimize the risk/return profile, and have a view to climate risks. Through engagement we have helped our investees collect and share more information and also take social, governance and environmental risks into greater account. We expect that outcomes will be positively influenced over time as we have begun to incorporate ESG checks and impact KPIs only this year, this will be a longer lead time to affecting performance, which we are tracking. We expect performance overall to be better due to more transparency, attention to ESG, and being better corporate citizens on both our side and our clients.</p>	
	RI strategy applied
<input type="checkbox"/> Screening <input type="checkbox"/> Integration <input checked="" type="checkbox"/> Engagement	
	Impact on investment decision or performance
<p>Since 2019 we have begun a deeper process of engagement with our counterparties on ESG, meaning that we first walk them through our checklist then work with them to understand and improve their processes adhering to environmental norms, social (especially labour) and governance when possible. We encourage consideration and disclosure on climate risks and transition risk. We explain our evolving process and why this matters. This is ongoing and has already resulted in better quality and more disclosures from counterparties. It guides our decisions as if we identify red flags which can't be overcome we reject the investment. We expect it will improve performance.</p>	

- ☐ Example 2
- ☐ Example 3
- ☐ Example 4
- ☐ Example 5

RiverRock European Capital Partners LLP

Reported Information

Private version

Direct - Infrastructure

PRI disclaimer

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

Overview

INF 01	Voluntary	Private	Descriptive	PRI 1-6
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INF 01.1

Provide a brief overview of your organisation's approach to responsible investment in infrastructure where you have equity stakes.

It should be noted that RiverRock Brownfield Infrastructure Fund I ("RBIF I") exclusively invest in Public-Private Partnerships, which by essence, always has a 'service to the community' angle and this was one of the reasons for launching our vehicle, marrying financial and social returns.

In addition, RBIF I primarily targets social infrastructure: the portfolio to date includes police stations and a hospital with a pipeline under execution involving additional community based assets including energy efficiency projects.

From an ESG specific standpoint RiverRock's responsible investment approach to infrastructure is an integration throughout the investment process of top down ESG policy application and bottom up impact measurement. We apply our responsible investing principles from the identification of the investment opportunities to the long-term management of the assets. We are continuing to develop our metrics to reflect long term risks like physical climate risks and transition risks, and also identifying outcomes for the communities we serve.

As part of the Pre-Investment Process ("Origination"), the Investment Team identifies ESG red flags as well as potential areas of positive impact creation, and areas where a specific focus during the Due Diligence Phase should be undertaken-either to rectify the ESG red flags or reject the deal.

As part of its Investment Process, RiverRock has developed an ESG Due Diligence Checklist ("ESG DD Checklist"). The ESG DD Checklist is used to screen all investments and investees' adherence to ESG (i.e. checking for policies as well as concrete measures), without distinction by sector of activity or asset class; it is meant to help identify specific ESG issues and risks that are associated with the investments. The ESG DD Checklist template is a working document to support the due diligence and the key conclusions are presented in the investment paper done prior to the investment committee. Key conclusions of this work are presented in the investment paper.

The Investment Committee paper includes also potential risk mitigation steps where required on ESG red flags, so that ex-ante an action plan can be decided to solve the issue or if not possible then exclude the investment following the Investment Committee. The Investment Committee paper includes a specific ESG section presenting the key ESG matters and the mitigation plan. This section is an integral part of the Investment Committee materials. Hence conclusions should be acknowledged by the Investment Committee members and form an integral part of the Investment Decision.

A set of KPIs is also attached to each strategy (infrastructure in this case) linked to impact generation and is monitored annually. These are aligned to the ESG policy as from 2019. Our KPI tracking enables benchmarking and monitoring of the changes during the life of the asset.

During the Management Phase after investment execution, the ESG matters identified during the investment phase are integrated into the Asset Management Plan. On an annual basis, the RBIF I's Investment Team will undertake a close monitoring of the ESG issues and this is done throughout the life of the asset. The RBIF I's Investment Team is responsible for the monitoring of ESG matters and implementation of the ESG mitigation plan. ESG matters/improvements/mitigations are communicated to investors via the quarterly reports.

