



PRIVATE RI REPORT

2020

Sanlam Investment Management (SIM)

About this report

This report is an export of the individual Signatory organisation responses to the PRI Reporting Framework during the reporting period specified above. 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.

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OO 01.1	Select the services and funds you offer
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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 01.2	Additional information. [Optional]
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Sanlam Investment Group (SIG) incorporates the Sanlam Group's investment-related businesses, ensuring business practices and performances are aligned with the Group. The business is diversified across a broad range of specialist investment businesses. Its areas of expertise include conventional asset management, index and smart beta investments, alternative investment solutions, collective investment schemes, property asset management, private client investment management and stock broking, multi-management, structured products (including guaranteed products), private equity and offshore investment management.

Sanlam Investments (SI), part of the Sanlam Investment Group (SIG), houses all of Sanlam's domestic 3rd party investment capabilities as well as the distribution and business enablement functions. It's areas of expertise include conventional asset management, index and smart beta investments, alternative investments and multi-management.

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

OO 02.2	Indicate the number of countries in which you have offices (including your headquarters).
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- 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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380

OO 02.4	Additional information. [Optional]
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Within the Sanlam Investment Group there are currently approximately 880 employees. Applicable to this report, there are approximately 380 employees within Sanlam Investments, the third party investment business within the Sanlam Investment Group.

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 03.3	Additional information. [Optional]
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Sanlam Investments, part of the Sanlam Investment Group, is an operational cluster of Sanlam Limited.
 Sanlam Limited is an Asset Owner signatory.

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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Total AUM
 518,945,166,702 ZAR

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 04.5 Additional information. [Optional]

The AUM is provided for the Sanlam Investments business, excluding the Multi-Manager division.

OO 05 Mandatory to Report, Voluntary to Disclose Gateway General

OO 05.1 Provide an approximate percentage breakdown of your AUM at the end of your reporting year using the following asset classes and investment strategies:

	Internally managed (%)	Externally managed (%)
Listed equity	10-50%	0
Fixed income	10-50%	0
Private equity	0	0
Property	<10%	0
Infrastructure	0	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	10-50%	0
Money market instruments	0	0
Other (1), specify	0	0
Other (2), specify	0	0

OO 06 Mandatory Descriptive General

OO 06.1 Select how you would like to disclose your asset class mix.

- 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 07 Mandatory to Report, Voluntary to Disclose Gateway General

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	55	SSA
	35	Corporate (financial)
	10	Corporate (non-financial)
	0	Securitised

OO 09	Mandatory	Peering	General
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OO 09.1	Indicate the breakdown of your organisation's AUM by market.
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10	Developed Markets
90	Emerging Markets
0	Frontier Markets
0	Other Markets

OO 09.2	Additional information. [Optional]
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The majority of assets managed are domiciled in South Africa which we consider an emerging market.

OO 10	Mandatory	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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Listed equity – engagement

- 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.

Listed equity – voting

- We cast our (proxy) votes directly or via dedicated voting providers
- We do not cast our (proxy) votes directly and do not require external managers to vote on our behalf

Fixed income SSA – engagement

- We engage with SSA bond issuers on ESG factors via our staff, collaborations or service providers.
- We do not engage directly and do not require external managers to engage with SSA bond issuers on ESG factors. Please explain why you do not.

Please explain why you do not engage directly and do not require external managers to engage with companies on ESG factors.

We engage companies on ESG factors for our equity holdings but have not yet started engaging companies on ESG factors within our fixed income holdings.

Fixed income Corporate (financial) – engagement

- 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.

Fixed income Corporate (non-financial) – engagement

- 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	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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Listed equity

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

	Fixed income - SSA
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
	Fixed income - corporate (financial)
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
	Fixed income - corporate (non-financial)
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
	Property
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
	Cash
<input type="checkbox"/>	We address ESG incorporation.
<input checked="" type="checkbox"/>	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.
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	Core modules
<input checked="" type="checkbox"/>	Organisational Overview
<input checked="" type="checkbox"/>	Strategy and Governance
	RI implementation directly or via service providers
	Direct - Listed Equity incorporation
<input checked="" type="checkbox"/>	Listed Equity incorporation
	Direct - Listed Equity active ownership
<input checked="" type="checkbox"/>	Engagements
<input checked="" type="checkbox"/>	(Proxy) voting
	Direct - Fixed Income
<input checked="" type="checkbox"/>	Fixed income - SSA
<input checked="" type="checkbox"/>	Fixed income - Corporate (financial)
<input checked="" type="checkbox"/>	Fixed income - Corporate (non-financial)
	Direct - Other asset classes with dedicated modules
<input type="checkbox"/>	Property
	Closing module
<input checked="" type="checkbox"/>	Closing module

OO 12.2	Additional information. [Optional]
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N/A

OO LE 01	Mandatory to Report, Voluntary to Disclose	Gateway	General
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OO LE 01.1	Provide a breakdown of your internally managed listed equities by passive, active - quantitative (quant), active - fundamental and active - other strategies.
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10

	Passive
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0

	Active - quantitative (quant)
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90

	Active - fundamental and active - other
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OO LE 01.2	Additional information. [Optional]
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10% Satrix which is the index tracking and smart beta investment business within Sanlam Investments.

