



# RI TRANSPARENCY REPORT

2020

ThomasLloyd Group

## About this report

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

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

## PRI disclaimer

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.

## Usage restrictions

Public Transparency Reports are the intellectual property of PRI. Under no circumstances, can this report or any of its contents be sold to third parties.

OO 01	Mandatory	Gateway/Peering	General
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OO 01.1

Select the services and funds you offer

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

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).

100

OO 03.1

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

☐ Yes  
☒ No

OO 04.1

Indicate the year end date for your reporting year.

31/12/2019

OO 04.2

Indicate your total AUM at the end of your reporting year.

Total AUM  
 400,000,000 USD  
 400000000 USD

OO 04.4

Indicate the assets which are subject to an execution and/or advisory approach. Provide this figure based on the end of your reporting year

☒ Not applicable as we do not have any assets under execution and/or advisory approach

OO 05.1

Provide an approximate percentage breakdown of your AUM at the end of your reporting year using the following asset classes and investment strategies:

	Internally managed (%)	Externally managed (%)
Listed equity	0	0

Fixed income	0	0
Private equity	0	0
Property	0	0
Infrastructure	99	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	1	0
Money market instruments	0	0
Other (1), specify	0	0
Other (2), specify	0	0

OO 06	Mandatory	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

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

0

Developed Markets

100

Emerging Markets

0

Frontier Markets

0

Other Markets

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

Infrastructure

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

Cash

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

OO 12	Mandatory	Gateway	General
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OO 12.1	Below are all applicable modules or sections you may report on. Those which are mandatory to report (asset classes representing 10% or more of your AUM) are already ticked and read-only. Those which are voluntary to report on can be opted into by ticking the box.		
	Core modules		
	<input checked="" type="checkbox"/> Organisational Overview <input checked="" type="checkbox"/> Strategy and Governance		
	RI implementation directly or via service providers		
	Direct - Other asset classes with dedicated modules		
	<input checked="" type="checkbox"/> Infrastructure		
	Closing module		
	<input checked="" type="checkbox"/> Closing module		
OO INF 01	Mandatory to Report, Voluntary to Disclose	Descriptive	General
Private			
OO INF 02	Mandatory to Report, Voluntary to Disclose	Gateway/Peering	General
Private			
OO INF 03	Mandatory to Report, Voluntary to Disclose	Descriptive	General
Private			
OO Checks			Checks
<input checked="" type="checkbox"/> If there are any messages below, please review them before continuing. If there are no messages below, please save this page and continue.			

SG 01	Mandatory	Core Assessed	General
SG 01.1	Indicate if you have an investment policy that covers your responsible investment approach.		
<input checked="" type="checkbox"/> Yes			
SG 01.2	Indicate the components/types and coverage of your policy.		
<b>Policy components/types</b> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Policy setting out your overall approach</li> <li><input checked="" type="checkbox"/> Formalised guidelines on environmental factors</li> <li><input checked="" type="checkbox"/> Formalised guidelines on social factors</li> <li><input checked="" type="checkbox"/> Formalised guidelines on corporate governance factors</li> <li><input type="checkbox"/> Fiduciary (or equivalent) duties</li> <li><input type="checkbox"/> Asset class-specific RI guidelines</li> <li><input type="checkbox"/> Sector specific RI guidelines</li> <li><input checked="" type="checkbox"/> Screening / exclusions policy</li> <li><input type="checkbox"/> Other, specify (1)</li> <li><input type="checkbox"/> Other, specify(2)</li> </ul>		<b>Coverage by AUM</b> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Applicable policies cover all AUM</li> <li><input type="checkbox"/> Applicable policies cover a majority of AUM</li> <li><input type="checkbox"/> Applicable policies cover a minority of AUM</li> </ul>	
SG 01.3	Indicate if the investment policy covers any of the following		
<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Your organisation's definition of ESG and/or responsible investment and it's relation to investments</li> <li><input checked="" type="checkbox"/> Your investment objectives that take ESG factors/real economy influence into account</li> <li><input type="checkbox"/> Time horizon of your investment</li> <li><input checked="" type="checkbox"/> Governance structure of organisational ESG responsibilities</li> <li><input checked="" type="checkbox"/> ESG incorporation approaches</li> <li><input type="checkbox"/> Active ownership approaches</li> <li><input type="checkbox"/> Reporting</li> <li><input checked="" type="checkbox"/> Climate change</li> <li><input type="checkbox"/> Understanding and incorporating client / beneficiary sustainability preferences</li> <li><input type="checkbox"/> Other RI considerations, specify (1)</li> <li><input type="checkbox"/> Other RI considerations, specify (2)</li> </ul>			
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.		
<p>Top-down portfolio construction follows a clear process. To begin with, our interdisciplinary team of experienced investment specialists screens the investment universe according to geographical, sectoral and tech criteria. In the next stage, the identified investment potential is subjected to a detailed analysis process. Different countries and regions of Asia and Australasia are evaluated using a comprehensive catalogue of criteria that includes current and predicted financial and economic indicators, existing capital and marked structures, political stability and legal system. Other criteria - which include the subsequent choice of tech - encompass climatic, geographical and topographical conditions as well as a country or region's need for infrastructural investment.</p> <p>A bottom-up investment approach is applied to selecting the individual projects; it pursues clearly defined rules and encompasses the fields of origination, due diligence, negotiation and documentation, as well as investment.</p> <p>The principles of social and responsible investment are particularly important. They stipulate that investments today must benefit future generations, protect natural resources, incorporate ethical and ecological values, and provide infrastructure assets for a sustainable future. Extensive selection criteria are applied to ensure sustainability, which are both independent and corporate.</p>			
<input type="radio"/> No			