INF 02	Mandatory	Public	Core Assessed	PRI 1-6
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INF 02.1

Indicate if your organisation has a responsible investment policy for infrastructure.

☒ Yes

INF 02.2

Provide a URL if your policy is publicly available.

☐ No

INF 02.3	Additional information. [Optional]
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There is a specific ESG policy in place at firm level. Furthermore, the RiverRock' Brownfield Infrastructure Fund I's team has developed a specific document to detail the process of incorporating ESG into investment decision and monitoring on the investments. The Impact Officer is present in the investment committee and is responsible to verify the consistency of the ESG analysis. The ESG advisor also has a say pre-Investment Committee on individual deals.

Fundraising of infrastructure funds

INF 03	Mandatory	Public	Core Assessed	PRI 1,4,6
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INF 03.1	Indicate if your most recent fund placement documents (private placement memorandums (PPMs) or similar) refer to responsible investment aspects of your organisation.
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☒ Yes

INF 03.2	Indicate how your fund placement documents (PPMs or similar) refer to the following responsible investment aspects of your organisation:
-----------------	--

- ☒ Policy and commitment to responsible investment
- ☒ Approach to ESG issues in pre-investment processes
- ☒ Approach to ESG issues in post-investment processes

INF 03.3	Describe how your organisation refers to responsible investment for infrastructure funds in fund placement documents (PPMs or similar). [Optional]
-----------------	--

The key document in particular for fundraising and placement pre PPM is the Presentation to potential investors which incorporates a specific section on ESG, KPIs, and the RiverRock ESG Senior Advisor.

The other key documents such as ESG policies and Processes specific to the Infrastructure Fund are included in the data-room, which is accessible to any potential investor.

The PPM was finalised before the implementation of the ESG policy for the Firm and for the Infrastructure Fund so this does not today include our RI strategy however comes as a bundle with the other documents referencing our policy and approach.

All these documents form an integral part of the Funds Offering documents.

In addition to the Firm ESG policy, RiverRock refers to responsible investment specifically for infrastructure funds in the document called "RiverRock ESG RBIF Processes" (See attachment in previous question). We require our investees to report to us on ESG matters.

☐ No

☐ Not applicable as our organisation does not fundraise

INF 04	Voluntary	Private	Additional Assessed	PRI 4
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INF 04.1	Indicate whether your organisation makes formal commitments in fund formation contracts, Limited Partnership Agreements (LPAs) or in side letters relating to responsible investment in infrastructure when requested by clients.
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- ☐ We always make formal commitment to responsible investment in fund formation contracts, LPAs or side letters
- ☐ In a majority of cases we make formal commitment to responsible investment in fund formation contracts, LPAs or side letters
- ☐ In a minority of cases we make formal commitment to responsible investment in fund formation contracts, LPAs or side letters
- ☒ We do not make formal commitment to responsible investment in fund formation contracts, LPAs or side letters
- ☐ We do not make formal commitments to responsible investment in fund formation contracts, LPAs or side letters because our clients do not request us to do so

INF 04.2	Additional information.
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We did not make formal commitment to responsible investment in fund formation contracts, LPAs or side letters as the ESG and responsible investment policy was implemented after the formation of the Funds. Our commitments to responsible investment forms integral part of our funds marketing documents.

Pre-Investment (Selection)

INF 05	Mandatory	Public	Gateway	PRI 1
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INF 05.1	Indicate if your organisation typically incorporates ESG issues when selecting infrastructure investments.
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- ☒ Yes

INF 05.2	Describe your organisation's approach to incorporating ESG issues in infrastructure investment selection.
-----------------	---

At the Origination stage, a specific section for ESG risk is either incorporated in the Green Paper (Preliminary selection document) or a call is arranged with the ESG advisor to identify at an early stage any potential red flag. We consider climate risks and transition risks and favour investments that are greener with reduced risks around climate change.

