



ASSESSMENT REPORT 2018

Harbour Asset Management

INTRODUCTION

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

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

ORGANISATIONAL OVERVIEW

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

SUMMARY SCORECARD

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

ASSESSMENT BY MODULE

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

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

PUBLISHING IN THE DATA PORTAL

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

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

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

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

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YEAR ON YEAR PERFORMANCE

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

INDICATOR SCORECARD

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

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

PEER COMPARISON

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

Organisational Overview

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

MAIN CHARACTERISTICS	
Name	Harbour Asset Management
Signatory Category	Investment Manager
Signatory Type	Fund management
Size	US\$ 1 - 4.99 billion AUM
Signed PRI Initiative	2010
Region	Oceania
Country	New Zealand
Disclosure of Voluntary Indicators	3% from 35 Voluntary indicators

YOUR ORGANISATION'S ASSETS UNDER MANAGEMENT (AUM)†		
Asset Class	Internally Managed	Externally Managed
Listed equity	>50%	0
Fixed income	10-50%	0
Private equity	0	0
Property	0	0
Infrastructure	0	0
Commodities	0	0
Hedge funds	0	0
Forestry	0	0
Farmland	0	0
Inclusive finance	0	0
Cash	0	0
Other 1	0	0
Other 2	0	0

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

Summary Scorecard

AUM	Module Name	Your Score	<div> <div></div> <div>Your Score</div> <div></div> <div>Median Score</div> </div>
	01.Strategy & Governance	A+	
Direct & Active Ownership Modules			
>50%	10. Listed Equity - Incorporation	A	
>50%	11. Listed Equity - Active Ownership	A	
10-50%	12. Fixed Income - SSA	B	
10-50%	13. Fixed Income - Corporate Financial	B	
10-50%	14. Fixed Income - Corporate Non-Financial	B	
<10%	15. Fixed Income - Securitised	Not reported	

Strategy And Governance

Indicator Scorecard

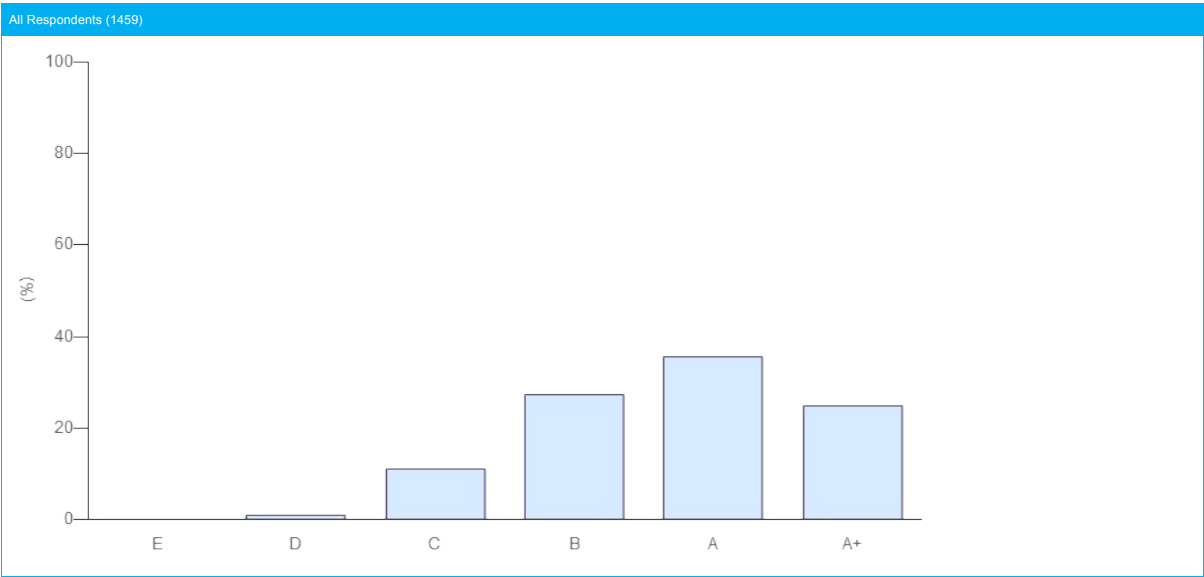
Module	Strategy and Governance
Total Score	29 ★ (out of a maximum 30 ★ from 10 indicators including the following additionally assessed indicators: SG 08.a, SG 08.b, SG 11)
Band	A+

SECTION	INDICATOR			MEDIAN PEER SCORE (# PEERS)	YOUR SCORE	CHANGE AGAINST LAST YEAR
	NUMBER	TYPE	TOPIC			
RI Policy	SG 01	CORE	RI Policy and coverage	★★★ (1460)	★★★★	—
	SG 02	CORE	Publicly available RI policy or guidance documents	★★★ (1460)	★★★☆	—
	SG 03	CORE	Conflicts of interest	★★★ (1460)	★★★★	—
Objective & Strategies	SG 05	CORE	RI goals and objectives	★★★ (1460)	★★★★	—
Governance & Human Resources	SG 07	CORE	RI roles and responsibilities	★★★ (1460)	★★★★	—
	SG 08a	ADDITIONAL	RI in performance management & rewards	★★★ (1460)	★★★★	—
	SG 08b	ADDITIONAL	RI in personal development / training	★★★ (1460)	★★★★	—
Promoting RI	SG 09	CORE	Collaborative organisations / initiatives	★★★ (1460)	★★★★	—
	SG 10	CORE	Promoting RI independently	★★★ (1460)	★★★★	—
	SG 11	ADDITIONAL	Dialogue with public policy makers or standard setters	☆☆☆ (1460)	★★★★	—
ESG Issues In Asset Allocation	SG 14	ADDITIONAL	Investment risks and opportunity	★★★ (1460)	★★★★	—
Assurance of Responses	CM 01	ADDITIONAL	Assurance, verification, or review	★★★ (1460)	★★★☆	—

COMPARISON WITH PEERS

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

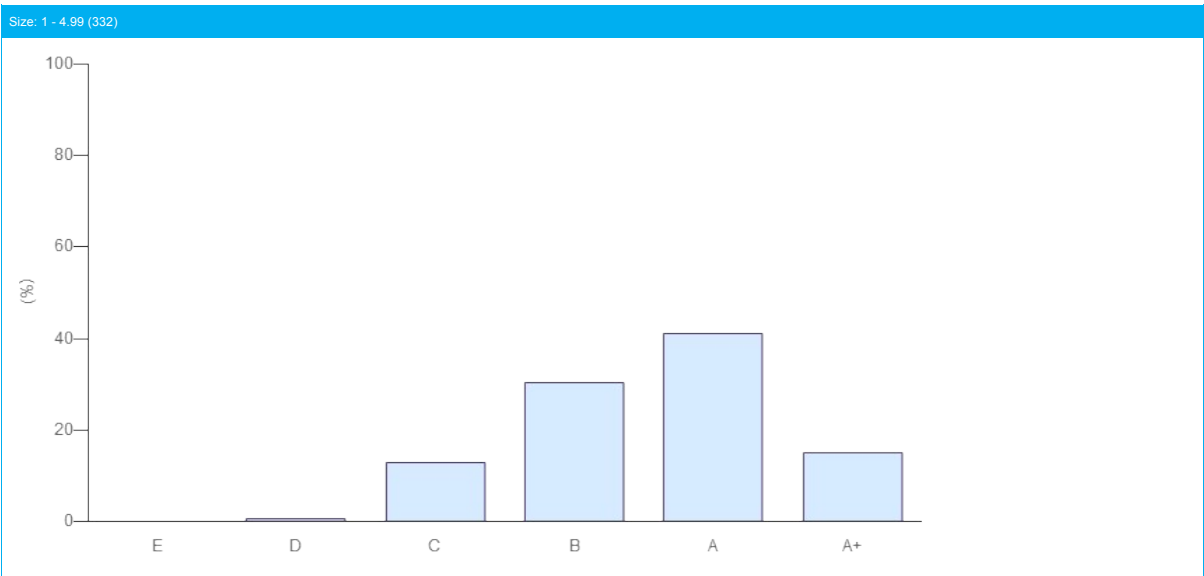
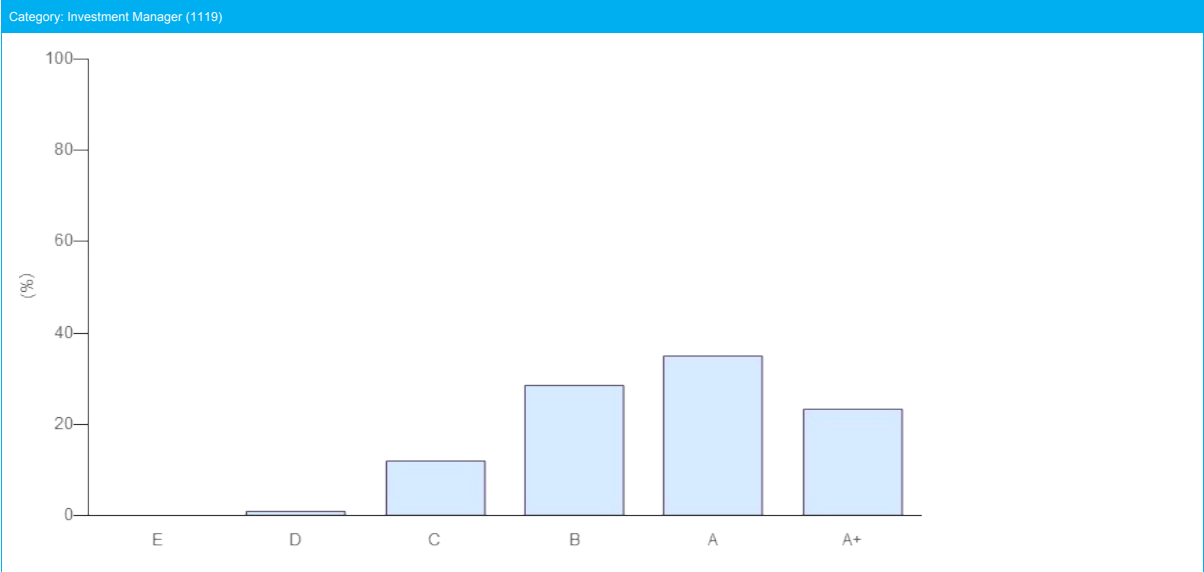
Module	STRATEGY AND GOVERNANCE
Band	A+



COMPARISON WITH PEERS

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

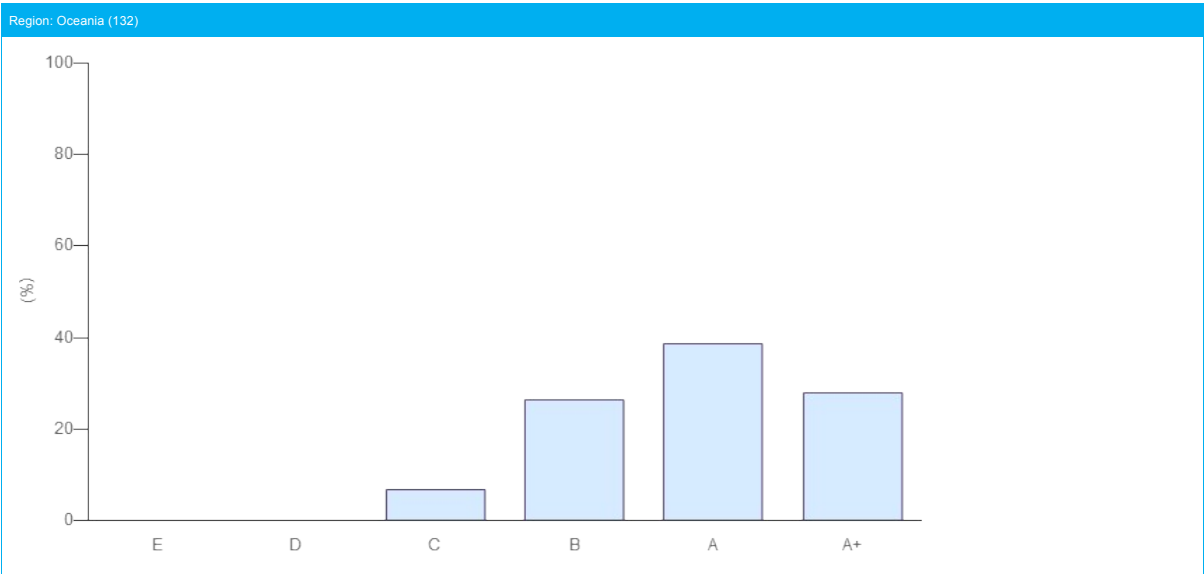
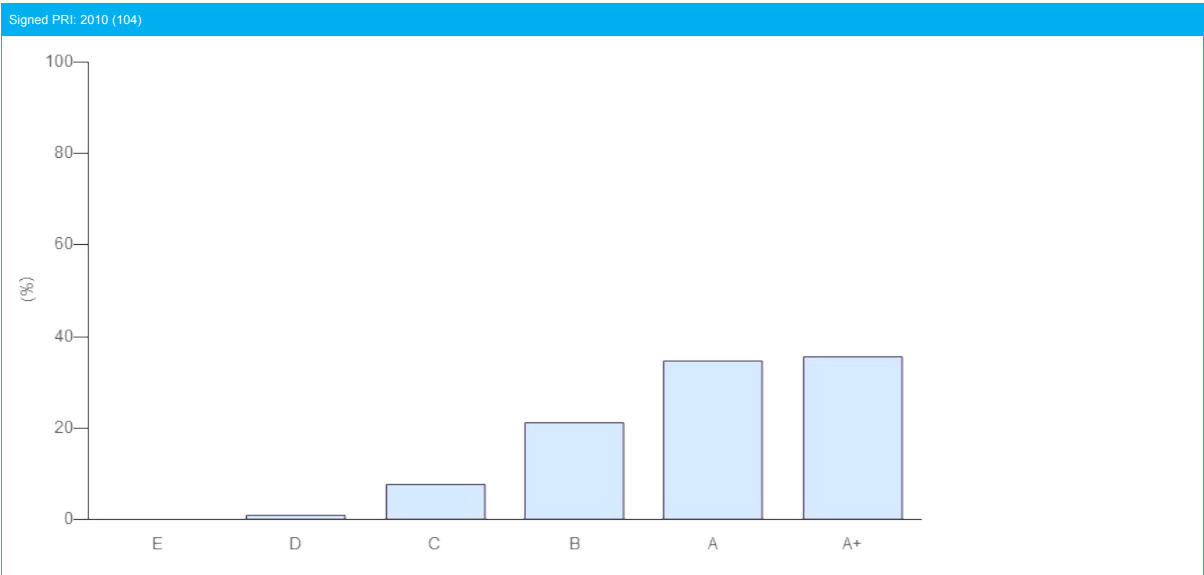
Module	STRATEGY AND GOVERNANCE
Band	A+