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

SG 02	Mandatory	Core Assessed	PRI 6
SG 02.1	Indicate which of your investment policy documents (if any) are publicly available. Provide a URL and an attachment of the document.		
<input checked="" type="checkbox"/> Policy setting out your overall approach			
		URL/Attachment	
<input checked="" type="checkbox"/> URL <a href="https://www.thomas-lloyd.com/en/social-responsibility/">https://www.thomas-lloyd.com/en/social-responsibility/</a>		<input type="checkbox"/> Attachment (will be made public)	
<input type="checkbox"/> Formalised guidelines on environmental factors			
<input checked="" type="checkbox"/> Formalised guidelines on social factors			
		URL/Attachment	
<input checked="" type="checkbox"/> URL			

<a href="https://www.thomas-lloyd.com/en/social-responsibility/esg-management/our-approach/">https://www.thomas-lloyd.com/en/social-responsibility/esg-management/our-approach/</a> <input type="checkbox"/> Attachment (will be made public)									
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<input type="checkbox"/> 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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<input type="checkbox"/> Attachment									
<input type="checkbox"/> Climate change									
<input type="checkbox"/> We do not publicly disclose any investment policy components									
SG 03	Mandatory	Core Assessed	General						
SG 03.1	Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.								
<input checked="" type="radio"/> Yes									
SG 03.2	Describe your policy on managing potential conflicts of interest in the investment process.								
<p>To minimise risks when valuing the projects, leading external consultants in the fields of technical and legal due diligence, deal structuring and in some cases project finance are used before the investment is made. External specialists are also sometimes engaged for subsequent investment monitoring during the development and construction phases and after COD in operations and maintenance.</p>									
<input type="radio"/> No									
SG 04	Voluntary	Descriptive	General						
Private									
SG 05	Mandatory	Gateway/Core Assessed	General						
SG 05.1	Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.								
<input checked="" type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input type="radio"/> Ad-hoc basis <input type="radio"/> It is not set/reviewed									