A Due Diligence questionnaire with ESG criteria has been developed to support the due diligence and the key conclusions are presented in the investment paper. KPIs tied to potential positive (or negative) impacts of the investment are also filled in through an Excel.

As part of the Pre-Investment process our ESG Advisor reviews the deal for red flags.

At Investment Committee level the IC paper is presented to committed member plus Head of Risk and Impact Officer who performs an additional check.

- ☐ No

INF 06	Voluntary	Private	Descriptive	PRI 1,4
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INF 06.1	Indicate whether your organisation typically uses ESG advice and research sourced internally and/or externally when incorporating ESG issues into the infrastructure investment selection process.
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- ☒ Internal staff
- ☒ Specify role
 - Senior Advisor Dedicated to ESG
 - ☐ Specify role
 - ☐ Specify role
- ☒ External resources
- ☒ Environmental advisors
 - ☒ Social advisors
 - ☒ Corporate governance advisors
 - ☒ Regulatory and/or legal advisors
 - ☐ Other, specify type of advisors/roles
- ☐ No use of internal or external advice on ESG issues

INF 06.2	Additional information. [Optional]
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The organisation relies on internal and external research specific to our investments which detail ESG criteria as well as financial risks and opportunities. External Research includes infrastructure specialist publications (Infranews, IJ online, Infrastructure Investors), specialist group research (UN PRI and their dedicated infrastructure documents), advisors (rating agency, law firms, ...), guidance from impact investors (Sonnet, Blue Orchard) and competitors' public research.

INF 07	Mandatory	Public	Core Assessed	PRI 1,3
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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.
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ESG issues

- ☒ Environmental

List up to three typical examples of environmental issues

Water security: water consumption, water use and conservation strategies, drought prone areas

Carbon footprint by assessing CO2 emissions

Monitoring of energy consumption (including energy efficiency strategies) and if renewable energy is produced instead of with fossil fuels

- ☒ Social

List up to three typical examples of social issues
--

Employee rights (including collective bargaining agreements, fair compensation policies)

Community relations and communications (including if there's a community engagement strategy)

Policies for Employee Health and Safety

Policies for Employee Health and Safety – this aspect is crucial as our contractors are often construction companies.

☒ Governance

List up to three typical examples of governance issues

Board independence (number of independent directors)

Board structure (including diversity and gender representation)

Policies in place on corporate governance communicated to stakeholders

INF 08	Voluntary	Private	Additional Assessed	PRI 1,3
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INF 08.1	Indicate what type of ESG information your organisation typically considers during your infrastructure investment selection process.
----------	--

- ☒ Raw data from the target infrastructure asset/company
- ☒ Benchmarks/ratings against similar infrastructure asset
- ☐ Sector level data/benchmarks
- ☐ Country level data/benchmarks
- ☒ Reporting standards, infrastructure sector codes and certifications
- ☒ International initiatives, declarations or standards
- ☒ Engagements with stakeholders (e.g. contractors and suppliers)
- ☒ Advice from external sources
- ☐ Other, specify
- ☐ We do not track this information

INF 08.2	Additional information.
----------	-------------------------

In Public-Private Partnerships, investment companies depend largely on industrial contractors to deliver projects that not only comply with the laws and regulations, but with arrays of ESG commitments and objectives set by stakeholders, i.e. usually governments and communities.

As an example, one of RBIF I investment is in a portfolio of police stations. The investment company is mainly responsible for the maintenance of the police stations over time. The investment company does not have employees. As a consequence, the strongest way to promote ESG is to make sure that the subcontractor complies with RBIF I expectations-we go above the industry standards and strictly adhere to ESG criteria as set out in our checklist and policy.

As such, it is key to team up with partners strongly committed to ESG.