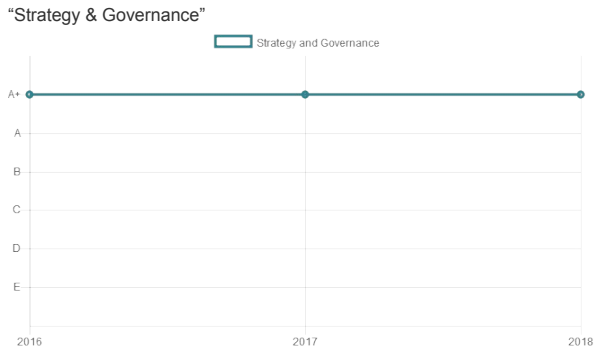
COMPARISON WITH PEERS

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

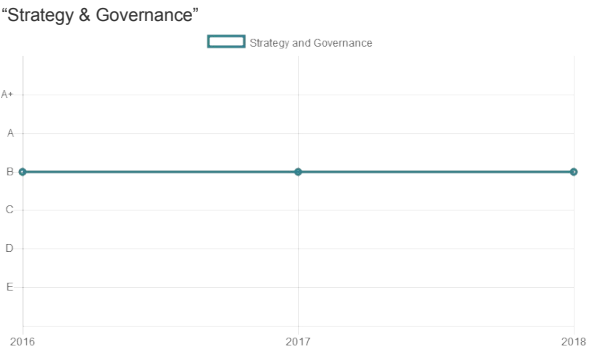
Module	STRATEGY AND GOVERNANCE
Band	A+



Your Company Year-On-Year Performance



Average Year-On-Year Trends



DIRECT - LISTED EQUITY - INCORPORATION

MODULE OVERVIEW

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

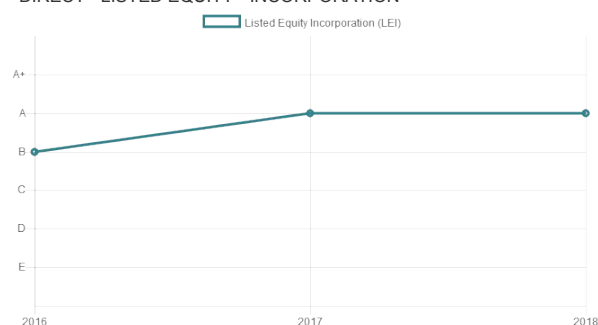
Module Band	A
Score based on	Integration
Screening	NA
Integration	A
Thematic	Not Scored

OVERVIEW OF INCORPORATION STRATEGIES (LEI 03)

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

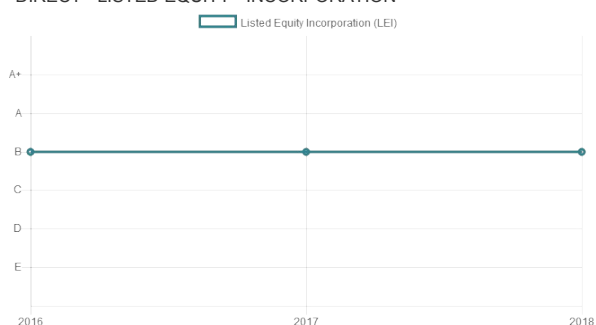
Your Company Year-On-Year Performance

"DIRECT - LISTED EQUITY - INCORPORATION"



Average Year-On-Year Trends

"DIRECT - LISTED EQUITY - INCORPORATION"



Direct - LISTED EQUITY - INTEGRATION

Indicator Scorecard

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

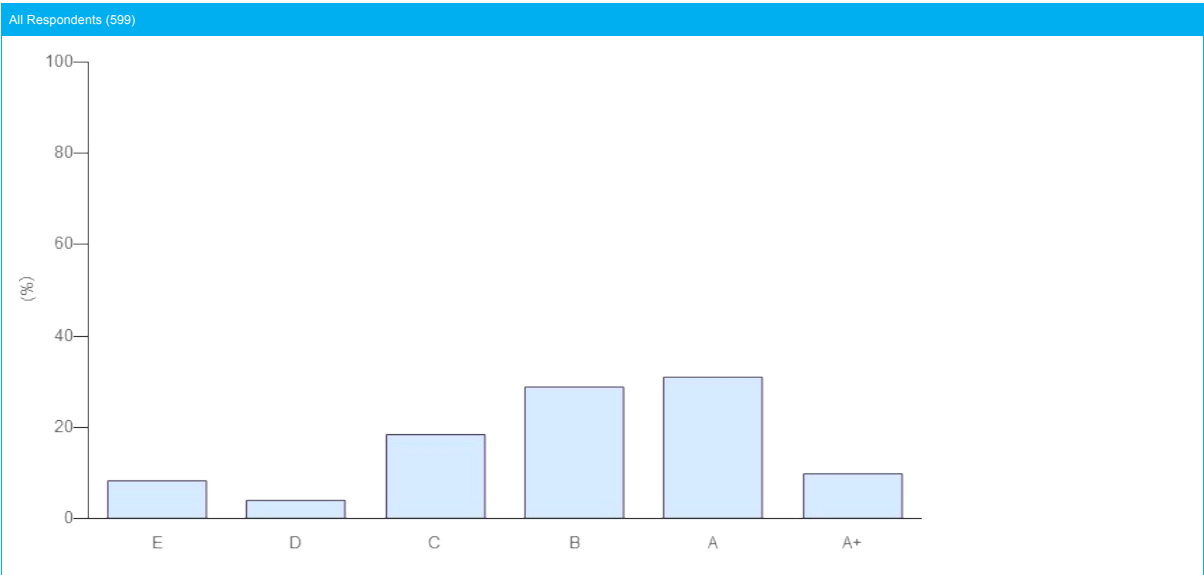
Module	LISTED EQUITY - INCORPORATION
Incorporation Strategy	INTEGRATION
Total Score	14 ★ (out of a maximum 18 ★ from 6 indicators including the following additionally assessed indicators: LEI 02, LEI 03)
Band	A

SECTION	INDICATOR			MEDIAN PEER SCORE (# PEERS)	YOUR SCORE	CHANGE AGAINST LAST YEAR
	NUMBER	TYPE	TOPIC			
IMPLEMENTATION PROCESSES	LEI 02	ADDITIONAL	Type of ESG information used in investment decision	★★★★ (598)	★★★★	—
	LEI 03	ADDITIONAL	Information from engagement and/or voting used in investment decision-making	★★★★ (598)	★★★★	—
IMPLEMENTATION: INTEGRATION	LEI 08	CORE	Review ESG issues while researching companies/sectors	★★★☆☆ (598)	★★★★	⬆
	LEI 09	ADDITIONAL	Processes to ensure integration is based on robust analysis	★★★★ (598)	★★★★	⬆
	LEI 10	CORE	Aspects of analysis ESG information is integrated into	★★★☆☆ (598)	★★★★	⬆
OUTPUTS AND OUTCOMES	LEI 13	ADDITIONAL	Measurement of financial and ESG outcomes of ESG incorporation	★★★☆☆ (598)	★★★☆☆	—
COMMUNICATION	SG 19a	CORE	Disclosure of approach to public	★★★☆☆ (598)	★★★☆☆	⬇
	SG 19b	CORE	Disclosure of approach to clients/beneficiaries	★★★☆☆ (598)	★★★☆☆	⬇

COMPARISON WITH PEERS

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

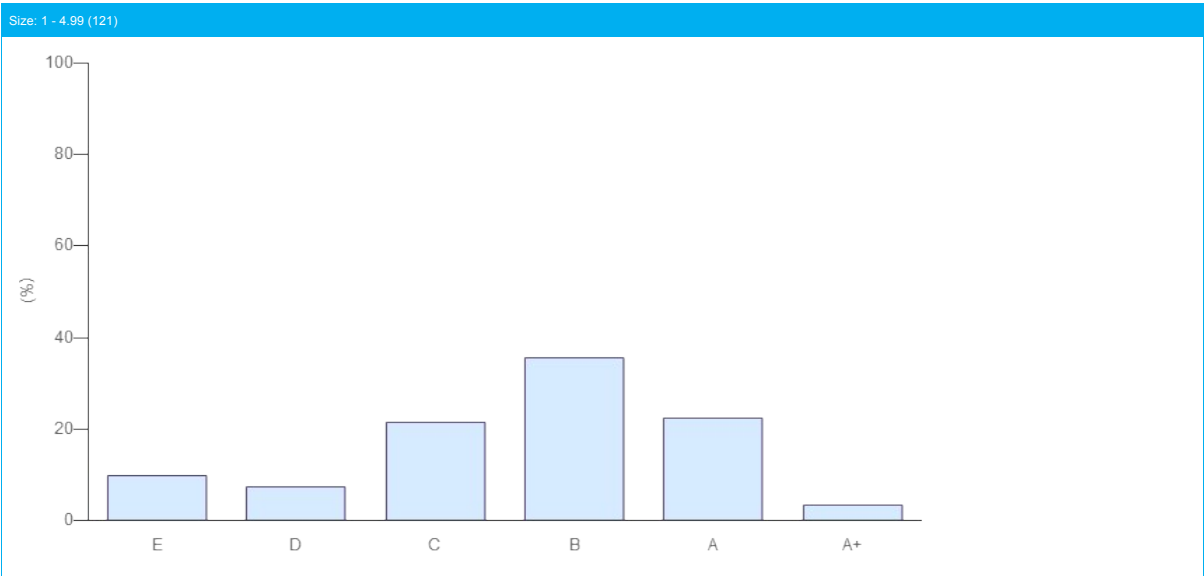
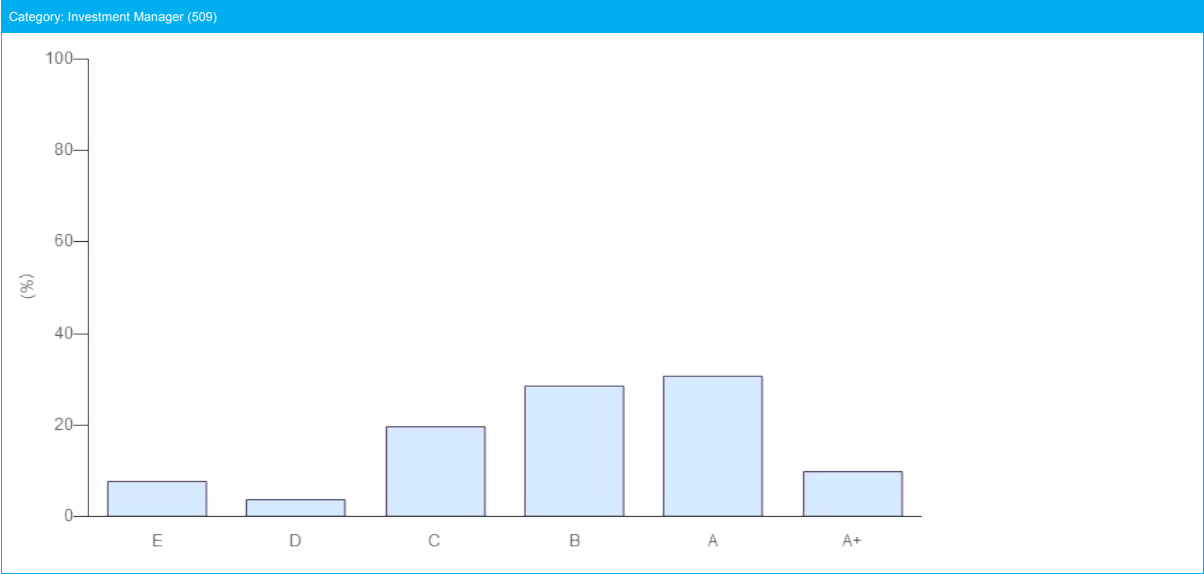
Module	DIRECT - LISTED EQUITY - INTEGRATION
Band	A