OO FI 01.1	Provide a breakdown of your internally managed fixed income securities by active and passive strategies		
SSA	<input type="checkbox"/>	Passive	0
	<input type="checkbox"/>	Active - quantitative (quant)	0
	<input type="checkbox"/>	Active - fundamental and active - other	100
Corporate (financial)	<input type="checkbox"/>	Passive	0
	<input type="checkbox"/>	Active - quantitative (quant)	0
	<input type="checkbox"/>	Active - fundamental and active - other	100
Corporate (non-financial)	<input type="checkbox"/>	Passive	0
	<input type="checkbox"/>	Active - quantitative (quant)	0
	<input type="checkbox"/>	Active - fundamental and active - other	100

OO FI 03.1	Indicate the approximate (+/- 5%) breakdown of your SSA investments, by developed markets and emerging markets.		
SSA	<input type="checkbox"/>	Developed markets	0
	<input type="checkbox"/>	Emerging markets	100

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

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

OO PR 01.1 Indicate the level of ownership you typically hold in your property investments.

- a majority stake (50% and above)
- a significant minority stake (10 and above, and under 50%)
- a limited minority stake (<10%)
- a mix of ownership stakes
- N/A, we manage properties, new constructions and/or refurbishments on behalf of our clients, but do not hold equity in property on their behalf

OO PR 01.2 Provide a breakdown of your organisations allocation to Real Estate Investment Trusts (REITs) or similar

- >50%
- 10 – 50%
- <10%
- 0%

OO PR 02.1 Provide a breakdown of your organisation’s property assets based on who manages the assets.

Property assets managed by	Breakdown of your property assets (by number)
Managed directly by your organisation	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%
Managed via third-party property managers appointed by you	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%
Managed by other investors or their property managers	<input checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%
Managed by tenant(s) with operational control	<input type="radio"/> > 50% <input type="radio"/> 10-50% <input type="radio"/> < 10% <input checked="" type="radio"/> 0%
Total 100%	

OO PR 03	Mandatory to Report, Voluntary to Disclose	Descriptive	General
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OO PR 03.1 Indicate up to three of your largest property types by AUM.

Types	Main property types (by AUM)
Largest property type	<input type="radio"/> Industrial <input type="radio"/> Retail <input type="radio"/> Office <input type="radio"/> Residential <input type="radio"/> Leisure/Hotel <input checked="" type="radio"/> Mixed use <input type="radio"/> Other, specify
Second largest property type	<input type="radio"/> Industrial <input type="radio"/> Retail <input type="radio"/> Office <input type="radio"/> Residential <input type="radio"/> Leisure/Hotel <input checked="" type="radio"/> Mixed use <input type="radio"/> Other, specify
Third largest property type	<input type="radio"/> Industrial <input type="radio"/> Retail <input type="radio"/> Office <input type="radio"/> Residential <input type="radio"/> Leisure/Hotel <input checked="" type="radio"/> Mixed use <input type="radio"/> Other, specify

OO 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.

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

Yes

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

Policy components/types	Coverage by AUM
<input checked="" type="checkbox"/> Policy setting out your overall approach	<input type="radio"/> Applicable policies cover all AUM <input checked="" type="radio"/> Applicable policies cover a majority of AUM <input type="radio"/> Applicable policies cover a minority of AUM
<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 checked="" type="checkbox"/> Fiduciary (or equivalent) duties	
<input checked="" type="checkbox"/> Asset class-specific RI guidelines	
<input type="checkbox"/> Sector specific RI guidelines	
<input type="checkbox"/> Screening / exclusions policy	
<input checked="" type="checkbox"/> Other, specify (1) Conflict of Interest Policy	
<input type="checkbox"/> Other, specify(2)	

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

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

Our philosophy is to make use of investment opportunities created when prices differ from their fair value. To do this, we estimate what investments are intrinsically worth, as opposed to what investors are willing to pay for them because of greed or fear, and invest accordingly. We believe that by applying this pragmatic-value approach consistently over the long term, we will deliver long-term investment performance for our clients.