In both RBIF I investments, industrial partners are tier 1 international companies with ambitious ESG targets and clear policies: ACS iridium construction group, Acciona construction group, Veolia.

As an example, in the hospital investment, environmental KPIs have been defined and are monthly monitored by the investment company through Veolia.

Because such industrial partners are fully committed to ESG, they also ensure that their subcontractors comply with their criteria, ensuring compliance over the whole supply chain.

RiverRock always favours an opportunity where the partners are companies with ESG ambitions versus those with looser requirements or ambitions.

INF 09	Voluntary	Private	Additional Assessed	PRI 1
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INF 09.1	Indicate if ESG issues impacted your infrastructure investment selection processes during the reporting year.
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- ☒ ESG issues helped identify risks and/or opportunities for value creation.
- ☒ ESG issues led to the abandonment of potential investments.
- ☐ ESG issues impacted the investment in terms of price offered and/or paid.
- ☐ ESG issues impacted the terms in the shareholder/purchase agreements and/or lending covenants.
- ☐ ESG issues were considered but did not have an impact on the investment selection process.
- ☐ Other, specify
- ☐ Not applicable, our organisation did not select any investments in the reporting year.
- ☐ We do not track this potential impact

INF 09.2	Indicate how ESG issues impacted your infrastructure investment deal structuring processes during the reporting year.
-----------------	---

- ☐ ESG issues impacted the investment in terms of price offered and/or paid
- ☐ ESG issues impacted the terms in the shareholder/purchase agreements and/or lending covenants
- ☒ ESG issues were considered but did not have an impact on the deal structuring process
- ☐ Other, specify
- ☐ Not applicable, our organisation did not select any investments in the reporting year.
- ☐ We do not track this potential impact

INF 09.3	Additional information.
-----------------	-------------------------

RBIF I has turned down opportunities because of ESG, the most illustrative example being greenfield PPP projects to develop and build casinos in a European country. Despite being encouraged by some local governments, those projects have been judged below RBIF I own criteria's.

On the other hand, one opportunity currently under full due diligence has been pushed by the team following an analysis of the social role the asset played for the community.

Post-investment (monitoring and active ownership)

Overview

INF 11	Mandatory	Public	Gateway	PRI 2
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INF 11.1	Indicate whether your organisation and/or operators consider ESG issues in post-investment activities relating to your infrastructure assets.
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☒ 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.

- ☒ We consider ESG issues in the monitoring and operation of infrastructure
- ☒ We consider ESG issues in infrastructure maintenance
- ☒ We consider ESG issues in stakeholder engagements related to our infrastructure
- ☐ 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]

On an annual basis, the Investment Team undertakes a close monitoring of the ESG aspects, that have been identified during the due diligence phase throughout the life of each asset. The Investment Team is responsible for the monitoring of ESG matters and implementation of the ESG mitigation plan. Furthermore, the investment team fills a specific ESG questionnaire which is requested by (some) LPs on a yearly basis.

Notably, during our quarterly financial monitoring we also check the ESG considerations and impact KPIs in case of any changes or positive developments. We believe in providing this transparently to our investors.

At RiverRock level, Sustainable Development Goals (SDGs) have been identified as the overarching framework for the organisation ESG and social impact, with metrics based on the SDG Indicators specific to each fund.

The checklist items are aligned to the SDGs and SDG indicators relevant for the infrastructure fund.

Via a list of ca. 100 questions, the ESG checklist covers all of the following topics:

- Environmental Management
- Climate Change Issues
- Waste / Pollution
- Local Environment
- Employee Relations Strategy
- Occupational Health and Safety
- Adherence to UN Human Rights Conventions
- Employees
- Supply Chain Considerations
- Contractor Relationships
- Community Relations and Communications
- Cultural Fit
- Statutory Obligations
- Performance / Reward Strategy
- Board Structure
- Skills and Experience of Board
- Structure of Local Government
- Executive and Board Remuneration
- Reporting

During the initial months post-investment, information is collected from the asset companies via the checklist. Several working sessions are organised with the management of the asset companies: first to explain the approach and the questions, secondly to debrief and share best practices when straightforward issues are identified.