SG 06	Voluntary	Descriptive	General									
Private												
SG 07	Mandatory	Core Assessed	General									
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.											
<table border="1"> <thead> <tr> <th>Roles</th> </tr> </thead> <tbody> <tr> <td> <input checked="" type="checkbox"/> Board members or trustees           <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Oversight/accountability for responsible investment</li> <li><input checked="" type="checkbox"/> Implementation of responsible investment</li> <li><input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment</li> </ul> </td> </tr> <tr> <td> <input checked="" type="checkbox"/> Internal Roles (triggers other options)           <table border="1"> <thead> <tr> <th>Select from the below internal roles</th> </tr> </thead> <tbody> <tr> <td> <input checked="" type="checkbox"/> Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee               <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Oversight/accountability for responsible 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<input type="checkbox"/> Dedicated responsible investment staff <input type="checkbox"/> Investor relations <input type="checkbox"/> Other role, specify (1) <input type="checkbox"/> Other role, specify (2)												
<input checked="" type="checkbox"/> External managers or service providers <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Oversight/accountability for responsible investment</li> <li><input type="checkbox"/> Implementation of responsible investment</li> <li><input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment</li> </ul>												
SG 07.2	For the roles for which you have RI oversight/accountability or implementation responsibilities, indicate how you execute these responsibilities.											
Via board policy decisions and investment committee reports and resolutions.												
SG 07.3	Indicate the number of dedicated responsible investment staff your organisation has.											
10												
SG 07 CC	Mandatory to Report, Voluntary to Disclose	Descriptive	General									
Private												
SG 08	Voluntary	Additional Assessed	General									
Private												
SG 09	Mandatory	Core Assessed	PRI 4,5									
SG 09.1	Select the collaborative organisation and/or initiatives of which your organisation is a member or in which it participated during the reporting year, and the role you played.											
<input checked="" type="checkbox"/> Principles for Responsible Investment <table border="1"> <thead> <tr> <th>Your organisation's role in the initiative during the reporting period (see definitions)</th> </tr> </thead> <tbody> <tr> <td>Basic</td> </tr> </tbody> </table>				Your organisation's role in the initiative during the reporting period (see definitions)	Basic							
Your organisation's role in the initiative during the reporting period (see definitions)												
Basic												
<input type="checkbox"/> 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
- ☐ 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	

- ☐ 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)

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

- ☒ United Nations Global Compact

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

- ☒ Other collaborative organisation/initiative, specify

LuxFlag

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

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

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

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

- ☒ 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
Begun in-house awareness sessions on ESG and RI

Frequency of contribution
<input type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input checked="" type="radio"/> Ad hoc <input type="radio"/> Other

☐ 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
Engaged with service providers in Luxembourg to promote RI

Frequency of contribution
<input type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input checked="" type="radio"/> Ad hoc <input type="radio"/> Other

☒ Spoke publicly at events and conferences to promote responsible investment

Description
Speaker at World Bank events Speaker at Duff & Phelps ESG conference

Frequency of contribution
<input type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input checked="" type="radio"/> Ad hoc <input type="radio"/> Other

☒ Wrote and published in-house research papers on responsible investment

Description
A report on socio-economic impact of investments in renewable energy in the Philippines.

Frequency of contribution
<input type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input checked="" type="radio"/> Ad hoc <input type="radio"/> Other

☒ Encouraged the adoption of the PRI

Description
Engaged with service providers in Luxembourg to adopt PRI

Frequency of contribution
<input type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input checked="" type="radio"/> Ad hoc <input type="radio"/> Other