COMPARISON WITH PEERS

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

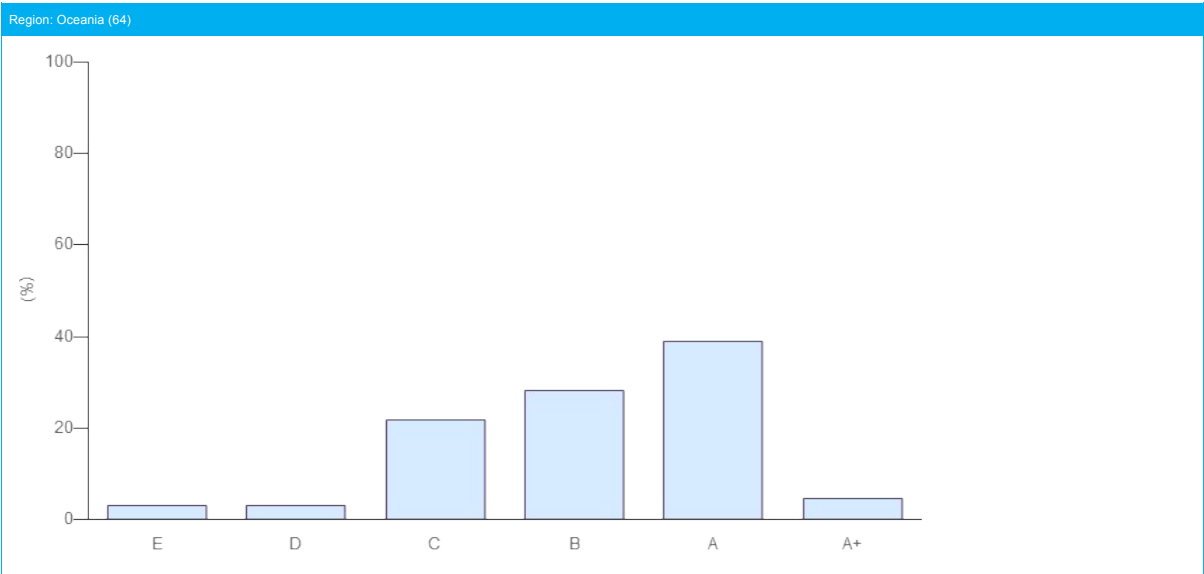
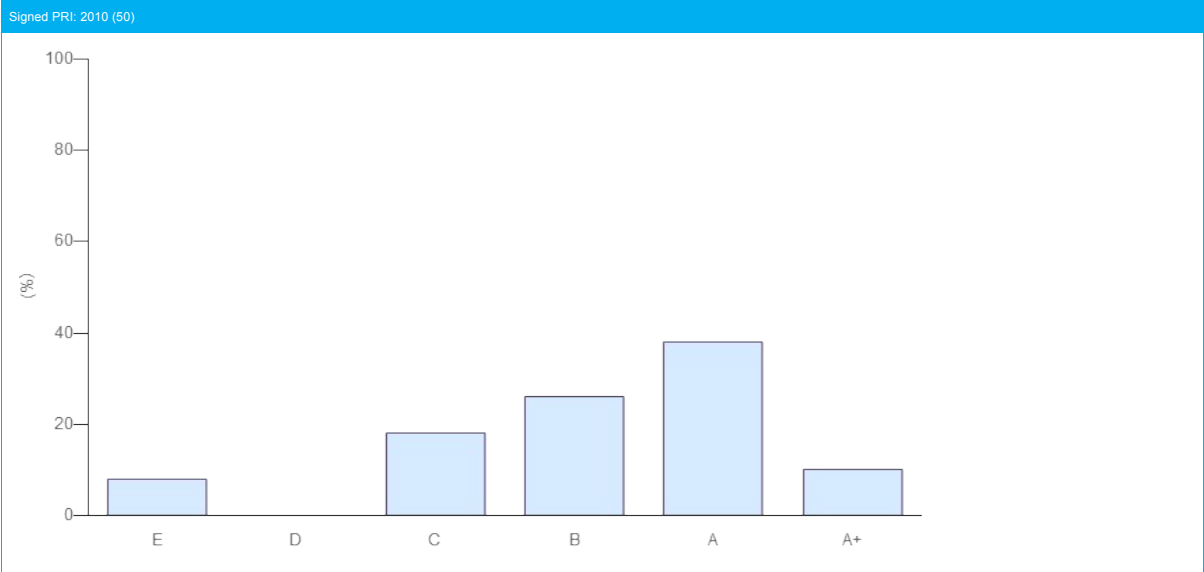
Module	DIRECT - LISTED EQUITY - INTEGRATION
Band	A



COMPARISON WITH PEERS

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

Module	DIRECT - LISTED EQUITY - INTEGRATION
Band	A



DIRECT - LISTED EQUITY - ACTIVE OWNERSHIP

MODULE OVERVIEW

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

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

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

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

DIRECT - LISTED EQUITY - INDIVIDUAL ENGAGEMENTS

Indicator Scorecard

This section looks at how your organisation carries out engagements individually through internal staff. If your organisation did not respond to an applicable indicator, you will see a score of ☆☆☆

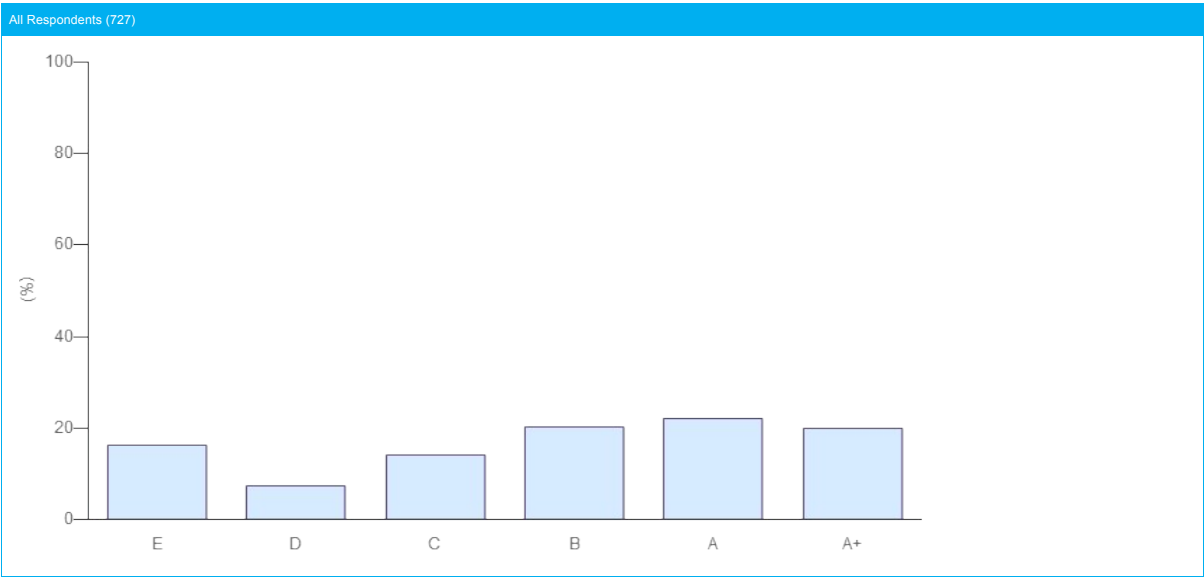
Section	LISTED EQUITY - INDIVIDUAL ENGAGEMENTS
Type of Engagement	INDIVIDUAL/INTERNAL STAFF ENGAGEMENTS
Total Score	20 ★ (out of a maximum 27 ★ from indicators including the following additionally assessed indicators: LEA 09, LEA 14, LEA 12)
Band	B

SECTION	INDICATOR			MEDIAN PEER SCORE (# PEERS)	YOUR SCORE	CHANGE AGAINST LAST YEAR
	NUMBER	TYPE	TOPIC			
OVERVIEW	LEA 01	CORE	Description of approach to engagement	★★★ (726)	★★★★	—
INTERNAL PROCESSES	LEA 03	CORE	Process for identifying and prioritising engagement activities	★★★ (726)	★★★★	—
	LEA 04	CORE	Objectives for engagement activities	★★★ (726)	★★★★	↑
GENERAL PROCESSES	LEA 09	ADDITIONAL	Share insights from engagements with internal/external managers	★★★ (726)	★★★★	—
OUTPUTS AND OUTCOMES	LEA 11a	CORE	Number of companies engaged with, intensity of engagement and effort	★★★ (726)	★★★☆☆	↑
	LEA 11b	ADDITIONAL		☆☆☆ (726)	☆☆☆☆	—
	LEA 11c	ADDITIONAL		☆☆☆ (726)	☆☆☆☆	—
	LEA 12	ADDITIONAL	Engagement methods	☆☆☆ (726)	★★★☆☆	↓
	LEA 14	ADDITIONAL	Engagements on E, S and/or G issues	★★★ (726)	★★★★	—
COMMUNICATION	SG 19a	CORE	Disclosure of approach to public	★★★ (726)	☆☆☆☆	—
	SG 19b	CORE	Disclosure of approach to clients/beneficiaries	☆☆☆ (726)	★★★☆☆	↓

COMPARISON WITH PEERS

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

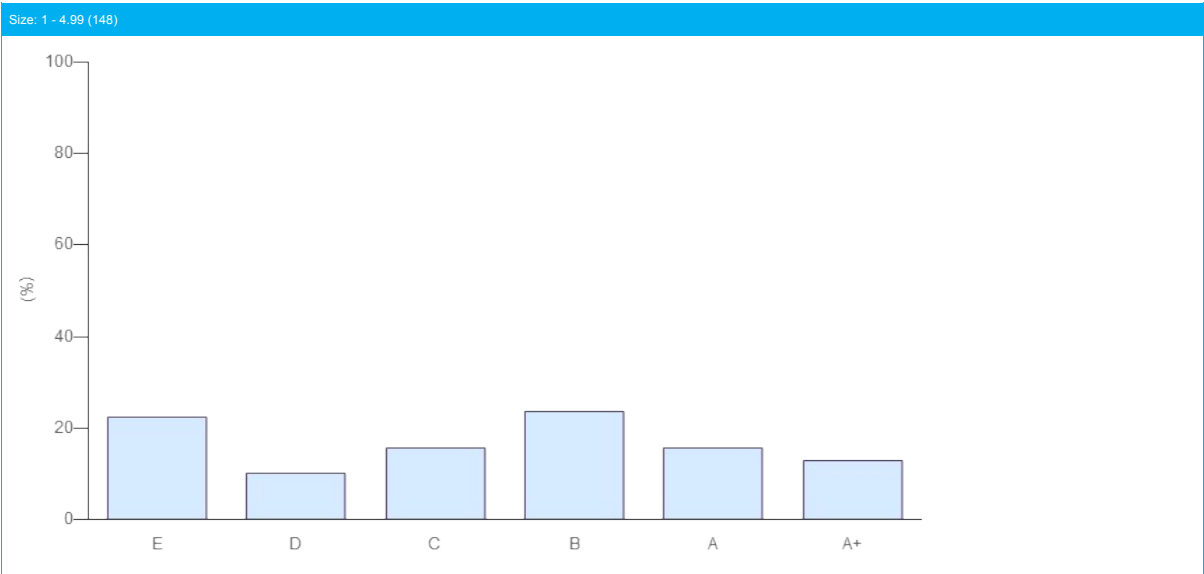
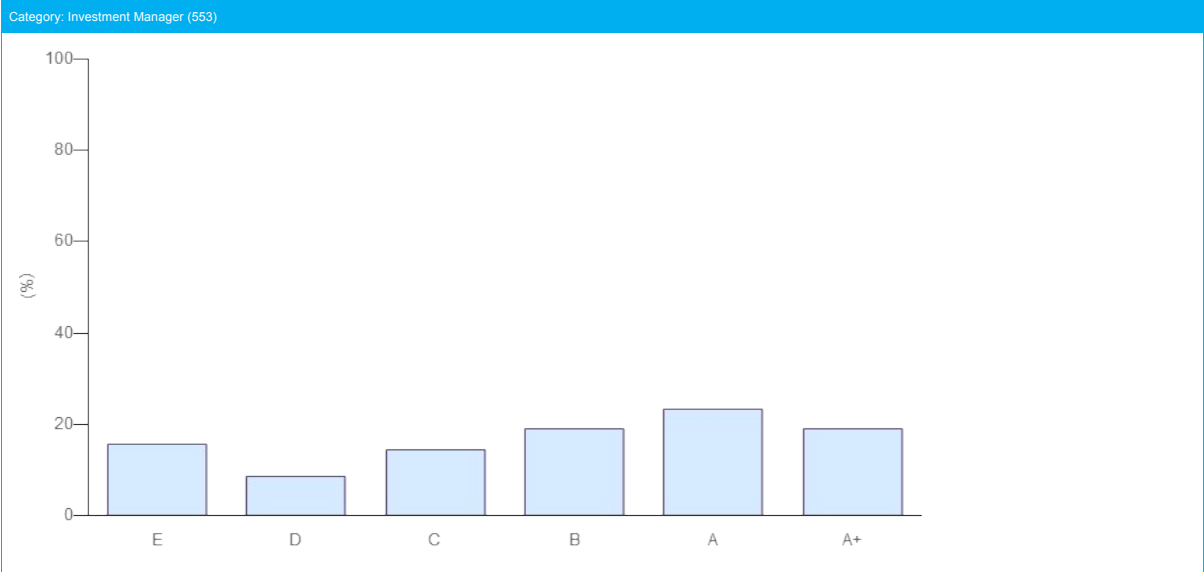
Module	DIRECT - LISTED EQUITY - INDIVIDUAL ENGAGEMENTS
Band	B



COMPARISON WITH PEERS

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

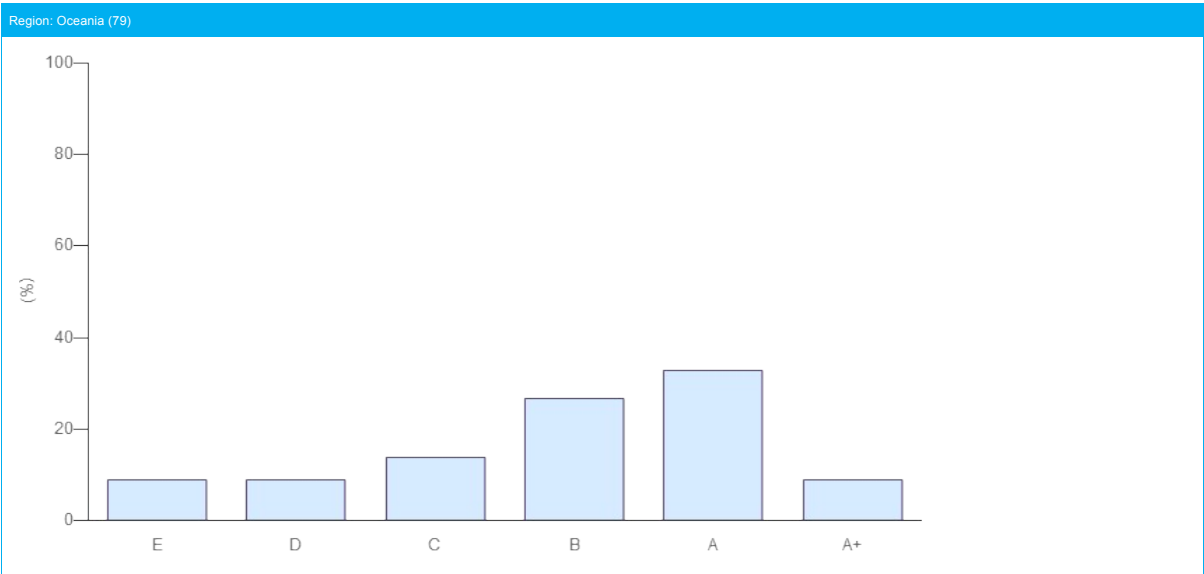
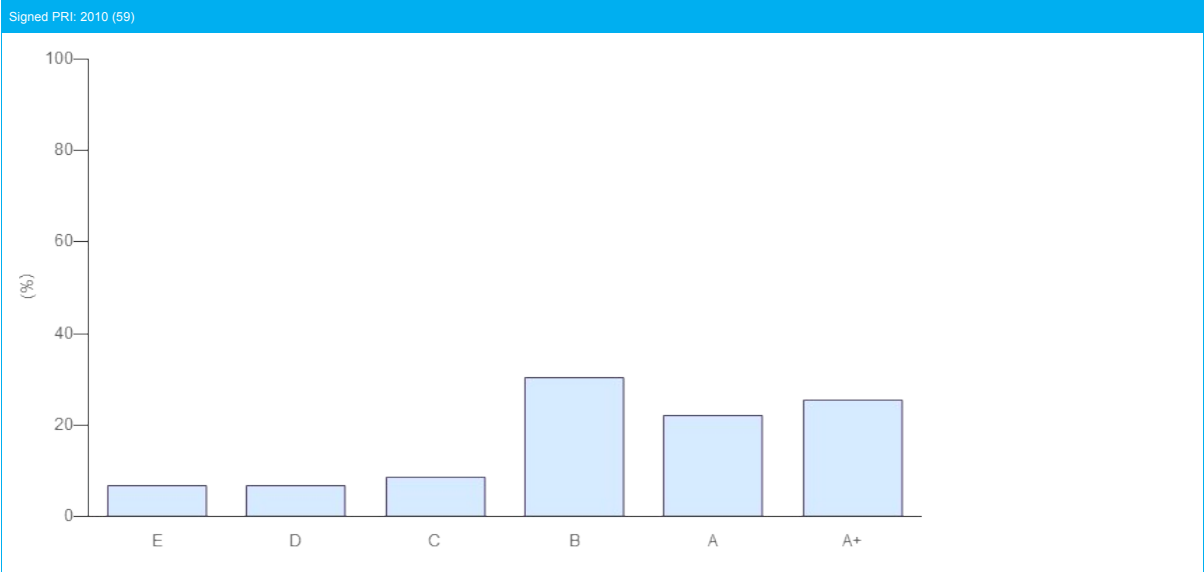
Module	DIRECT - LISTED EQUITY - INDIVIDUAL ENGAGEMENTS
Band	B