The next steps are:

- The identification of the key elements that need a specific action plan,
- The selection of the relevant KPIs that can be used for the monitoring during the life of the assets. The initial year constitutes the Baseline (we have begun this year).

☐ No

Infrastructure Monitoring and Operations

INF 12	Mandatory	Public	Core Assessed	PRI 2
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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.

- ☒ >90% of infrastructure assets
☐ 51-90% of infrastructure assets
☐ 10-50% of infrastructure assets
☐ <10% of infrastructure assets

(in terms of number 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.

☒ Environmental

List up to three example targets per issue

Climate resilience strategy
Energy conservation strategy
Environmental management system

☒ Social

List up to three example targets per issue

Women employees %
Hiring policies
Community engagement strategy

☒ Governance

List up to three example targets per issue

Local compliance
Independent Directors %
Anti discrimination policy

☐ We do not set and/or monitor against targets

INF 12.3	Additional information. [Optional]
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The Investment Team has committed to make sure stricter regulatory procedures are followed during the board of the hospital. It targets for receiving formal board material prior to at least 7 business days, legally review board minutes to make sure difference of opinion is fully documented, etc..

INF 13	Mandatory	Public	Additional Assessed	PRI 2
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INF 13.1	Indicate whether you track the proportion of your infrastructure investees that have an ESG/sustainability-related policy (or similar guidelines).
----------	--

☒ Yes

INF 13.2	Indicate the proportion of your infrastructure investees that have an ESG/sustainability-related policy (or similar guidelines).
----------	--

- ☐ >90% of infrastructure investees
- ☐ 51-90% of infrastructure investees
- ☒ 10-50% of infrastructure investees
- ☐ >0% and <10% of infrastructure investees
- ☐ 0% of infrastructure investees

(in terms of number of infrastructure investees)

INF 13.3	Describe how your organisation, and/or your operators, contribute to the infrastructure investees' management of ESG issues. [Optional]
----------	---

Our primary contribution to the infrastructure investees' management of ESG issues is through engagement, then education and capacity. Our first interaction with the management is through our due diligence where ESG issues are raised. If they are unsure or want to discuss we engage and find solutions together to identification and reporting, and in cases we educate the management on ESG issue and then on data collection. Our priority is to make their management aware of the ESG issues and address them to improve over time if needed.

☐ No

INF 14	Voluntary	Private	Descriptive	PRI 2,3
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INF 14.1	Indicate the type and frequency of reports you request and/or receive from infrastructure investees covering ESG issues.
----------	--

Type of Reporting

☒ Overarching portfolio asset/company reports or similar where management disclosure, financial and ESG data are integrated

	Typical reporting frequency
--	-----------------------------

- ☒ Quarterly or more frequently
- ☐ Biannually
- ☐ Annually
- ☐ Less frequently than annually
- ☐ Ad-hoc/when requested, specify
- ☐ Standalone reports highlighting targets and/or KPIs covering ESG issues
- ☐ Other, specify
- ☐ No reporting on ESG issues requested and/or provided by infrastructure investees

Infrastructure Maintenance

INF 15	Mandatory	Public	Core Assessed	PRI 2
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INF 15.1	Indicate the proportion of active infrastructure maintenance projects where ESG issues have been considered.
----------	--

- ☐ >90% of active maintenance projects
- ☐ 51-90% of active maintenance projects
- ☐ 10-50% of active maintenance projects
- ☐ <10% of active maintenance projects
- ☒ N/A, no maintenance projects of infrastructure assets are active

(in terms of number of active maintenance projects)

Stakeholder engagement

INF 16	Voluntary	Private	Additional Assessed	PRI 2
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INF 16.1	Indicate which stakeholders your organisation, and/or operators, engaged with on ESG issues in relation to your infrastructure assets during the reporting year and what proportion of your investments they apply to.
----------	--