We also acknowledge that non-financial issues may influence valuations and capital allocation decisions. These issues typically relate to the quality of companies' relationships with their broader stakeholders and their responsible stewardship of natural resources, as well as their own governance. The implication is that companies that manage their sustainability issues well will outperform their peers. Accordingly, we embed sustainability into our core investment process in order to better understand the potential for companies to deliver their cash flows into the future. This entails broadening and extending our investment horizons.

Please refer to SG 01.06 for our interpretation of fiduciary duties.

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]

We incorporate ESG into our core investment process, as members of PRI.

SG 01.3 (Understanding and incorporating client / beneficiary sustainability preferences)

We cover this by allowing clients to have their own preferences on sustainability issues. This is currently exercised in the way we vote as we have different policies/ preferences for specific clients. We also state in the 'policy', that the policy is not exhaustive, but reflect our values on shareholder powers and responsibilities which we exercise in consultation with our clients, who are the asset owners. The Policy definitely acknowledges that there may be a client preference and I think we are ok we if tick this one too.

No

SG 01.6 Additional information [Optional].

We participated in the development of the PRI's fiduciary roadmap for SA. We will develop relationships with industry bodies and regulators (ASISA, Batseta, the FSB, JSE etc.) to engage and participate in decisions which concern our clients and impact on our industry and beyond. Our fiduciary duty is to act in the best interests of clients and address conflicts of interest between them and our business. The UN SDGs provide a lens to consider our impacts on the real economy. We participated in discussion with the PRI last year on how best SA investors can contribute. Initial contributions by investors are most likely to be based on responsible debt investing. Parent Sanlam tracks 7 of the SDGs.

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.
<input checked="" type="radio"/> Yes	
Describe the identified transition and physical climate-related risks and opportunities and how they have been factored into the investment strategies/products.	
<p>Sanlam investments acknowledges physical and transition (risks and the opportunity set) relating to climate change, however has not formerly factored this into investment strategies and products at this stage.</p>	
<input type="radio"/> No	
SG 01.7 CC	Indicate whether the organisation has assessed the likelihood and impact of these climate risks?
<input type="radio"/> Yes <input checked="" type="radio"/> No	
Describe why your organisation has not yet assessed the likelihood and impact of climate risks	
<p>Sanlam investments has not assessed the likelihood and impact of climate risk. We do however accept the scientific consensus on the need for a 1.5-degree Celsius target. We acknowledge climate action needs to be taken and that there is a global transition that is required to achieve that.</p>	
SG 01.8 CC	Indicate whether the organisation publicly supports the TCFD?
<input type="radio"/> Yes <input checked="" type="radio"/> No	
Explain the rationale	
<p>Sanlam investments acknowledges the TCFD and the role it plays to help companies disclose financial risks associated with the impact of environment issues, however has not formerly committed to, and reported on this initiative.</p>	
SG 01.9 CC	Indicate whether there is an organisation-wide strategy in place to identify and manage material climate-related risks and opportunities.
<input checked="" type="radio"/> Yes	
Describe	
<p>Sanlam Investments considers all risks, including climate-related risks and opportunities in the investment process, and operations of the business. In relation to Sanlam Investments' operations, this is managed through the BAU risk management process for the investment cluster.</p> <p>Sanlam Investments' Policy on Environmental Sustainability, similarly requires that environmental, sustainability and governance factors be incorporated into the investment approval process. Sanlam Investments therefore assesses the risk of climate change, water shortages, land degradation, pollution and other environmental, social and governance issues as part of its decision-making process to better understand the potential for companies to deliver their cash flows into the future.</p>	
<input type="radio"/> No	
SG 1.10 CC	Indicate the documents and/or communications the organisation uses to publish TCFD disclosures.
<input type="checkbox"/> Public PRI Climate Transparency Report <input type="checkbox"/> Annual financial filings <input type="checkbox"/> Regular client reporting <input type="checkbox"/> Member communications <input type="checkbox"/> Other <input checked="" type="checkbox"/> We currently do not publish TCFD disclosures	

SG 02	Mandatory	Core Assessed	PRI 6
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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 https://www.sanlaminvestments.com/about/governance/Pages/default.aspx <input type="checkbox"/> Attachment (will be made public)	
<input checked="" type="checkbox"/> Formalised guidelines on environmental factors	
URL/Attachment	
<input checked="" type="checkbox"/> URL https://www.sanlaminvestments.com/about/governance/Pages/default.aspx <input type="checkbox"/> Attachment (will be made public)	