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

	<input type="checkbox"/> Wrote and published articles on responsible investment in the media <input type="checkbox"/> A member of PRI advisory committees/ working groups, specify <input type="checkbox"/> On the Board of, or officially advising, other RI organisations (e.g. local SIFs) <input type="checkbox"/> Other, specify												
	<input type="radio"/> 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]												
Written and published research on OECD and IMF forecasts and the importance of infrastructure investment, air quality in India and the importance of renewable energy and on why the Philippines needs to continue to shift away from fossil fuels to meets its RE targets.													
SG 11	Voluntary	Additional Assessed	PRI 4,5,6										
Private													
SG 12	Mandatory	Core Assessed	PRI 4										
SG 12.1	Indicate whether your organisation uses investment consultants.												
<input type="checkbox"/> Yes, we use investment consultants <input checked="" type="checkbox"/> No, we do not use investment consultants.													
SG 13	Mandatory	Descriptive	PRI 1										
SG 13.1	Indicate whether the organisation carries out scenario analysis and/or modelling, and if it does, provide a description of the scenario analysis (by asset class, sector, strategic asset allocation, etc.).												
<input checked="" type="checkbox"/> Yes, in order to assess future ESG factors <div> <div>Describe</div> <div>Our dynamic top-down investment process incorporates latest evidence on economic, regulatory and governance metrics.</div> </div> <input checked="" type="checkbox"/> Yes, in order to assess future climate-related risks and opportunities <div> <div>Describe</div> <div>We incorporate latest evidence on climate change and weather events to judge our ability to withstand, mitigate and adapt to adverse scenarios.</div> </div> <input type="checkbox"/> No, our organisation does not currently carry out scenario analysis and/or modelling													
SG 13.2	Indicate if your organisation considers ESG issues in strategic asset allocation and/or allocation of assets between sectors or geographic markets.												
<div>We do the following</div> <input type="checkbox"/> Allocation between asset classes <input type="checkbox"/> Determining fixed income duration <input checked="" type="checkbox"/> Allocation of assets between geographic markets <input type="checkbox"/> Sector weightings <input type="checkbox"/> Other, specify <input type="checkbox"/> We do not consider ESG issues in strategic asset allocation													
SG 13 CC	Mandatory to Report, Voluntary to Disclose	Descriptive	General										
Private													
SG 14	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1										
Private													
SG 14 CC	Voluntary		General										
SG 14.6 CC	Provide further details on the key metric(s) used to assess climate-related risks and opportunities.												
<table border="1"> <thead> <tr> <th>Metric Type</th> <th>Coverage</th> <th>Purpose</th> <th>Metric Unit</th> <th>Metric Methodology</th> </tr> </thead> <tbody> <tr> <td>Climate-related targets</td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>				Metric Type	Coverage	Purpose	Metric Unit	Metric Methodology	Climate-related targets				
Metric Type	Coverage	Purpose	Metric Unit	Metric Methodology									
Climate-related targets													
SG 14.7 CC	Describe in further detail the key targets.												
<table border="1"> <thead> <tr> <th>Target type</th> <th>Baseline year</th> <th>Target year</th> <th>Description</th> <th>Attachments</th> </tr> </thead> <tbody> </tbody> </table>				Target type	Baseline year	Target year	Description	Attachments					
Target type	Baseline year	Target year	Description	Attachments									
SG 15	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1										
Private													
SG 16	Mandatory	Descriptive	General										
SG 16.1	Describe how you address ESG issues for internally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.												

Asset Class	Describe what processes are in place and the outputs or outcomes achieved		
Cash	The funds aim to be fully invested and cash is held for operational requirements.		

SG 18	Voluntary	Descriptive	General
Private			
SG 19	Mandatory	Core Assessed	PRI 2, 6

SG 19.1

Indicate whether your organisation typically discloses asset class specific information proactively. Select the frequency of the disclosure to clients/beneficiaries and the public, and provide a URL to the public information.

Infrastructure

Do you disclose?

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

The information disclosed to clients/beneficiaries is the same

☒ Yes
 ☐ No

Disclosure to public and URL

Disclosure to public and URL

☒ ESG information on how you select infrastructure investments
 ☒ ESG information on how you monitor and manage infrastructure investments
 ☐ Information on your infrastructure investments' ESG performance

Quarterly or more frequently

<https://www.thomas-loyd.com/en/projects/current-projects/>

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

12

TRANSPARENCY

INF 01	Voluntary	Descriptive	PRI 1-6
Private			
INF 02	Mandatory	Core Assessed	PRI 1-6
INF 02.1	Indicate if your organisation has a responsible investment policy for infrastructure.		
<input checked="" type="checkbox"/> Yes			
INF 02.2	Provide a URL if your policy is publicly available.		
<a href="https://www.thomas-loyd.com/en/social-responsibility/">https://www.thomas-loyd.com/en/social-responsibility/</a>			
<input type="checkbox"/> No			
INF 03	Mandatory	Core Assessed	PRI 1,4,6
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.		
<input checked="" type="checkbox"/> Yes			
INF 03.2	Indicate how your fund placement documents (PPMs or similar) refer to the following responsible investment aspects of your organisation:		
<input checked="" type="checkbox"/> Policy and commitment to responsible investment <input checked="" type="checkbox"/> Approach to ESG issues in pre-investment processes <input checked="" type="checkbox"/> Approach to ESG issues in post-investment processes			
<input type="checkbox"/> No <input type="checkbox"/> Not applicable as our organisation does not fundraise			
INF 04	Voluntary	Additional Assessed	PRI 4
Private			
INF 05	Mandatory	Gateway	PRI 1
INF 05.1	Indicate if your organisation typically incorporates ESG issues when selecting infrastructure investments.		
<input checked="" type="checkbox"/> Yes			
INF 05.2	Describe your organisation's approach to incorporating ESG issues in infrastructure investment selection.		
<p>ThomasLloyd's ESG Integration Methodology describes how we invest socially responsibly, how we use our investment skills to positively contribute to society beyond our core investments, and how we maintain high standards of corporate governance to secure the long-term success of our business. Our ESG-related due diligence starts when an investment opportunity is identified. Our teams consider sector- and region-specific issues, the unique framework conditions of each project, and reputational risks when evaluating these opportunities.</p> <p>After an investment has been made, the teams monitor and manage a broad range of ESG issues at the project and cross-portfolio levels. Our approach to integrating ESG factors in all investment types is also informed by leading external standards. Based on its reputation, we employ the UN Global Compact's principles as a reference for the standards that our direct investments should meet.</p>			
<input type="checkbox"/> No			
INF 06	Voluntary	Descriptive	PRI 1,4
Private			
INF 07	Mandatory	Core Assessed	PRI 1,3
INF 07.1	Indicate which E, S and/or G issues are typically considered by your organisation in the investment selection process and list up to three typical examples per issue.		
<input checked="" type="checkbox"/> Environmental Protect natural resources Reduce CO2 emissions Improve land quality			
<input checked="" type="checkbox"/> Social Create permanent employment Provide medical facilities Encourage female empowerment			
<input checked="" type="checkbox"/> Governance Maintain strict anti-bribery and anti-corruption policy Commit to regulatory compliance Align compensation to ESG outcomes			
INF 08	Voluntary	Additional Assessed	PRI 1,3
Private			