COMPARISON WITH PEERS

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

Module	DIRECT - LISTED EQUITY - INDIVIDUAL ENGAGEMENTS
Band	B



Direct - LISTED EQUITY - COLLABORATIVE ENGAGEMENTS

Indicator Scorecard

This section looks at how your organisation carries out engagements via collaborations. If your organisation did not respond to an applicable indicator, you will see a score of ☆☆☆

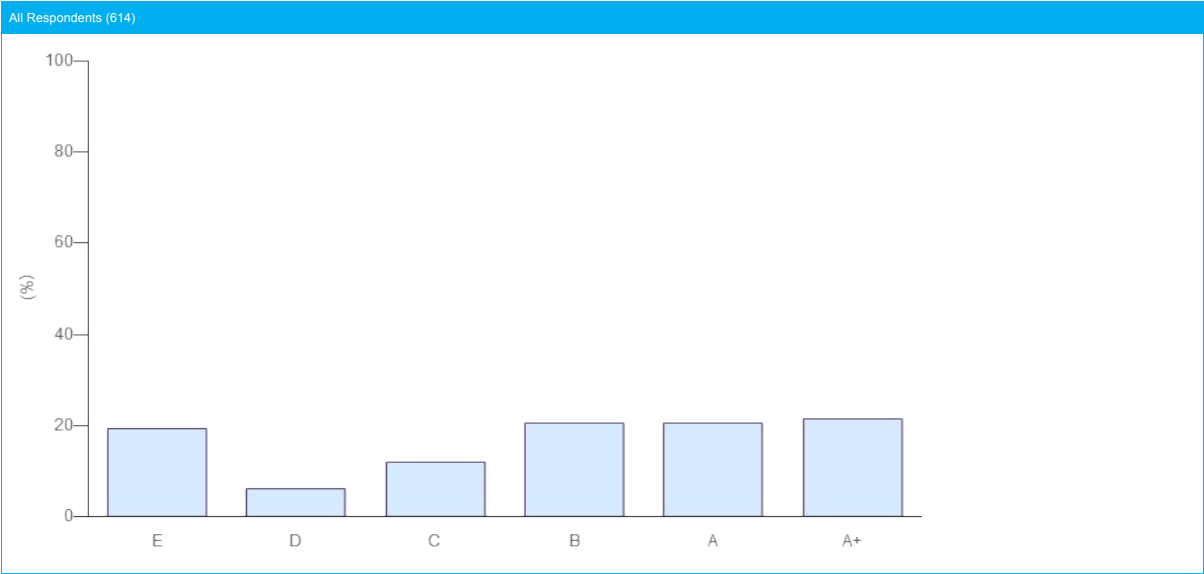
Section	LISTED EQUITY - COLLABORATIVE ENGAGEMENTS
Type of Engagement	COLLABORATIVE ENGAGEMENTS
Total Score	16 ★ (out of a maximum 27 ★ from indicators including the following additionally assessed indicators: LEA 09, LEA 14, LEA 12)
Band	B

SECTION	INDICATOR			MEDIAN PEER SCORE (# PEERS)	YOUR SCORE	CHANGE AGAINST LAST YEAR
	NUMBER	TYPE	TOPIC			
OVERVIEW	LEA 01	CORE	Description of approach to engagement	★★★★ (614)	★★★★	—
COLLABORATIVE PROCESSES	LEA 05	CORE	Process for identifying and prioritising engagement activities	★★★★ (614)	☆☆☆	—
	LEA 06	CORE	Objectives for engagement activities	★★★★ (614)	★★★★	—
GENERAL PROCESSES	LEA 09	ADDITIONAL	Share insights from engagements with internal/external managers	★★★★ (614)	★★★★	—
OUTPUTS AND OUTCOMES	LEA 11a	CORE	Number of companies engaged with, intensity of engagement and effort	★★★★ (614)	★★★★	⬆️
	LEA 11b	ADDITIONAL		☆☆☆ (614)	☆☆☆	—
	LEA 11c	ADDITIONAL		☆☆☆ (614)	☆☆☆	—
	LEA 12	ADDITIONAL	Engagement methods	★★★★ (614)	★★★★	⬇️
	LEA 14	ADDITIONAL	Engagements on E, S and/or G issues	★★★★ (614)	★★★★	—
COMMUNICATION	SG 19a	CORE	Disclosure of approach to public	★★★★ (614)	☆☆☆	—
	SG 19b	CORE	Disclosure of approach to clients/beneficiaries	☆☆☆ (614)	★★★★	⬇️

COMPARISON WITH PEERS

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

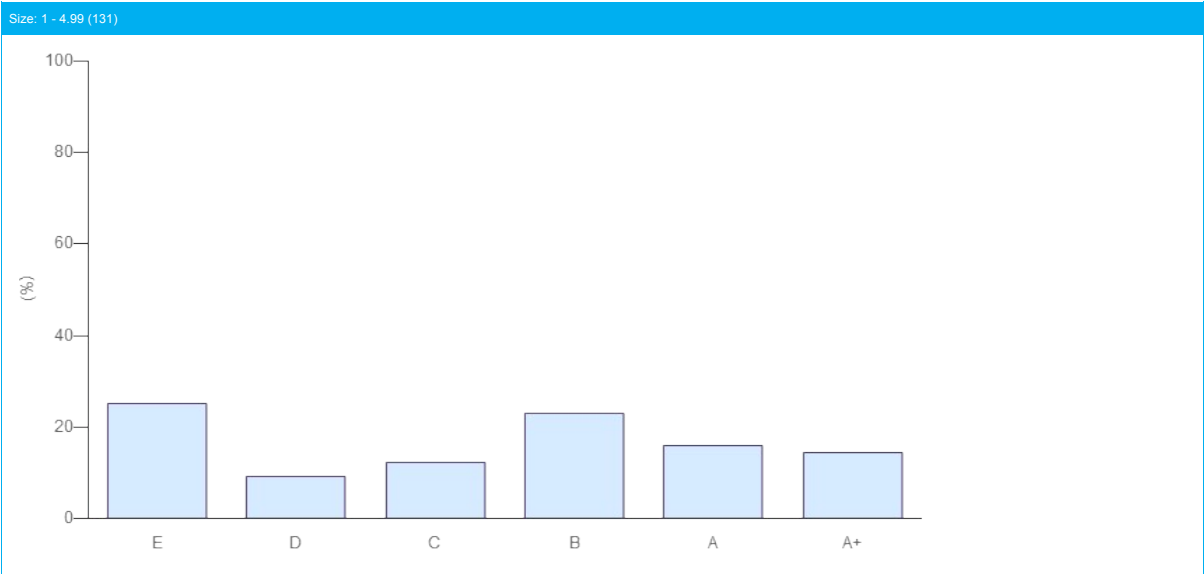
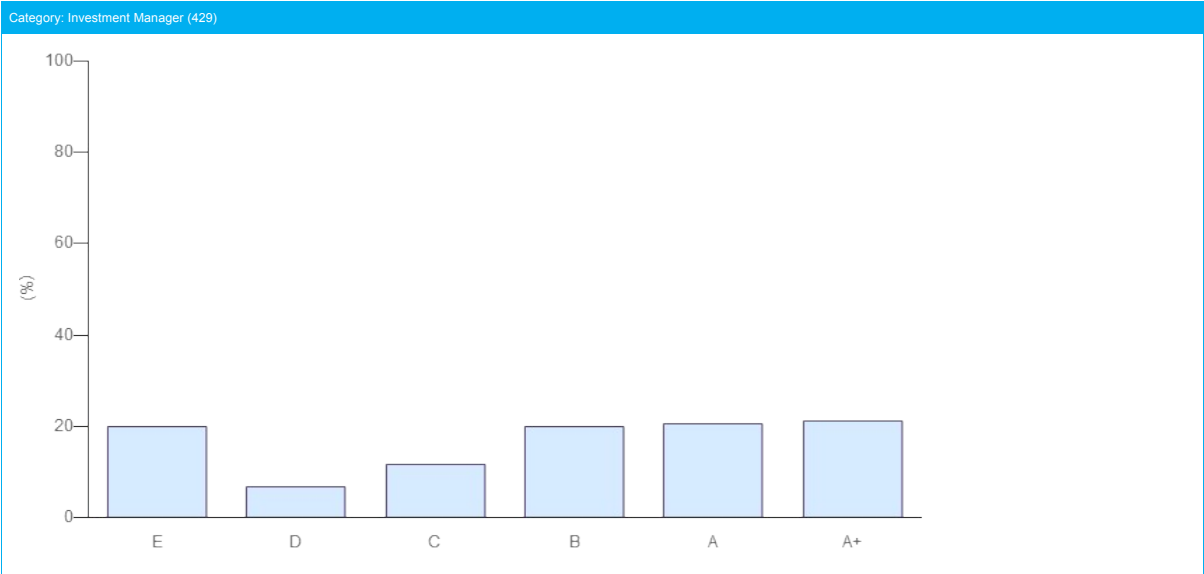
Module	DIRECT - LISTED EQUITY - COLLABORATIVE ENGAGEMENTS
Band	B



COMPARISON WITH PEERS

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

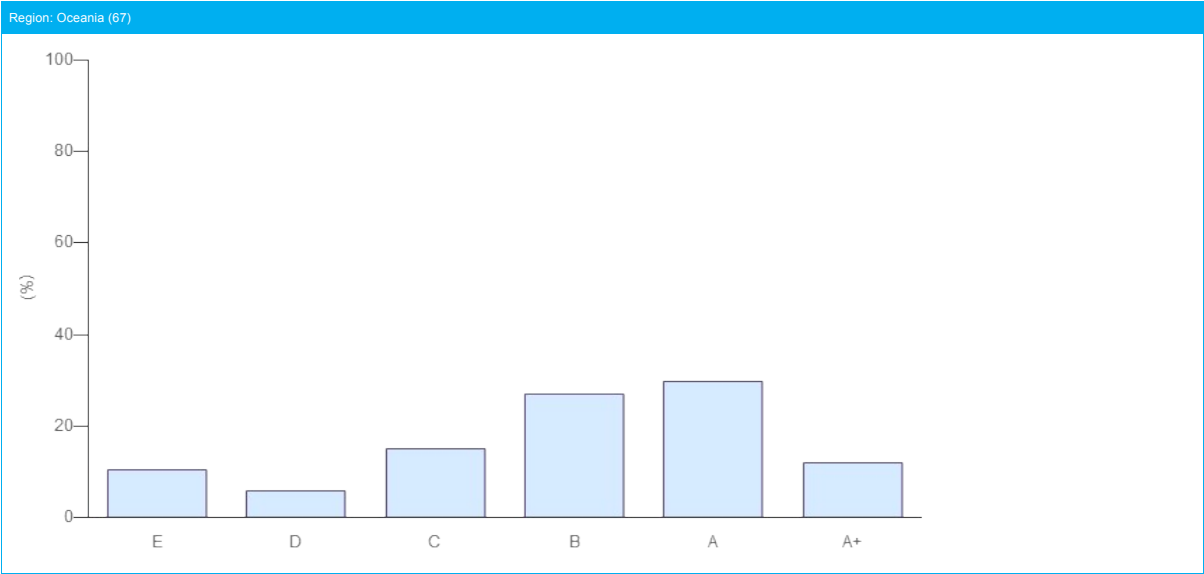
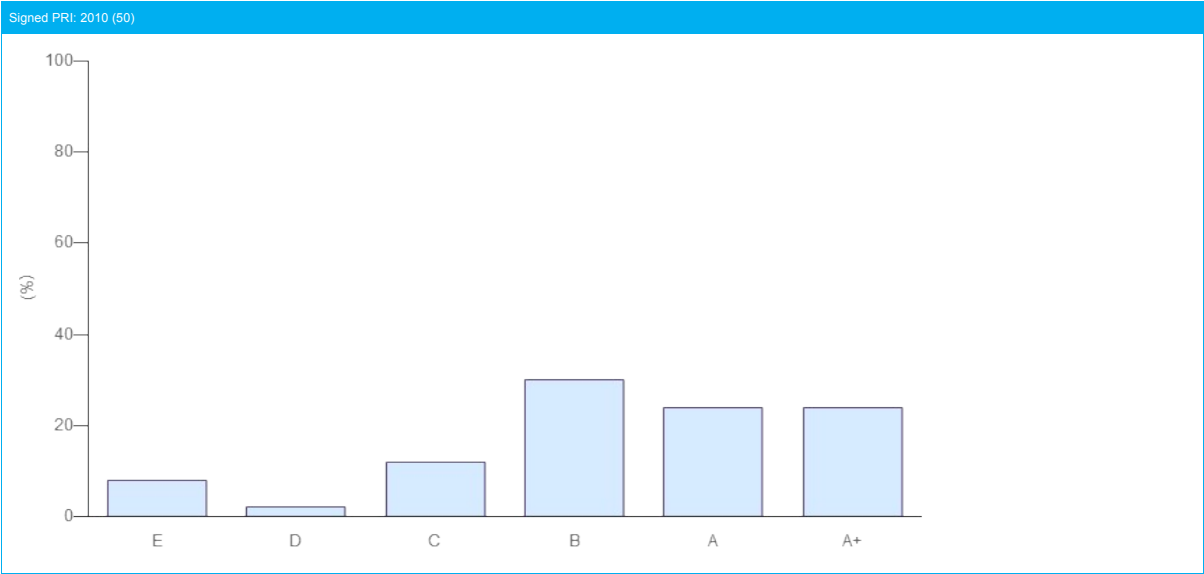
Module	DIRECT - LISTED EQUITY - COLLABORATIVE ENGAGEMENTS
Band	B