- Formalised guidelines on social factors

URL/Attachment
<input checked="" type="checkbox"/> URL https://www.sanlaminvestments.com/about/governance/Pages/default.aspx
<input type="checkbox"/> Attachment (will be made public)

- Formalised guidelines on corporate governance factors

URL/Attachment
<input checked="" type="checkbox"/> URL https://www.sanlaminvestments.com/about/governance/Pages/default.aspx
<input type="checkbox"/> Attachment (will be made public)

- Fiduciary (or equivalent) duties

URL/Attachment
<input checked="" type="checkbox"/> URL https://www.sanlaminvestments.com/about/governance/Pages/default.aspx
<input type="checkbox"/> Attachment (will be made public)

- Asset class-specific RI guidelines

URL/Attachment
<input checked="" type="checkbox"/> URL https://www.sanlaminvestments.com/about/governance/Pages/default.aspx
<input type="checkbox"/> Attachment (will be made public)

- Engagement policy

URL/Attachment
<input checked="" type="checkbox"/> URL https://www.sanlaminvestments.com/about/governance/Pages/default.aspx
<input type="checkbox"/> Attachment (will be made public)

- (Proxy) voting policy

URL/Attachment
<input checked="" type="checkbox"/> URL https://www.sanlaminvestments.com/about/governance/Pages/default.aspx
<input type="checkbox"/> Attachment (will be made public)

- Other, specify (1)

Other, specify (1) description
Conflict of Interest Policy

URL/Attachment
<input checked="" type="checkbox"/> URL https://www.sanlaminvestments.com/about/governance/Pages/default.aspx
<input type="checkbox"/> Attachment (will be made public)

- 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.

- Your organisation's definition of ESG and/or responsible investment and it's relation to investments

URL/Attachment
<input checked="" type="checkbox"/> URL https://www.sanlaminvestments.com/about/governance/Pages/default.aspx
<input type="checkbox"/> Attachment

- Governance structure of organisational ESG responsibilities

URL/Attachment
<input checked="" type="checkbox"/> URL https://www.sanlaminvestments.com/about/governance/Pages/default.aspx
<input type="checkbox"/> Attachment

ESG incorporation approaches

URL/Attachment	
<input checked="" type="checkbox"/> URL	https://www.sanlaminvestments.com/about/governance/Pages/default.aspx
<input type="checkbox"/> Attachment	

Active ownership approaches

URL/Attachment	
<input checked="" type="checkbox"/> URL	https://www.sanlaminvestments.com/about/governance/Pages/default.aspx
<input type="checkbox"/> Attachment	

Reporting

URL/Attachment	
<input checked="" type="checkbox"/> URL	https://www.sanlaminvestments.com/about/governance/Pages/default.aspx
<input type="checkbox"/> Attachment	

- Climate change
- Understanding and incorporating client / beneficiary sustainability preferences
- We do not publicly disclose any investment policy components

SG 02.3	Additional information [Optional].
Responsible Investment Report for 2019 is available at the URL below. https://www.sanlaminvestments.com/about/governance/Pages/default.aspx	

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

SG 03.2	Describe your policy on managing potential conflicts of interest in the investment process.
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The Sanlam Investments business has established compliance, risk-management and internal-audit functions to identify and manage potential conflicts of interest. The Sanlam Investments Conflict of Interest Management policy provides a framework to promote transparency and fairness, while other Group policies provide guidelines for ethical conduct, combating financial crime, and gratifications. Compliance monitors the Sanlam Investments insider information and personal account trading policies. Where required to prevent conflicts of interest, Sanlam Investments is structured into discrete clusters, and information flows between clusters is limited.

No

SG 04	Voluntary	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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In terms of our escalation policy, we may engage with Boards on governance issues, either alone or collaboratively, and participate in consultations regarding regulations and laws which will affect corporate governance. The aim of engaging with Boards is to better understand their point of view, and to try to persuade them to act in a way which benefits our clients, or does not prejudice them. Engagements are initiated by writing to the Board Chairperson. Sanlam Investments is represented in ensuing engagements by the Head of Equity Research and Chairman of the CGU and the analyst concerned, who will draw on Sanlam Investments' Legal and Company Secretarial resources for guidance, as required. Engagements are conducted on a confidential basis. We advise clients and will only publicise an engagement issue should that further the interest of clients.