	Stakeholders engaged
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- ☐ Regulators
- ☐ Communities
- ☒ Other stakeholder, specify
- Co-shareholders and contractors

	Percentage of infrastructure assets these apply to
--	--

- ☒ >90% of infrastructure assets
☐ 51-90% of infrastructure assets
☐ 10-50% of infrastructure assets
☐ <10% of infrastructure assets

(in terms of number of infrastructure assets)

☐ Other stakeholder, specify

INF 16.2	Describe your approach to stakeholder engagements in relation to your infrastructure assets.
-----------------	--

We incorporate engagement with stakeholders as part of our responsible investing approach. Our asset management policy is based on a collaborative approach with its partners. RiverRock builds a strong and collaborative approach with its partners through engagement.

What we do is to raise ESG factors, discuss disclosures and monitoring/reporting of these factors, and if they have questions on what these are or why they are material we spend time together to explore and educate.

Particularly with public partners, like our government counterparts, we spend significant time in discussions, education and capacity building on these points and offer to transparently share our reporting and monitoring of the ESG factors.

Outputs and outcomes

INF 17	Voluntary	Private	Additional Assessed	PRI 1,2
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INF 17.1	Indicate whether your organisation measures how your approach to responsible investment in Infrastructure investments has affected financial and/or ESG performance.
-----------------	--

- ☐ We measure whether our approach to ESG issues impacts funds' financial performance
☒ We measure whether our approach to ESG issues impacts funds' ESG performance

Describe the impact on:	Impact
Funds' ESG performance	<input checked="" type="radio"/> Positive <input type="radio"/> Negative <input type="radio"/> No impact

☐ None of the above

INF 17.2	Describe how you are able to determine these outcomes.
-----------------	--

Our approach was to set a baseline this year and track progress over time on ESG factors and impact KPIs. Our approach to ESG has been that we believe as good corporate citizens our assets will perform better and our relationships with our stakeholders will be stronger.

Based on what we have tracked over 2019 we feel that the positive engagement and ESG factors (with supporting KPIs) have contributed positively thanks to protecting on the downside, preventing risks, and

mitigating risks to offer more upside. We will be able to provide clearer financial correlation in the future this year it is based on our insights from our investment expertise and what we see in the assets.

Progress towards attaining the specific targets of our KPIs are measured over the life of the investment. If deemed appropriate, progress will be quantified through financial indicators. If not appropriate, impact will be measured through qualitative indicators and inferred how this affects the assets' performance.

INF 18	Voluntary	Private	Descriptive	PRI 1-3
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INF 18.1	Provide examples of ESG issues that affected your infrastructure investments during the reporting year.
----------	---

☒ Add Example 1

ESG issue	Climate resilience strategy
Types of infrastructure affected	Social infrastructure, hospitals, energy
Impact (or potential impact) on investment	We have engaged with potential and existing investees to ask about their climate resilience strategies, is there one in place if not, if one can be enacted to respond to the relevant factors in their geography--for example, flooding. This was an issue with one potential investee and we made sure they had a clear policy and approach to dealing with being potentially inundated, and also how to engage with the community on greening factors to reduce erosion/flood levels from a nearby river. We consider climate risks and transition risks as material.
Activities undertaken to influence the investment and the outcomes	<ul style="list-style-type: none"> -engaging with potential investee on policy -research on climate risks and mitigating factors -outreach to government counterpart on policy in geography -raised issue at IC level

☐ Add Example 2

☐ Add Example 3

☐ Add Example 4

☐ Add Example 5

INF 18.2	Additional information.
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We have begun tracking how the ESG considerations affect our investments from this year.

Communication

INF 19	Mandatory to Report Voluntary to Disclose	Private	Descriptive	PRI 6
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INF 19.1

Describe your organisation's approach to disclosing ESG incidents in infrastructure investments to your investor clients.