COMPARISON WITH PEERS

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

Module	DIRECT - LISTED EQUITY - COLLABORATIVE ENGAGEMENTS
Band	B



Direct - LISTED EQUITY - (PROXY) VOTING

Indicator Scorecard

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

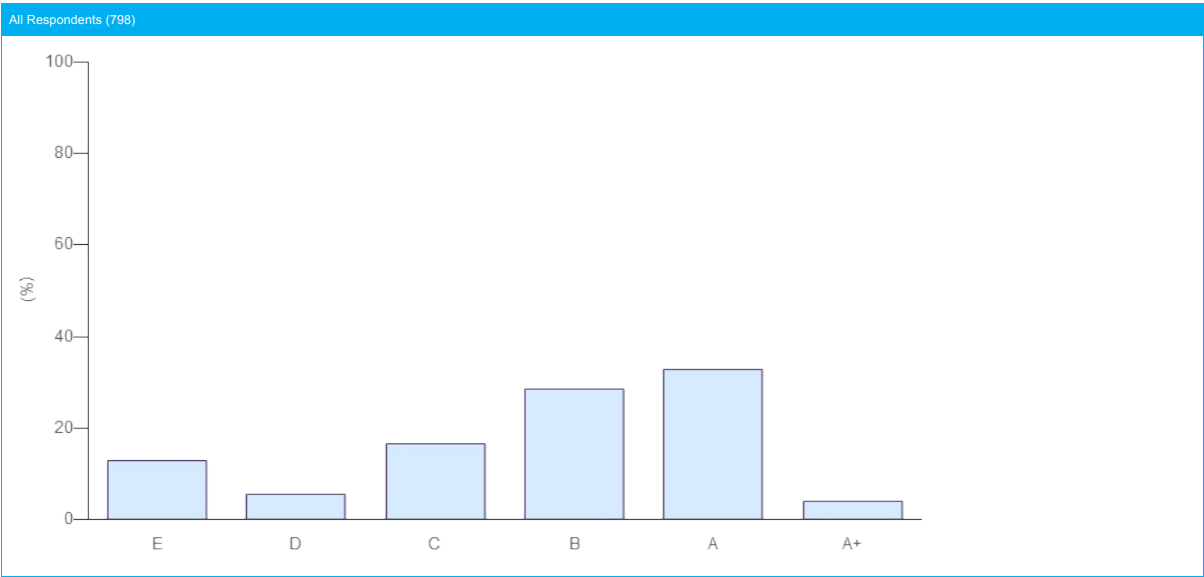
Section	(PROXY) VOTING & SHAREHOLDER RESOLUTIONS
Total Score	14 ★ (out of a maximum 18 ★ from 6 indicators including the following additionally assessed indicators: LEA 22)
Band	A

SECTION	INDICATOR			MEDIAN PEER SCORE (# PEERS)	YOUR SCORE	CHANGE AGAINST LAST YEAR
	NUMBER	TYPE	TOPIC			
PROCESS	LEA 15	CORE	Voting policy	★★★★ (797)	★★★★	—
	LEA 17	ADDITIONAL	Reviewing service provider voting recommendations	☆☆☆ (797)	N/A	—
	LEA 19	ADDITIONAL	Securities lending programme	☆☆☆ (797)	N/A	—
	LEA 20	CORE	Informing companies of the rationale of abstaining/voting against management	★★★★ (797)	★★★★	—
OUTPUTS & OUTCOMES	LEA 21	CORE	Percentage of (proxy) votes cast	★★★★ (797)	★★★★	—
OUTPUTS & OUTCOMES	LEA 22	ADDITIONAL	Voting instructions issued	★★★★ (797)	★★★★	—
COMMUNICATION	SG 19a	CORE	Disclosure of approach to public	★★★★ (797)	☆☆☆	—
	SG 19b	CORE	Disclosure of approach to clients/beneficiaries	☆☆☆ (797)	★★★☆☆	—

COMPARISON WITH PEERS

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

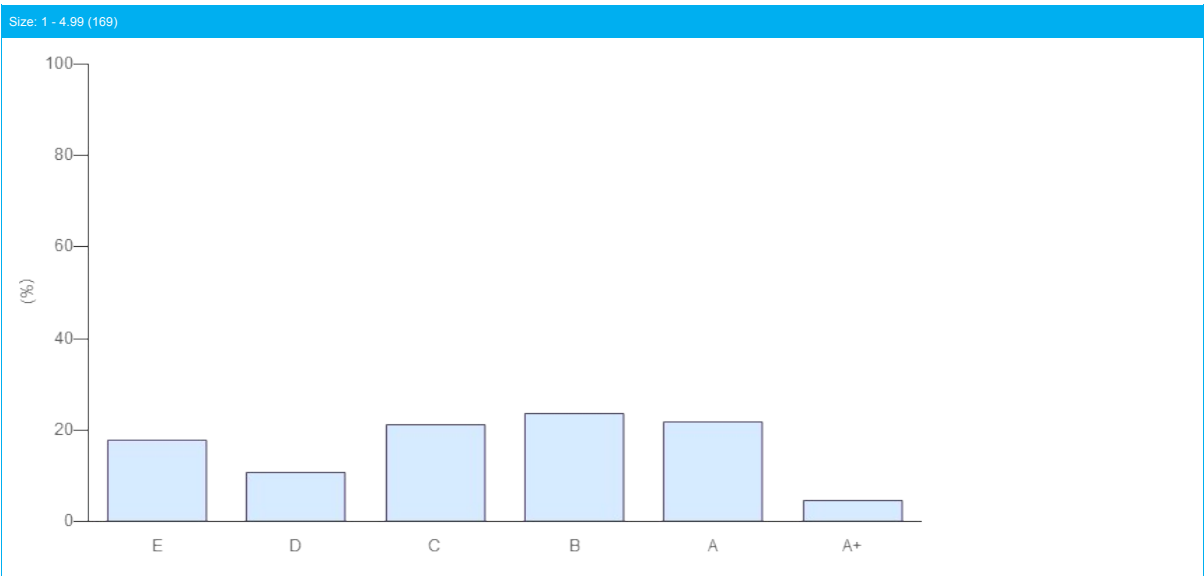
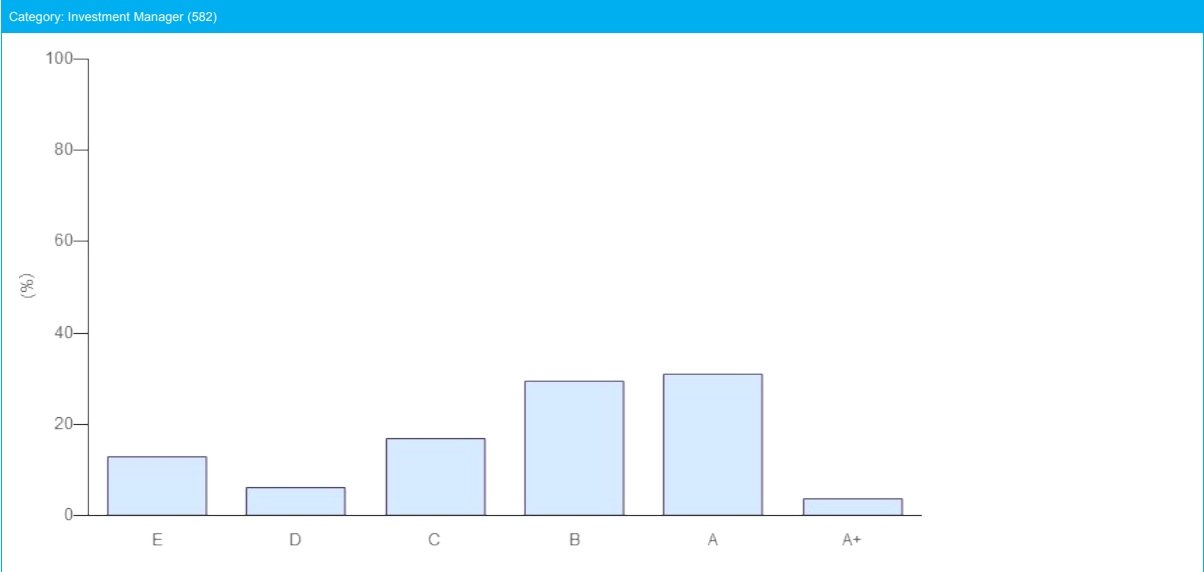
Module	DIRECT - LISTED EQUITY - PROXY VOTING
Band	A



COMPARISON WITH PEERS

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

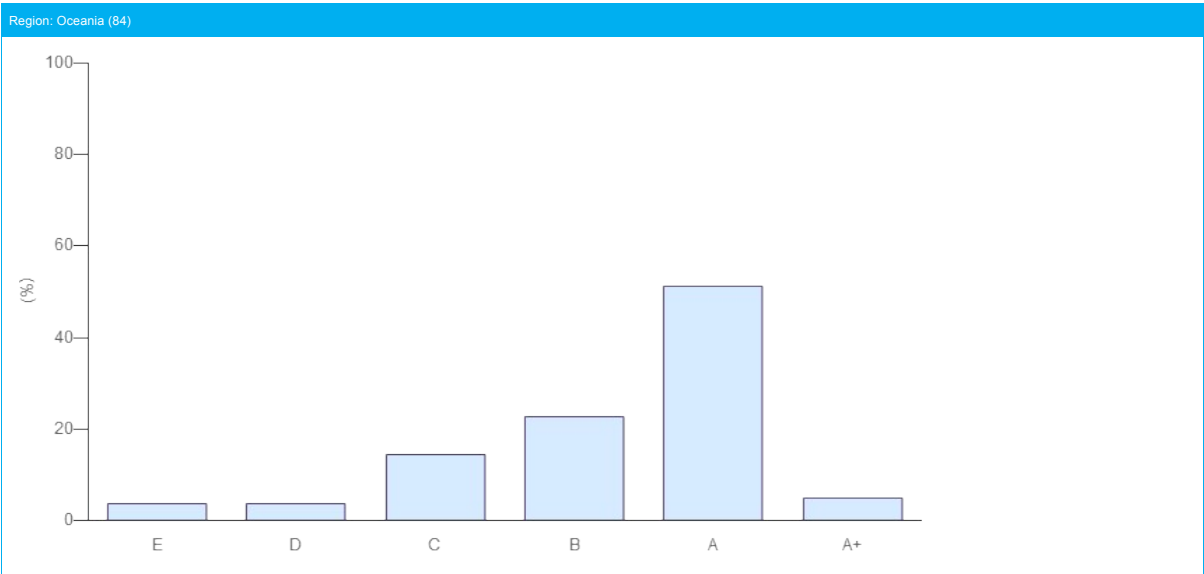
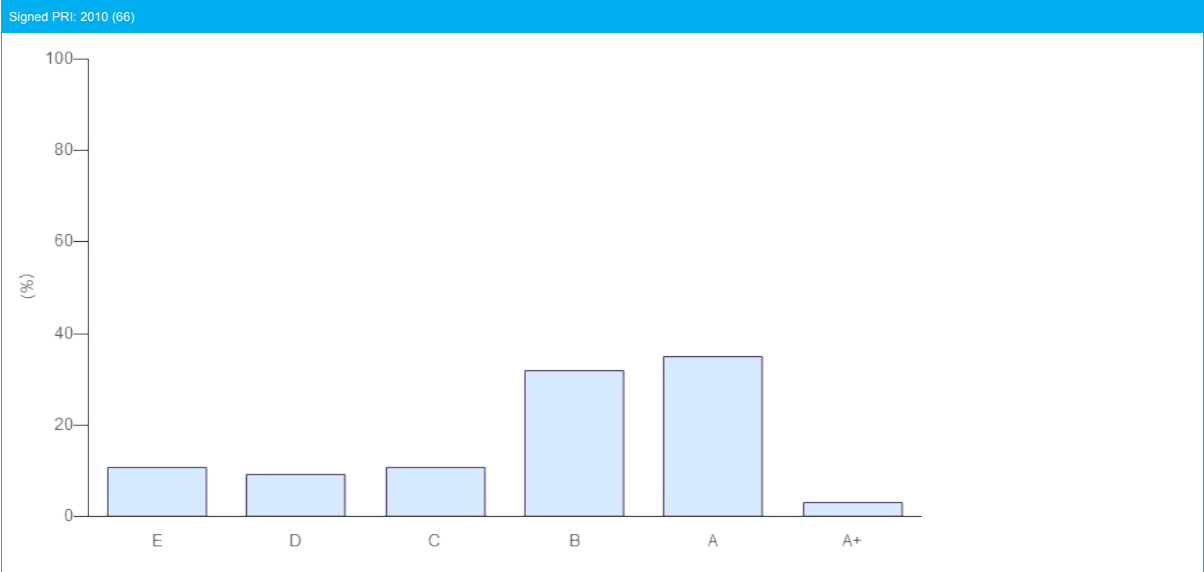
Module	DIRECT - LISTED EQUITY - PROXY VOTING
Band	A



COMPARISON WITH PEERS

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

Module	DIRECT - LISTED EQUITY - PROXY VOTING
Band	A



DIRECT - FIXED INCOME (SSA)