SG 05	Mandatory	Gateway/Core Assessed	General
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SG 05.1	Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.
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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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You may reword as follows: We set and review objectives through the Corporate Governance unit which meets every 2 months. This relates to all

SG 06	Voluntary	Descriptive	General
SG 06.1 List the main responsible investment objectives that your organisation set for the reporting year.			
Responsible investment processes			
<input type="checkbox"/> Provide training on ESG incorporation <input type="checkbox"/> Provide training on ESG engagement <input checked="" type="checkbox"/> Improved communication of ESG activities within the organisation			
Key performance indicator			
Jonathan to advise			
Progress achieved			
Jonathan to advise			
<input checked="" type="checkbox"/> Improved engagement to encourage change with regards to management of ESG issues			
Key performance indicator			
Demonstrate ownership responsibilities			
Progress achieved			
Voting on 3876 (3970 in 2018) shareholder resolutions by proxy, at 231 (250) shareholder meetings; Participating in proposing shareholder resolutions regarding climate change at an investee company AGM; Opening engagements with 6 (8) companies, as well as 1 State Owned Enterprise; Responding to final proposals for new equity Listings Requirements;			
<input checked="" type="checkbox"/> Improved ESG incorporation into investment decision making processes			
Key performance indicator			
Address ESG issues in investment process			
Progress achieved			
Attended seminars and presentations on climate change, Governance, voting using block chain, and mission-aligned investing; Subscribed to receive ESG data scoring and set out to incorporate it into our investment processes in the equity and fixed interest teams.			
<input type="checkbox"/> Other, specify (1) <input type="checkbox"/> Other, specify (2) <input type="checkbox"/> Other, specify (3) <input type="checkbox"/> None of the above			
ESG characteristics of investments			
<input checked="" type="checkbox"/> Over or underweight companies based on ESG characteristics			
Key performance indicator			
ESG characteristics of investments			
Progress achieved			
We limited exposure to a poorly governed company to a maximum of benchmark weighting.			
<input type="checkbox"/> Improve ESG ratings of portfolio <input type="checkbox"/> Setting carbon reduction targets for portfolio <input type="checkbox"/> Other, specify (1) <input type="checkbox"/> Other, specify (2) <input type="checkbox"/> Other, specify (3) <input type="checkbox"/> None of the above			
Other activities			
<input checked="" type="checkbox"/> Joining and/or participation in RI initiatives			
Key performance indicator			
Participate in collaborative engagement initiatives			
Progress achieved			
Internally amongst our ultimate holding company Sanlam, Santam, Satrix as well as Sanlam Investments Africa and East Africa; Externally we collaborated with other investment managers on 3 of the 6 company engagements undertaken as the range and complexity of topics increased, including our first environmental engagement regarding climate change transparency; We joined the PRI Africa discussion group; We also attended remuneration policy discussions arranged by PwC.			

- Encouraging others to join a RI initiative
- Documentation of best practice case studies
- Using case studies to demonstrate engagement and ESG incorporation to clients
- Other, specify (1)
- Other, specify (2)

other description (2)

Transparency

Key performance indicator

Improve transparency of ESG incorporation

Progress achieved

Completed client, intermediary and PRI questionnaires to report on our Responsible Investment activities;
Continued to support a project to confirm votes cast using block chain technology.

- Other, specify (3)
- None of the above

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

Roles

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

Select from the below internal roles

- Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Other Chief-level staff or head of department, specify
- Portfolio managers
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Investment analysts
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Dedicated responsible investment staff
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Investor relations
- Other role, specify (1)
- Other role, specify (2)

- External managers or service providers

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

- The board of directors approves policies and governs activities.
- The CEO and heads of asset classes participate in oversight and implementation directly and via the Corporate Governance Unit (CGU). The CGU consists of senior investment professionals and support staff who oversee the process. Minutes are taken of meetings and made available to company management
- Portfolio managers and analysts are responsible for implementation.
- We have dedicated responsible investment staff who write policy, vote and engage.

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

2

SG 07.4	Additional information. [Optional]
---------	------------------------------------

Our ESG specialists are:

- Richard Anderson joined SIM in 2002 and commenced ESG work in 2006. Richard chairs the Corporate Governance Unit (CGU) and reports to the SIM CEO. Richard works in conjunction with the Head of Equities Research, Marlo Scholtz.

- Mlamli Roji joined Sanlam Investments in 2006 and commenced proxy voting work in 2016. Mlamli votes proxies and reports to the Chief Operating Officer of asset management.

- Jonathan de Pasquallie joined Sanlam Investments as an ESG analyst in 2020. Jonathan is responsible for ESG analysis and engagements and reports to the Chief Operating Officer of asset management.

The Corporate Governance Unit (CGU) currently has 10 members.

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

	Board members or trustees
--	---------------------------

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

	Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Risk Officer (CRO), Investment Committee
--	---

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

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

- 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

	Dedicated responsible investment staff
--	--

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

SG 08	Voluntary	Additional Assessed	General
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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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Not for senior investment staff. Staff involved in proxy voting have relevant KPI's for bonus calculation purposes.