INF 09	Voluntary	Additional Assessed	PRI 1
Private			
INF 11	Mandatory	Gateway	PRI 2
INF 11.1	Indicate whether your organisation and/or operators consider ESG issues in post-investment activities relating to your infrastructure assets.		
<input checked="" type="checkbox"/> Yes			
INF 11.2	Indicate how your organisation, and/or operators, considers ESG issues in the following post-investment activities relating to your infrastructure assets.		
<input checked="" type="checkbox"/> We consider ESG issues in the monitoring and operation of infrastructure <input checked="" type="checkbox"/> We consider ESG issues in infrastructure maintenance <input checked="" type="checkbox"/> We consider ESG issues in stakeholder engagements related to our infrastructure <input type="checkbox"/> We consider ESG issues in other post-investment activities, specify			
<input type="radio"/> No			
INF 12	Mandatory	Core Assessed	PRI 2
INF 12.1	Indicate the proportion of infrastructure assets for which your organisation and/or operators included ESG performance in investment monitoring during the reporting year.		
<input checked="" type="radio"/> >90% of infrastructure assets <input type="radio"/> 51-90% of infrastructure assets <input type="radio"/> 10-50% of infrastructure assets <input type="radio"/> <10% of infrastructure assets			
INF 12.2	Indicate ESG issues for which your organisation, and/or operators, typically sets and monitors targets (KPIs or similar) and provide examples per issue.		
<input type="checkbox"/> Environmental <input type="checkbox"/> Social <input type="checkbox"/> Governance <input checked="" type="checkbox"/> We do not set and/or monitor against targets			
INF 13	Mandatory	Additional Assessed	PRI 2
INF 13.1	Indicate whether you track the proportion of your infrastructure investees that have an ESG/sustainability-related policy (or similar guidelines).		
<input checked="" type="checkbox"/> Yes			
INF 13.2	Indicate the proportion of your infrastructure investees that have an ESG/sustainability-related policy (or similar guidelines).		
<input checked="" type="radio"/> >90% of infrastructure investees <input type="radio"/> 51-90% of infrastructure investees <input type="radio"/> 10-50% of infrastructure investees <input type="radio"/> >0% and <10% of infrastructure investees <input type="radio"/> 0% of infrastructure investees			
<input type="radio"/> No			
INF 14	Voluntary	Descriptive	PRI 2,3
Private			
INF 15	Mandatory	Core Assessed	PRI 2
INF 15.1	Indicate the proportion of active infrastructure maintenance projects where ESG issues have been considered.		
<input checked="" type="radio"/> >90% of active maintenance projects <input type="radio"/> 51-90% of active maintenance projects <input type="radio"/> 10-50% of active maintenance projects <input type="radio"/> <10% of active maintenance projects <input type="radio"/> N/A, no maintenance projects of infrastructure assets are active			
INF 16	Voluntary	Additional Assessed	PRI 2
Private			
INF 17	Voluntary	Additional Assessed	PRI 1,2
Private			



CM1 01	Mandatory	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
☐ None of the above

CM1 02	Mandatory	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	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

CM1 03.2

Which scheme?