Indicator Scorecard

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

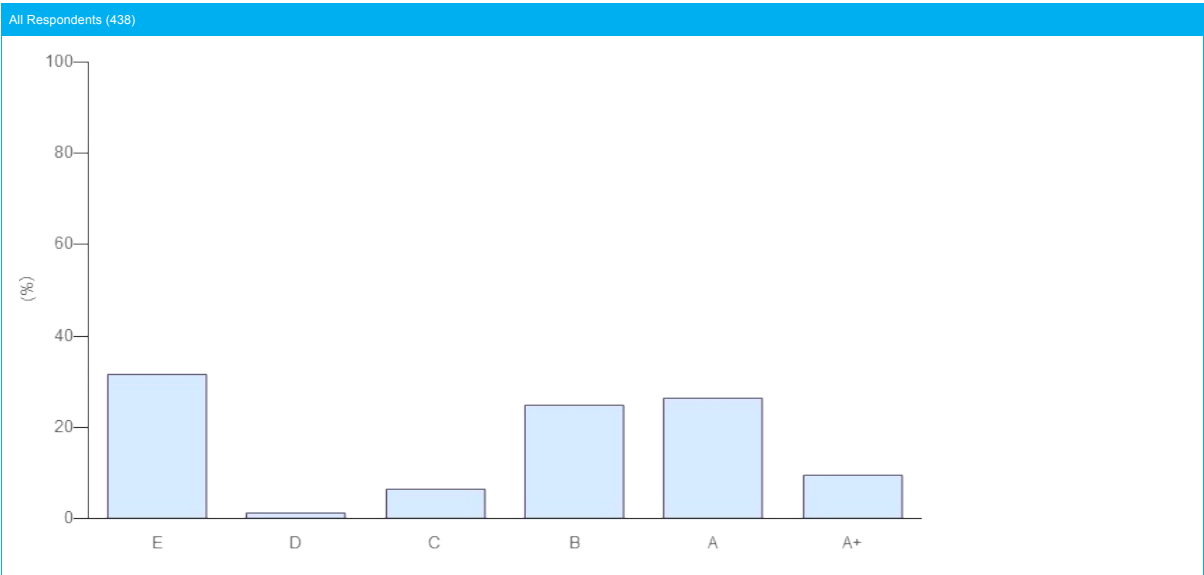
Module	FIXED INCOME (SSA)
Total Score	14 ★ (out of a maximum 21 ★ from 7 indicators including the following additionally assessed indicators: FI 13)
Band	B

SECTION	INDICATOR			MEDIAN PEER SCORE (# PEERS)	YOUR SCORE	CHANGE AGAINST LAST YEAR
	NUMBER	TYPE	TOPIC			
IMPLEMENTATION PROCESSES	FI 02.1	CORE	ESG issues and issuer research	★★★★ (439)	★★★★	—
	FI 02.2	CORE	ESG issues and issuer research	★★★★ (439)	★★★☆☆	—
	FI 03	CORE	Processes to ensure analysis is robust	★★★★ (439)	★★★☆☆	—
IMPLEMENTATION: SCREENING	FI 06	ADDITIONAL	Examples of ESG factors in screening process	☆☆☆☆ (439)	N/A	—
	FI 7a	CORE	Negative Screening - ensuring criteria are met	★★★★ (369)	N/A	—
	FI 7b	CORE	Positive Screening - ensuring criteria are met	☆☆☆☆ (288)	N/A	—
	FI 7c	CORE	Norms Screening - ensuring criteria are met	★★★★ (289)	N/A	—
IMPLEMENTATION: THEMATIC	FI 09	CORE	Thematic investing - themed bond processes	☆☆☆☆ (245)	N/A	—
	FI 10	ADDITIONAL	Thematic investing - assessing impact	☆☆☆☆ (439)	N/A	—
IMPLEMENTATION: INTEGRATION	FI 12	CORE	Integration - ESG information in investment processes	☆☆☆☆ (439)	★★★★	—
	FI 13	ADDITIONAL	Integration - E,S and G issues reviewed	★★★★ (439)	★★★☆☆	—
OUTPUTS AND OUTCOMES	FI 18	ADDITIONAL	Financial/ESG performance	☆☆☆☆ (1450)	☆☆☆☆	—
COMMUNICATION	SG 19a	CORE	Disclosure of approach to public	★★★★ (439)	★★★☆☆	—
	SG 19b	CORE	Disclosure of approach to clients/beneficiaries	☆☆☆☆ (439)	★★★☆☆	↑

COMPARISON WITH PEERS

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

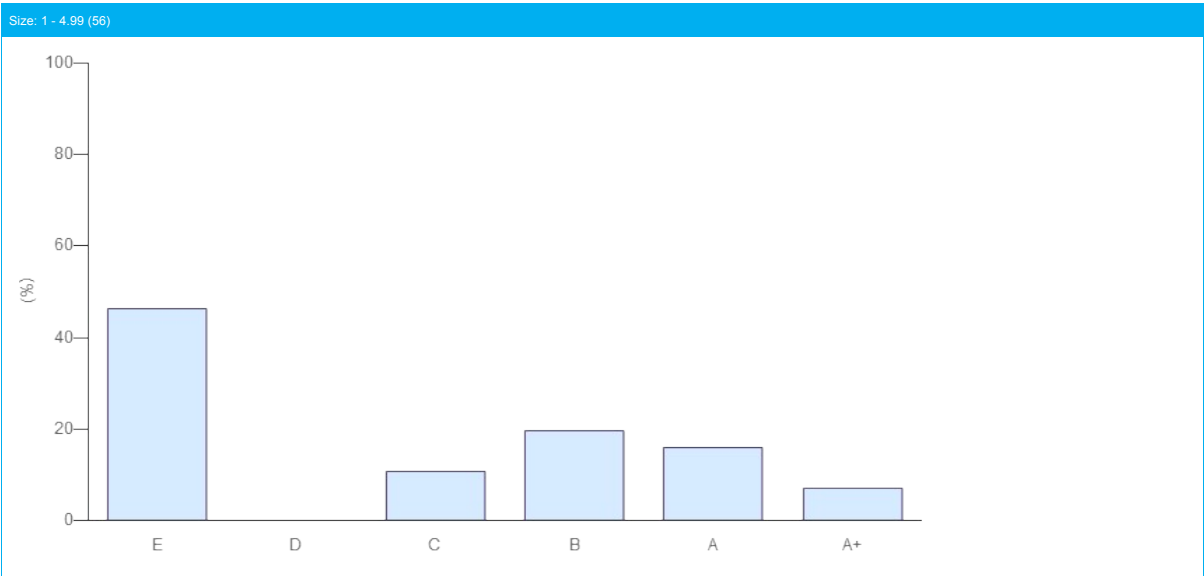
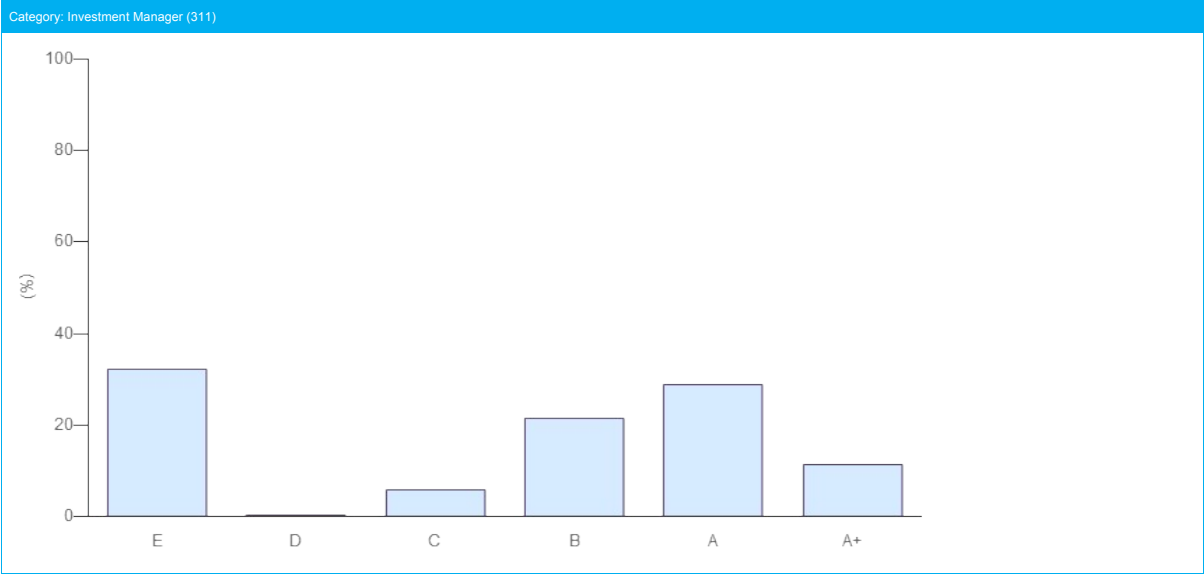
Module	DIRECT - FIXED INCOME SSA
Band	B



COMPARISON WITH PEERS

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

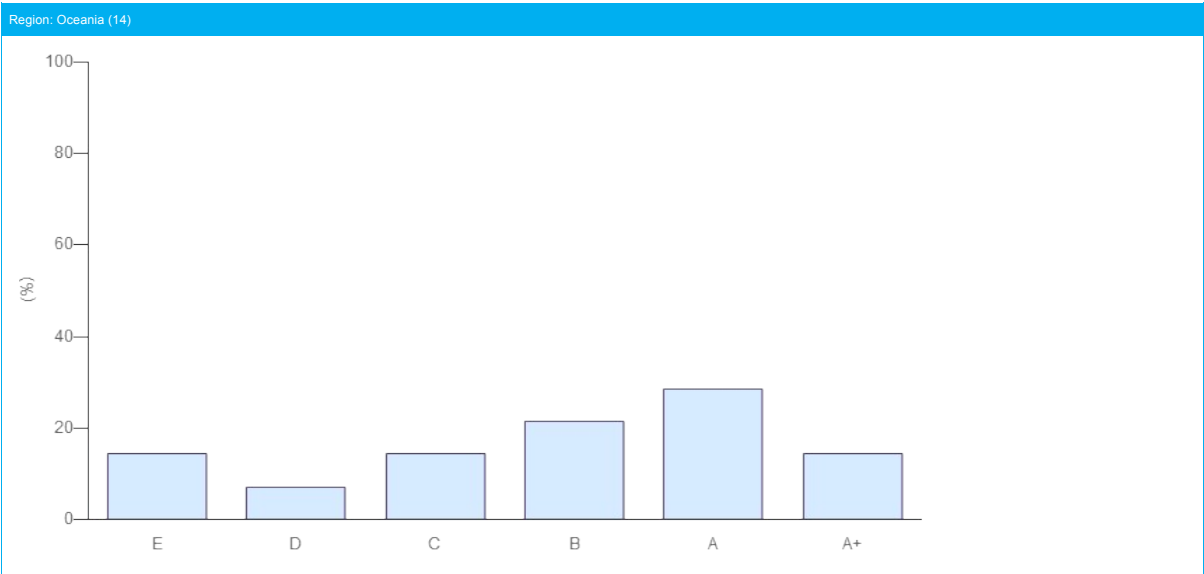
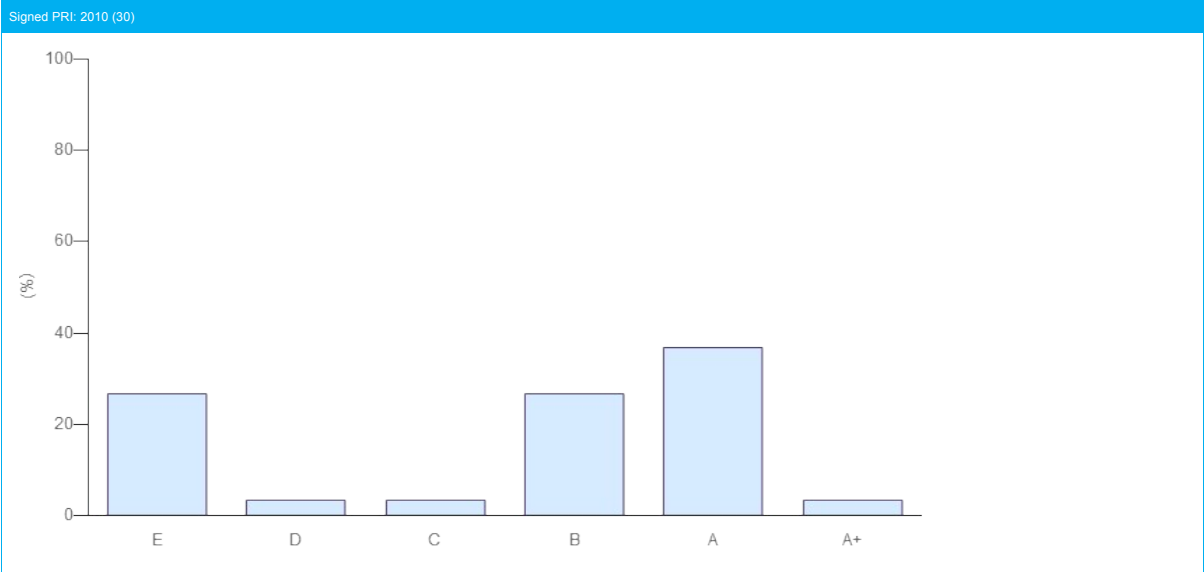
Module	DIRECT - FIXED INCOME SSA
Band	B



COMPARISON WITH PEERS

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

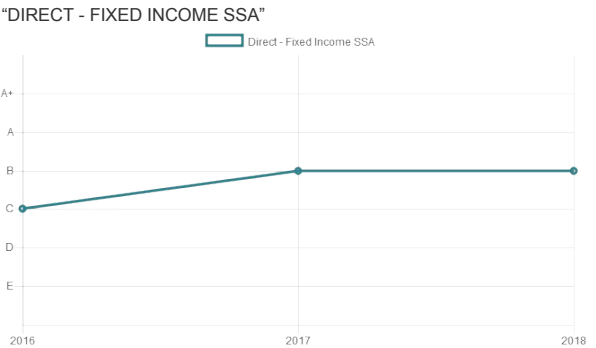
Module	DIRECT - FIXED INCOME SSA
Band	B



Your Company Year-On-Year Performance



Average Year-On-Year Trends



DIRECT - FIXED INCOME CORPORATE (FINANCIAL)