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

- Principles for Responsible Investment

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

Moderate

- 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)

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

- 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)
- 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
- Other collaborative organisation/initiative, specify
- 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
- No

SG 11	Voluntary	Additional Assessed	PRI 4,5,6
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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.
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- 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

specify description

Dialogue with policy makers/ regulators. We provide input into legislation/ regulation should it benefit clients, either through ASISA or directly to Parliament or the JSE.

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.

- ESG in credit ratings, and Fiduciary Duty.
- Responsible Investment practices of Investment Managers; on WFE ESG guidance; on SA investors' usage of Integrated Reports, and on investment resilience from an insurance underwriting perspective.
- Made submissions on equity listing requirements to both ASISA (industry body) and the JSE (exchange), as well as on debt listing requirements to ASISA.

SG 12

Mandatory

Core Assessed

PRI 4

SG 12.1

Indicate whether your organisation uses investment consultants.

- Yes, we use investment consultants
 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.).

- 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 14

Mandatory to Report, Voluntary to Disclose

Additional Assessed

PRI 1

SG 14.1

Some investment risks and opportunities arise as a result of long term trends. Indicate which of the following are considered.

- 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 CC	Voluntary		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.

Metric Type	Coverage	Purpose	Metric Unit	Metric Methodology
Carbon footprint (scope 1 and 2)				
Portfolio carbon footprint				

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
Our risk management process is reactive rather than systematic. We scan the environment to identify upcoming risks such as el Nino effects, drought etc.

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	Descriptive	PRI 1
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SG 15.1 Indicate if your organisation allocates assets to, or manages, funds based on specific environmental and social themed areas.

- Yes
- No

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

Asset Class	Describe what processes are in place and the outputs or outcomes achieved
Property	ESG issues are addressed both in the form of ESG integration and through responsible stewardship activities. An internal process has been set in place in the form of an in-house ESG score card which is used to complement existing research processes.

SG 18	Voluntary	Descriptive	General
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SG 18.1 Indicate whether any specific features of your approach to responsible investment are particularly innovative.

- Yes
- No

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

Listed equity - Incorporation

Do you disclose?

- We do not proactively disclose it to the public and/or clients/beneficiaries
- We disclose to clients/beneficiaries only.
- We disclose it publicly

The information disclosed to clients/beneficiaries is the same

- Yes
- No

Disclosure to public and URL

Disclosure to public and URL
<input type="radio"/> Broad approach to ESG incorporation <input checked="" type="checkbox"/> Detailed explanation of ESG incorporation strategy used
Quarterly or more frequently
https://www.sanlaminvestments.com/about/governance/Pages/default.aspx

Listed equity - Engagement

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

Disclosure to public and URL	Disclosure to clients/beneficiaries
Disclosure to public and URL	Disclosure to clients/beneficiaries
<input checked="" type="checkbox"/> Details on the overall engagement strategy <input type="checkbox"/> Details on the selection of engagement cases and definition of objectives of the selections, priorities and specific goals <input checked="" type="checkbox"/> Number of engagements undertaken <input checked="" type="checkbox"/> Breakdown of engagements by type/topic <input type="checkbox"/> Breakdown of engagements by region <input type="checkbox"/> An assessment of the current status of the progress achieved and outcomes against defined objectives <input type="checkbox"/> Examples of engagement cases <input type="checkbox"/> Details on eventual escalation strategy taken after the initial dialogue has been unsuccessful (i.e. filing resolutions, issuing a statement, voting against management, divestment etc.) <input type="checkbox"/> Details on whether the provided information has been externally assured <input type="checkbox"/> Outcomes that have been achieved from the engagement <input type="checkbox"/> Other information	<input checked="" type="checkbox"/> Details on the overall engagement strategy <input checked="" type="checkbox"/> Details on the selection of engagement cases and definition of objectives of the selections, priorities and specific goals <input checked="" type="checkbox"/> Number of engagements undertaken <input checked="" type="checkbox"/> Breakdown of engagements by type/topic <input type="checkbox"/> Breakdown of engagements by region <input checked="" type="checkbox"/> An assessment of the current status of the progress achieved and outcomes against defined objectives <input checked="" type="checkbox"/> Examples of engagement cases <input type="checkbox"/> Details on eventual escalation strategy taken after the initial dialogue has been unsuccessful (i.e. filing resolutions, issuing a statement, voting against management, divestment etc.) <input type="checkbox"/> Details on whether the provided information has been externally assured <input checked="" type="checkbox"/> Outcomes that have been achieved from the engagement <input type="checkbox"/> Other information
Quarterly or more frequently	Quarterly or more frequently
https://www.sanlaminvestments.com/about/governance/Pages/default.aspx	