☐ National SRI label based on the EUROSIF Transparency guidelines
☐ B-corporation
☐ UK Stewardship code
☐ GRESB
☐ Commodity type label (e.g. BCI)
☐ Social label
☐ Climate label
☐ RIAA
☒ Other

Specify

We began engagement with LuxFlag in 2019 and were awarded their 'Environmental' label in Q3 2019

% of total AUM the scheme applies

☐ < 25%
☒ 25-50 %
☐ 50-70 %
☐ >75 %

☐ 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
☐ None of the above

CM1 04	Mandatory	Descriptive	General
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CM1 04.1

Do you plan to conduct third party assurance of this year's PRI Transparency report?

☒ 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

31/12/2020

Who will conduct the assurance

We are currently interviewing prospective Assurance providers. It will likely be one of the Big Four consultancy firms



	Assurance standard to be used				
	<input checked="" type="checkbox"/> ISAE/ ASEA 3000 <input type="checkbox"/> ISAE 3402 <input type="checkbox"/> ISO standard <input type="checkbox"/> AAF01/06 <input type="checkbox"/> AA1000AS <input type="checkbox"/> IFC performance standards <input type="checkbox"/> ASAE 3410 Assurance Engagements on Greenhouse Gas Statements. <input type="checkbox"/> National standard <input type="checkbox"/> Other				
	Level of assurance sought				
	<input checked="" type="radio"/> Limited or equivalent <input type="radio"/> Reasonable or equivalent				
CM1 06	Mandatory	Descriptive	General		
CM1 06.1	Provide details of the third party assurance of RI related processes, and/or details of the internal audit conducted by internal auditors of RI related processes (that have been reported to the PRI this year)				
	What RI processes have been assured				
	<input checked="" type="checkbox"/> RI policies <table border="1"> <tr> <td>Specify</td> </tr> <tr> <td>LuxFlag have conducted due diligence</td> </tr> </table>			Specify	LuxFlag have conducted due diligence
Specify					
LuxFlag have conducted due diligence					
	<input type="checkbox"/> RI related governance <input type="checkbox"/> Investment selection process in non-listed assets <input type="checkbox"/> Post-investment ESG activities for infrastructure and/or property assets <input type="checkbox"/> Other				
	Who has conducted the assurance				
	LuxFlag				
	When was the process assurance completed(dd/ mm/yy)				
	31/12/2019				
	Assurance standard used				
	<input type="checkbox"/> ISAE 3402 <input type="checkbox"/> ISO standard <input type="checkbox"/> AAF 01/06 <input type="checkbox"/> SSE18 <input type="checkbox"/> AT 101 (excluding financial data) <input checked="" type="checkbox"/> Other <table border="1"> <tr> <td>Specify</td> </tr> <tr> <td>LuxFag labelling</td> </tr> </table>			Specify	LuxFag labelling
Specify					
LuxFag labelling					
	Level of assurance sought				
	<input checked="" type="radio"/> Limited or equivalent <input type="radio"/> Reasonable or equivalent				
CM1 07	Mandatory	Descriptive	General		
CM1 07.1	Indicate who has reviewed/verified internally the whole - or selected data of the - PRI Transparency Report . and if this applies to selected data please specify what data was reviewed				
	<input checked="" type="checkbox"/> CEO or other Chief-Level staff <table border="1"> <tr> <td>Sign-off or review of responses</td> </tr> <tr> <td> <input checked="" type="checkbox"/> Sign-off  <input checked="" type="checkbox"/> Review of responses               </td> </tr> </table>			Sign-off or review of responses	<input checked="" type="checkbox"/> Sign-off <input checked="" type="checkbox"/> Review of responses
Sign-off or review of responses					
<input checked="" type="checkbox"/> Sign-off <input checked="" type="checkbox"/> Review of responses					
	<input type="checkbox"/> The Board <input type="checkbox"/> Investment Committee <input type="checkbox"/> Compliance Function <input type="checkbox"/> RI/ESG Team				

- ☐ Investment Teams
- ☐ Legal Department
- ☐ Other (specify)