Indicator Scorecard

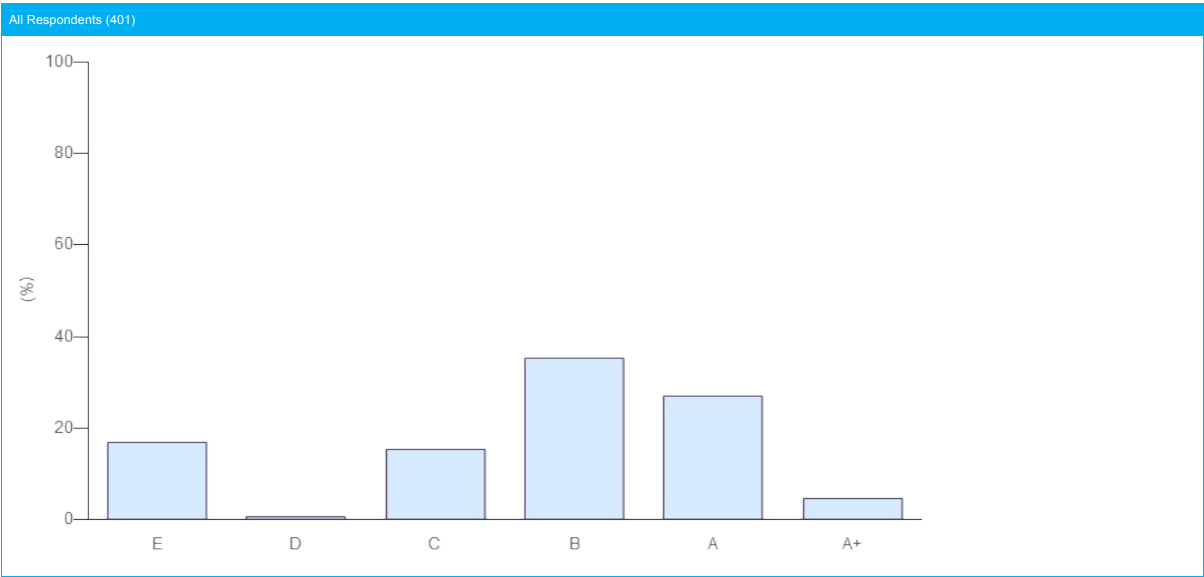
Module	FIXED INCOME CORPORATE (FINANCIAL)
Total Score	18 ★ (out of a maximum 30 ★ from 10 indicators including the following additionally assessed indicators: FI 13, FI 17, FI 16)
Band	B

SECTION	INDICATOR			MEDIAN PEER SCORE (# PEERS)	YOUR SCORE	CHANGE AGAINST LAST YEAR
	NUMBER	TYPE	TOPIC			
IMPLEMENTATION PROCESSES	FI 02.1	CORE	ESG issues and issuer research	★★★ (401)	★★★	↓
	FI 02.2	CORE	ESG issues and issuer research	★★★ (401)	★★★	—
	FI 03	CORE	Processes to ensure analysis is robust	★★★ (401)	★★★	—
IMPLEMENTATION: SCREENING	FI 06	ADDITIONAL	Examples of ESG factors in screening process	☆☆☆ (401)	N/A	—
	FI 7a	CORE	Negative Screening - ensuring criteria are met	★★★ (328)	N/A	—
	FI 7b	CORE	Positive Screening - ensuring criteria are met	★★★ (230)	N/A	—
	FI 7c	CORE	Norms Screening - ensuring criteria are met	★★★ (235)	N/A	—
IMPLEMENTATION: THEMATIC	FI 09	CORE	Thematic investing - themed bond processes	☆☆☆ (173)	N/A	—
	FI 10	ADDITIONAL	Thematic investing - assessing impact	☆☆☆ (401)	N/A	—
IMPLEMENTATION: INTEGRATION	FI 12	CORE	Integration - ESG information in investment processes	★★★ (401)	★★★★	—
	FI 13	ADDITIONAL	Integration - E,S and G issues reviewed	★★★ (401)	★★★★	↑
ENGAGEMENT	FI 15	CORE	Engagement overview and coverage	☆☆☆ (401)	☆☆☆	—
	FI 16	ADDITIONAL	Engagement method	★★★ (401)	★★★	↑
	FI 17	ADDITIONAL	Engagement policy disclosure	☆☆☆ (401)	★★★★	↑
OUTPUTS AND OUTCOMES	FI 18	ADDITIONAL	Financial/ESG performance	☆☆☆ (401)	☆☆☆	—
COMMUNICATION	SG 19a	CORE	Disclosure of approach to public	★★★ (401)	★★★	—
	SG 19b	CORE	Disclosure of approach to clients/beneficiaries	☆☆☆ (401)	★★★	↑

COMPARISON WITH PEERS

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

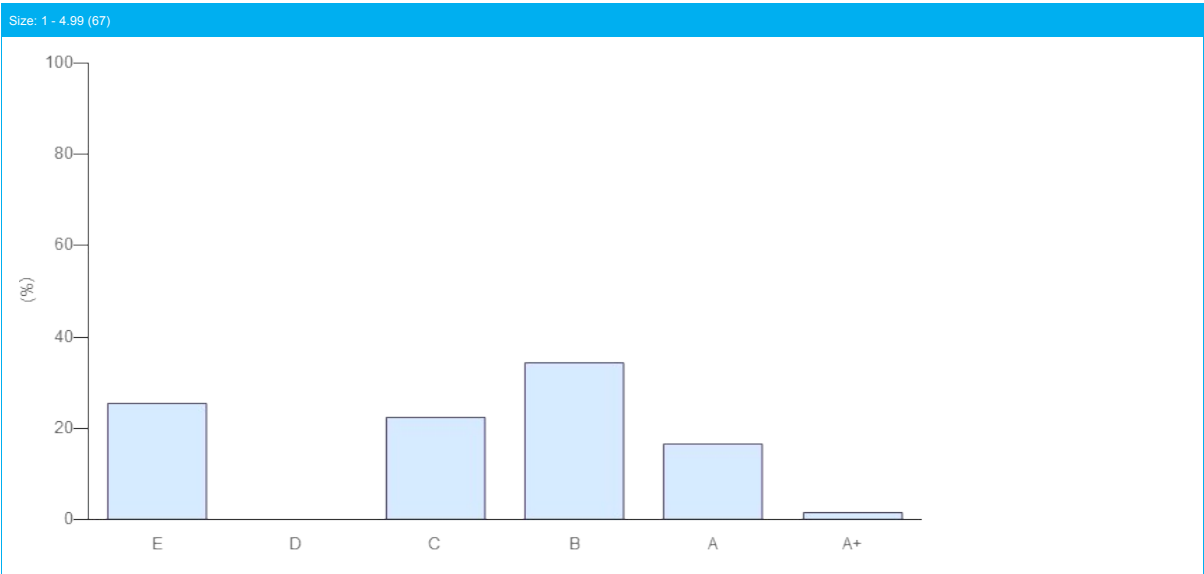
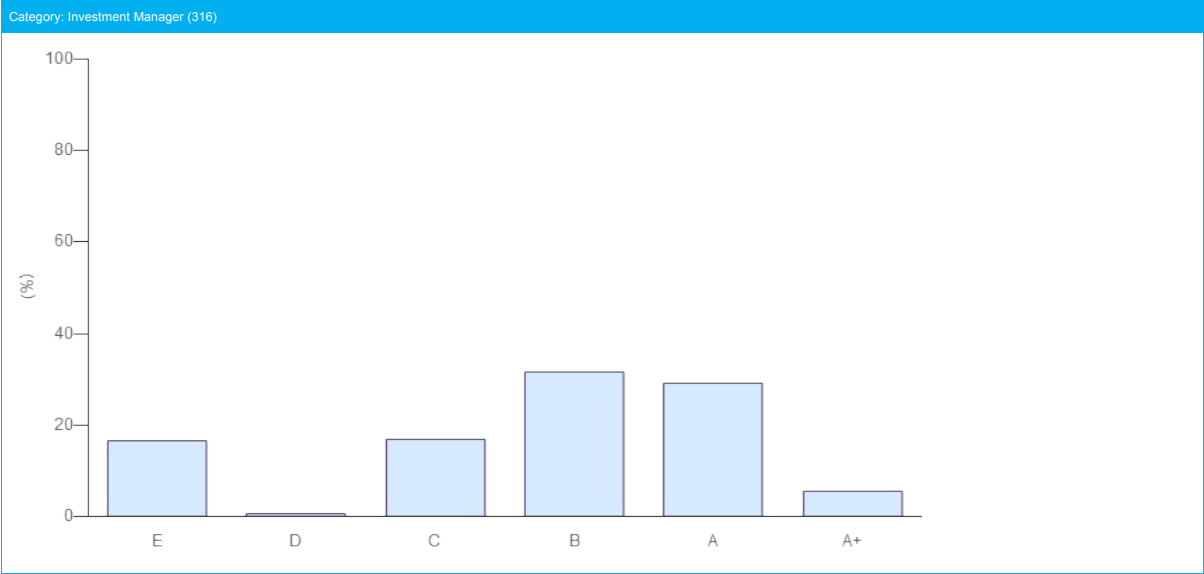
Module	DIRECT - FIXED INCOME CORPORATE FINANCIAL
Band	B



COMPARISON WITH PEERS

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

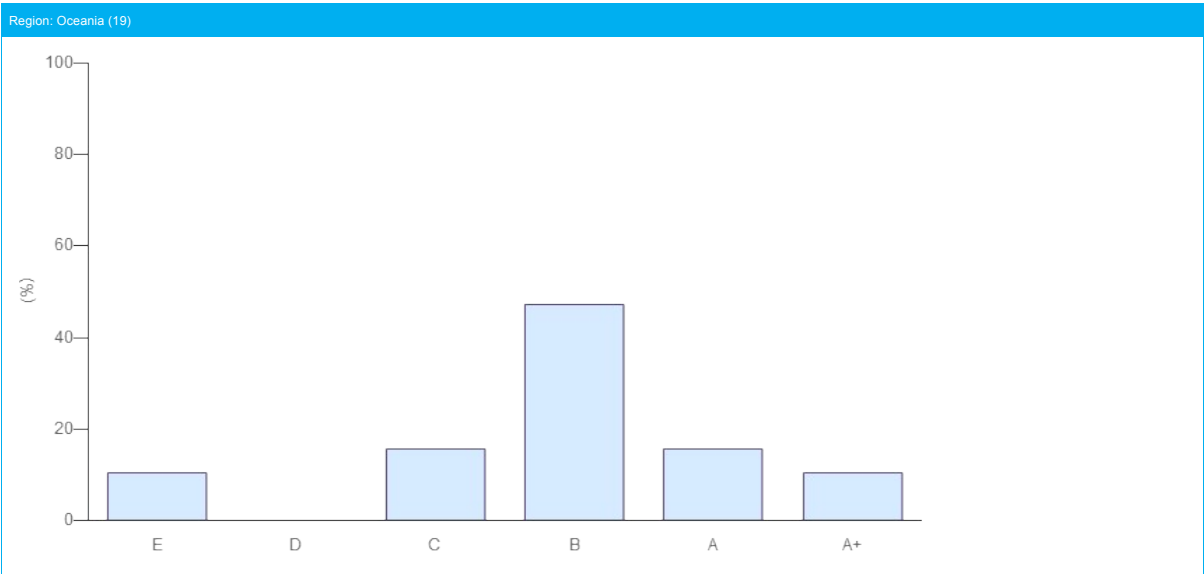
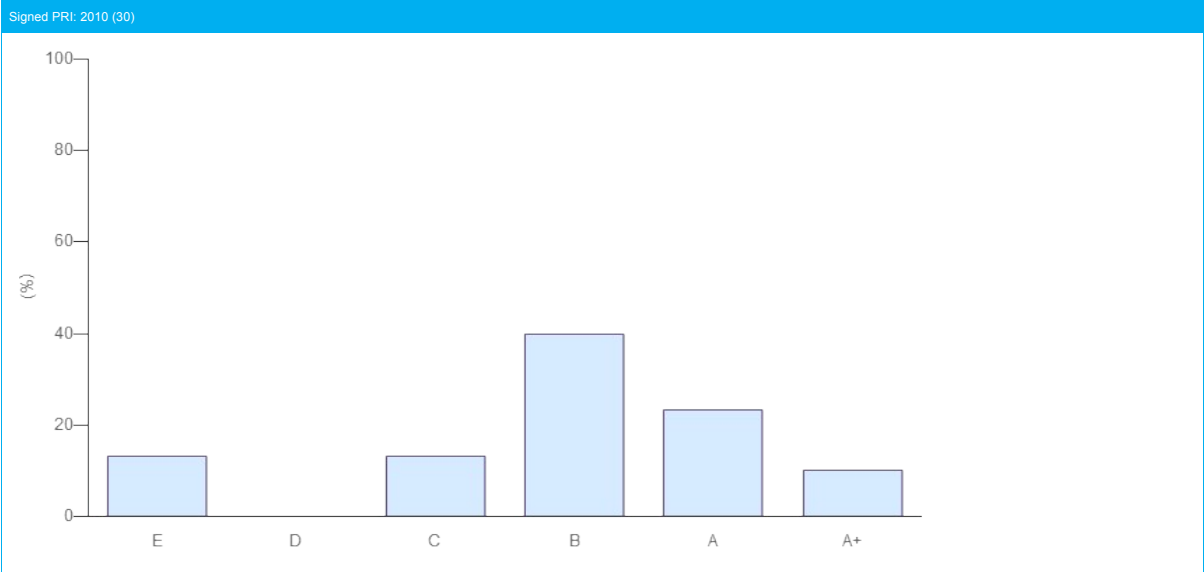
Module	DIRECT - FIXED INCOME CORPORATE FINANCIAL
Band	B



COMPARISON WITH PEERS

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

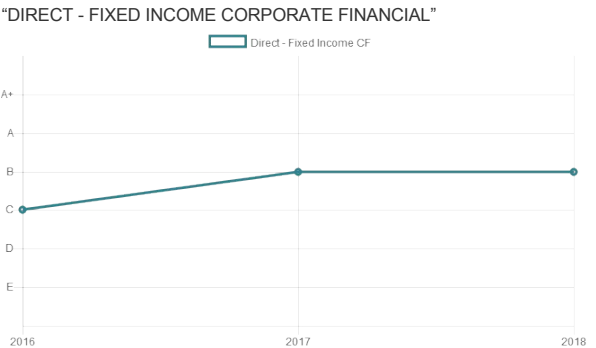
Module	DIRECT - FIXED INCOME CORPORATE FINANCIAL
Band	B



Your Company Year-On-Year Performance



Average Year-On-Year Trends



DIRECT - FIXED INCOME CORPORATE (NON-FINANCIAL)