Listed equity – (Proxy) Voting

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

Disclosure to public and URL	Disclosure to clients/beneficiaries

Disclosure to public and URL	Disclosure to clients/beneficiaries
<input type="radio"/> Disclose all voting decisions <input type="radio"/> Disclose some voting decisions <input checked="" type="radio"/> Only disclose abstentions and votes against management	<input checked="" type="radio"/> Disclose all voting decisions <input type="radio"/> Disclose some voting decisions <input type="radio"/> Only disclose abstentions and votes against management
Quarterly or more frequently	Quarterly or more frequently
https://www.sanlaminvestments.com/about/governance/Pages/default.aspx	

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

SG Checks

Checks

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

LEI 01	Mandatory	Gateway	PRI 1
LEI 01.1	Indicate which ESG incorporation strategy and/or combination of strategies you apply to your actively managed listed equities; and the breakdown of your actively managed listed equities by strategy or combination of strategies.		
	<input type="checkbox"/> Screening alone (i.e., not combined with any other strategies) <input type="checkbox"/> Thematic alone (i.e., not combined with any other strategies) <input type="checkbox"/> Integration alone (i.e., not combined with any other strategies) <input checked="" type="checkbox"/> Screening and integration strategies		
	Percentage of active listed equity to which the strategy is applied – you may estimate +/- 5%		100%
	<input type="checkbox"/> Thematic and integration strategies <input type="checkbox"/> Screening and thematic strategies <input type="checkbox"/> All three strategies combined <input type="checkbox"/> We do not apply incorporation strategies		
LEI 01.3	If assets are managed using a combination of ESG incorporation strategies, briefly describe how these combinations are used. [Optional]		
	Integration is incorporated by analysts when building their models which factor in material ESG factors. This is complemented by a more formal process through an ESG risk score where a screening process is applied.		
LEI 02	Voluntary	Additional Assessed	PRI 1
LEI 02.1	Indicate what ESG information you use in your ESG incorporation strategies and who provides this information.		
	<input type="checkbox"/> Raw ESG company data <input checked="" type="checkbox"/> Company-related analysis or ratings <ul style="list-style-type: none"> <input checked="" type="checkbox"/> ESG research provider <input checked="" type="checkbox"/> Sell-side <input type="checkbox"/> In-house – specialised ESG analyst or team <input checked="" type="checkbox"/> In-house – analyst or portfolio manager <input checked="" type="checkbox"/> Sector-related analysis or ratings <ul style="list-style-type: none"> <input checked="" type="checkbox"/> ESG research provider <input checked="" type="checkbox"/> Sell-side <input type="checkbox"/> In-house – specialised ESG analyst or team <input type="checkbox"/> In-house – analyst or portfolio manager <input type="checkbox"/> Country-related analysis or ratings <input type="checkbox"/> Screened stock list <input type="checkbox"/> ESG issue-specific analysis or ratings <input type="checkbox"/> Other, specify		
LEI 02.2	Indicate whether you incentivise brokers to provide ESG research.		
	<input checked="" type="checkbox"/> Yes		
LEI 02.3	Describe how you incentivise brokers.		
	We started to allocate brokerage specifically for ESG research in 2017		
	<input type="checkbox"/> No		
LEI 02.4	Additional information. [Optional]		
	We started to incorporate Sustainalytics data from 2019 in both equity and fixed interest processes.		
LEI 03	Voluntary	Additional Assessed	PRI 1
LEI 03.1	Indicate whether your organisation has a process through which information derived from ESG engagement and/or (proxy) voting activities is made available for use in investment decision-making.		
	<input checked="" type="checkbox"/> Engagement <ul style="list-style-type: none"> <input checked="" type="checkbox"/> We have a systematic process to ensure the information is made available. <input type="checkbox"/> We occasionally make this information available. <input type="checkbox"/> We do not make this information available. <input checked="" type="checkbox"/> (Proxy) voting <ul style="list-style-type: none"> <input checked="" type="checkbox"/> We have a systematic process to ensure the information is made available. <input type="checkbox"/> We occasionally make this information available. <input type="checkbox"/> We do not make this information available. 		