There has been no incident in the infrastructure investment to be reported to investors/clients. However as mentioned earlier, incidents are recorded and tracked and disclosed as part of ESG due diligence on RiverRock strategies.

As part of our reporting, quarterly reports are produced by the investment team and distributed to LPs of the fund, there is a specific ESG update section for each of the asset. Should an ESG incident occur, it will be reported under this section.

RiverRock European Capital Partners LLP

Reported Information

Private version

Confidence building measures

PRI disclaimer

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Confidence building measures

CM1 01	Mandatory	Public	Additional Assessed	General
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CM1 01.1 Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:

- ☐ Third party assurance over selected responses from this year's PRI Transparency Report
- ☐ Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year
- ☐ Third party assurance or audit of the correct implementation of RI processes (that have been reported to the PRI this year)
- ☐ Internal audit of the correct implementation of RI processes and/or accuracy of RI data (that have been reported to the PRI this year)
- ☒ Internal verification of responses before submission to the PRI (e.g. by the CEO or the board)
 - ☒ Whole PRI Transparency Report has been internally verified
 - ☐ Selected data has been internally verified
- ☒ Other, specify
The reported information has undergone external review by a third party specialised in ESG and Impact..
- ☐ None of the above

CM1 02	Mandatory	Public	Descriptive	General
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CM1 02.1 We undertook third party assurance on last year's PRI Transparency Report

- ☐ Whole PRI Transparency Report was assured last year
- ☐ Selected data was assured in last year's PRI Transparency Report
- ☒ We did not assure last year's PRI Transparency report
- ☐ None of the above, we were in our preparation year and did not report last year.

CM1 03	Mandatory	Public	Descriptive	General
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CM1 03.1 We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:

- ☐ We adhere to an RI certification or labelling scheme
- ☐ We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report
- ☐ ESG audit of holdings
- ☒ Other, specify
We have public ESG policy and proprietary impact investing approach tied to IRIS and SDGs. These are reported and verified by an independent third party.
- ☐ None of the above

CM1 03.5 Additional information [OPTIONAL]

The firm will go through an ISAE 3402 assurance process which will include ESG in 2020.

CM1 04	Mandatory	Public	Descriptive	General
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CM1 04.1	Do you plan to conduct third party assurance of this year`s PRI Transparency report?
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- ☒ Whole PRI Transparency Report will be assured
- ☐ Selected data will be assured
- ☐ We do not plan to assure this year`s PRI Transparency report

CM1 04.2a	Provide details related to the assurance that will be conducted
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	Expected date the assurance will be complete
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31/08/2020

	Who will conduct the assurance
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BDO

	Assurance standard to be used
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- ☐ ISAE/ ASEA 3000
- ☒ ISAE 3402
- ☐ ISO standard
- ☐ AAF01/06
- ☐ AA1000AS
- ☐ IFC performance standards
- ☐ ASAE 3410 Assurance Engagements on Greenhouse Gas Statements.
- ☐ National standard
- ☐ Other

	Level of assurance sought
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- ☐ Limited or equivalent
- ☒ Reasonable or equivalent

CM1 07	Mandatory	Public	Descriptive	General
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CM1 07.1	Indicate who has reviewed/verified internally the whole - or selected data of the - PRI Transparency Report . and if this applies to selected data please specify what data was reviewed
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Who has conducted the verification

- ☒ CEO or other Chief-Level staff

Sign-off or review of responses

- ☒ Sign-off
- ☒ Review of responses
- ☐ The Board
- ☐ Investment Committee
- ☐ Compliance Function
- ☒ RI/ESG Team
- ☐ Investment Teams
- ☐ Legal Department
- ☒ Other (specify)

specify

Our ESG and Impact Adviser provided an independent review of the responses and verification in terms of alignment with reported processes.
The whole PRI Transparency Report was reviewed by staff/departments listed in CM 01.7 before submission, meeting PRI's definition of verification/review.