Indicator Scorecard

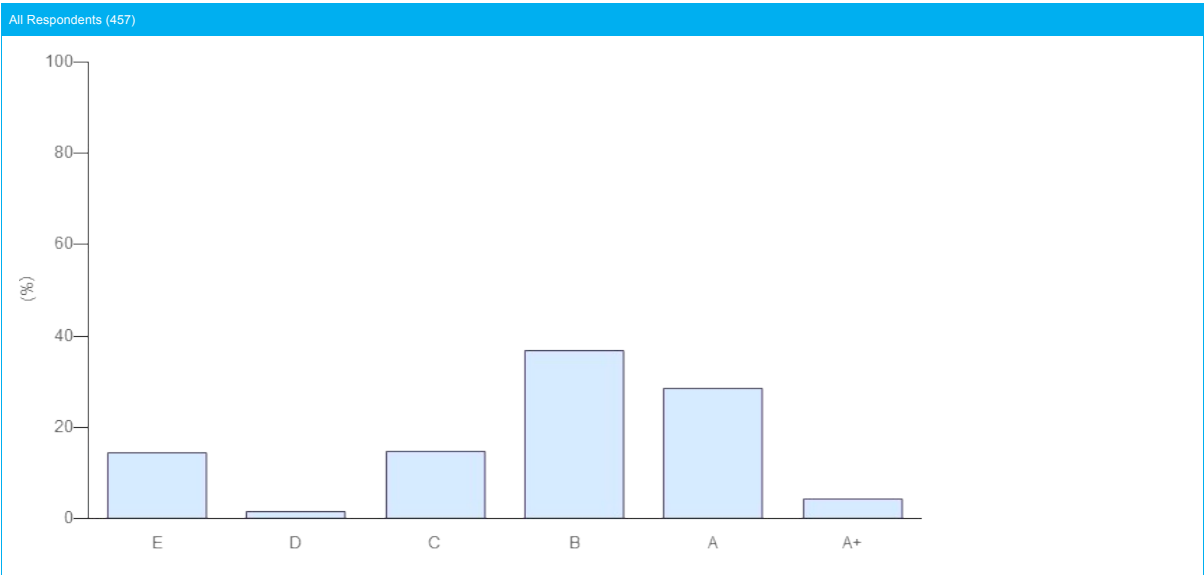
Module	FIXED INCOME CORPORATE (NON-FINANCIAL)
Total Score	20 ★ (out of a maximum 30 ★ from 10 indicators including the following additionally assessed indicators: FI 13, FI 17, FI 16)
Band	B

SECTION	INDICATOR			MEDIAN PEER SCORE (# PEERS)	YOUR SCORE	CHANGE AGAINST LAST YEAR
	NUMBER	TYPE	TOPIC			
IMPLEMENTATION PROCESSES	FI 02.1	CORE	ESG issues and issuer research	★★★★ (457)	★★★★	—
	FI 02.2	CORE	ESG issues and issuer research	★★★★ (457)	★★★☆☆	—
	FI 03	CORE	Processes to ensure analysis is robust	★★★☆☆ (457)	★★★☆☆	—
IMPLEMENTATION: SCREENING	FI 06	ADDITIONAL	Examples of ESG factors in screening process	☆☆☆☆ (457)	N/A	—
	FI 07a	CORE	Negative Screening - ensuring criteria are met	★★★★ (374)	N/A	—
	FI 07b	CORE	Positive Screening - ensuring criteria are met	★★★☆☆ (250)	N/A	—
	FI 07c	CORE	Norms Screening - ensuring criteria are met	★★★☆☆ (266)	N/A	—
IMPLEMENTATION: THEMATIC	FI 09	CORE	Thematic investing - themed bond processes	★★★☆☆ (186)	N/A	—
	FI 10	ADDITIONAL	Thematic investing - assessing impact	☆☆☆☆ (457)	N/A	—
IMPLEMENTATION: INTEGRATION	FI 12	CORE	Integration - ESG information in investment processes	★★★★ (457)	★★★★	—
	FI 13	ADDITIONAL	Integration - E,S and G issues reviewed	★★★★ (457)	★★★★	⬆
ENGAGEMENT	FI 15	CORE	Engagement overview and coverage	☆☆☆☆ (457)	★★★☆☆	—
	FI 16	ADDITIONAL	Engagement method	★★★☆☆ (457)	★★★☆☆	—
	FI 17	ADDITIONAL	Engagement policy disclosure	☆☆☆☆ (457)	★★★★	⬆
OUTPUTS AND OUTCOMES	FI 18	ADDITIONAL	Financial/ESG performance	☆☆☆☆ (457)	☆☆☆☆	—
COMMUNICATION	SG 19a	CORE	Disclosure of approach to public	★★★☆☆ (457)	★★★☆☆	—
	SG 19b	CORE	Disclosure of approach to clients/beneficiaries	☆☆☆☆ (457)	★★★☆☆	⬆

COMPARISON WITH PEERS

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

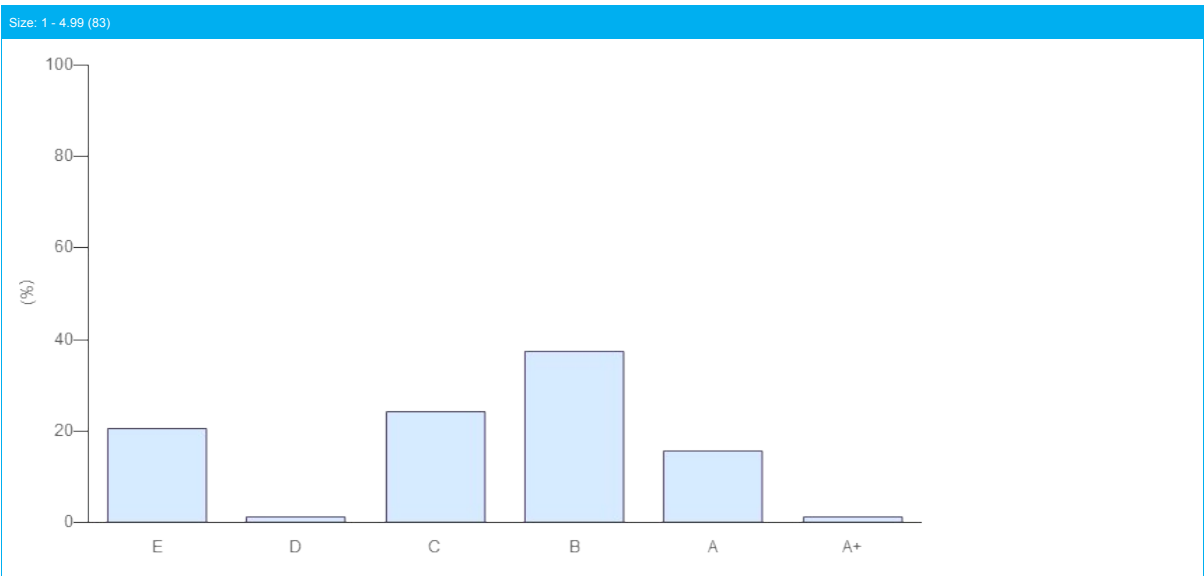
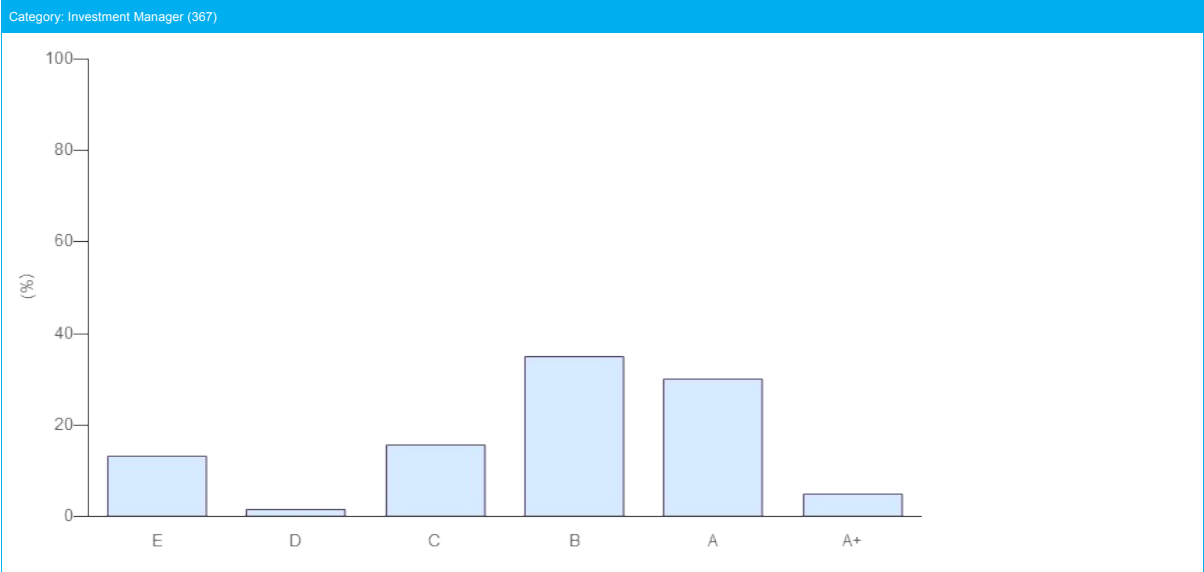
Module	DIRECT - FIXED INCOME CORPORATE NON-FINANCIAL
Band	B



COMPARISON WITH PEERS

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

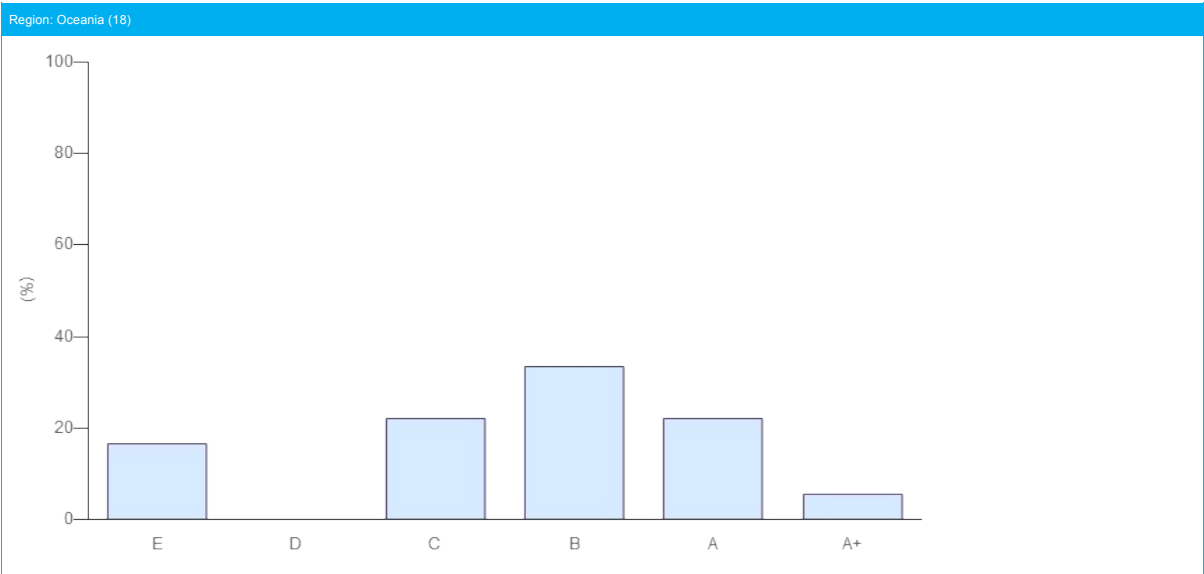
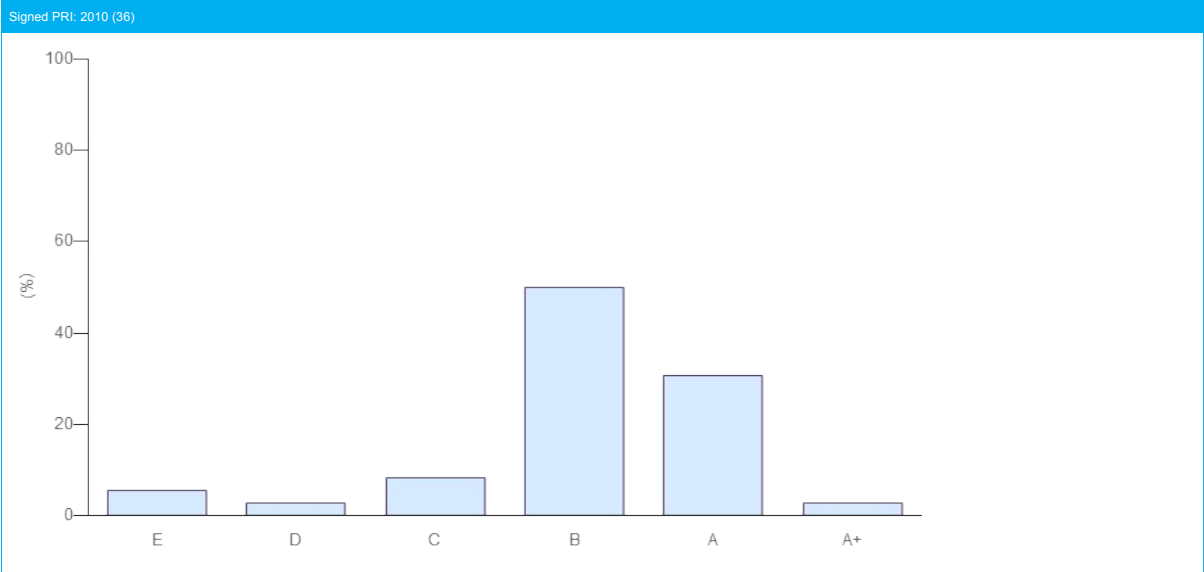
Module	DIRECT - FIXED INCOME CORPORATE NON-FINANCIAL
Band	B



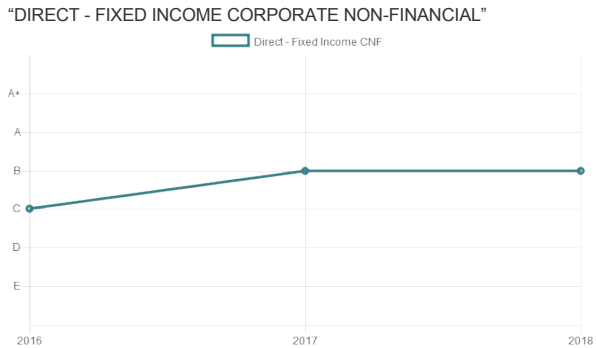
COMPARISON WITH PEERS

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

Module	DIRECT - FIXED INCOME CORPORATE NON-FINANCIAL
Band	B



Your Company Year-On-Year Performance



Average Year-On-Year Trends