LEI 04	Mandatory	Descriptive	PRI 1								
LEI 04.1	Indicate and describe the type of screening you apply to your internally managed active listed equities.										
<input checked="" type="checkbox"/> Negative/exclusionary screening <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Product <input type="checkbox"/> Activity <input type="checkbox"/> Sector <input type="checkbox"/> Country/geographic region <input type="checkbox"/> Environmental and social practices and performance <input type="checkbox"/> Corporate governance <table border="1" style="width: 100%;"> <thead> <tr> <th style="width: 20%;"></th> <th>Description</th> </tr> </thead> <tbody> <tr> <td></td> <td>We don't screen in our core process, but do for selected products such as the Sanlam Temperance Balanced Fund, which screens out gambling, alcohol and tobacco companies, as well as global arms manufacturers.</td> </tr> </tbody> </table> <ul style="list-style-type: none"> <input type="checkbox"/> Positive/best-in-class screening <input type="checkbox"/> Norms-based screening 					Description		We don't screen in our core process, but do for selected products such as the Sanlam Temperance Balanced Fund, which screens out gambling, alcohol and tobacco companies, as well as global arms manufacturers.				
	Description										
	We don't screen in our core process, but do for selected products such as the Sanlam Temperance Balanced Fund, which screens out gambling, alcohol and tobacco companies, as well as global arms manufacturers.										
LEI 04.2	Describe how you notify clients and/or beneficiaries when changes are made to your screening criteria.										
We don't screen in our core process, but do for selected products where mandated. Changes to screening criteria would be by client instruction.											
LEI 05	Mandatory	Core Assessed	PRI 1								
LEI 05.1	Indicate which processes your organisation uses to ensure ESG screening is based on robust analysis.										
<input type="checkbox"/> Comprehensive ESG research is undertaken or sourced to determine companies' activities and products. <input type="checkbox"/> Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies. <input type="checkbox"/> External research and data used to identify companies to be excluded/included is subject to internal audit by ESG/RI staff, the internal audit function or similar. <input type="checkbox"/> Third-party ESG ratings are updated regularly to ensure that portfolio holdings comply with fund policies. <input type="checkbox"/> Trading platforms blocking / restricting flagged securities on the black list. <input type="checkbox"/> A committee, body or similar with representatives independent of the individuals who conduct company research reviews some or all screening decisions. <input type="checkbox"/> A periodic review of internal research is carried out. <input type="checkbox"/> Review and evaluation of external research providers. <input type="checkbox"/> Other; specify <input checked="" type="checkbox"/> None of the above											
LEI 05.5	Additional information. [Optional]										
Refer to LEI 4.2											
LEI 06	Voluntary	Additional Assessed	PRI 1								
LEI 06.1	Indicate which processes your organisation uses to ensure fund criteria are not breached.										
<input type="checkbox"/> Systematic checks are performed to ensure that stocks meet the fund's screening criteria <input type="checkbox"/> Automated IT systems prevent investment managers from investing in excluded stocks or those that do not meet positive screening criteria <input type="checkbox"/> Audits of fund holdings are undertaken regularly by internal audit function <input type="checkbox"/> Periodic auditing/checking of the organisations RI funds by external party <input type="checkbox"/> Other; specify <input checked="" type="checkbox"/> None of the above											
LEI 06.2	If breaches of fund screening criteria are identified, describe the process followed to correct those breaches.										
Not applicable											
LEI 08	Mandatory	Core Assessed	PRI 1								
LEI 08.1	Indicate the proportion of actively managed listed equity portfolios where E, S and G factors are systematically researched as part of your investment analysis.										
<table border="1" style="width: 100%;"> <thead> <tr> <th style="width: 20%;">ESG issues</th> <th colspan="2">Proportion impacted by analysis</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Environmental</td> <td style="width: 30%;"></td> <td style="background-color: #0070C0; color: white;">Environmental</td> </tr> <tr> <td> <input checked="" type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input type="radio"/> >90% </td> <td></td> </tr> </tbody> </table>				ESG issues	Proportion impacted by analysis		Environmental		Environmental	<input checked="" type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input type="radio"/> >90%	
ESG issues	Proportion impacted by analysis										
Environmental		Environmental									
	<input checked="" type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input type="radio"/> >90%										

Social	<input checked="" type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input type="radio"/> >90%
Corporate Governance	<input type="radio"/> <10% <input checked="" type="radio"/> 10-50% <input type="radio"/> 51-90% <input type="radio"/> >90%

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

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

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

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

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

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

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

- ESG information is held within centralised databases or tools, and it is accessible by all relevant staff
- ESG information or analysis is a standard section or aspect of all company research notes or industry/sector analysis generated by investment staff
- Systematic records are kept that capture how ESG information and research were incorporated into investment decisions
- Other; specify
- None of the above

LEI 09.6 Additional information. [Optional]

With reference to LEI 09.1 - We review Integrated Reports thoroughly prior to voting proxies.
 With reference to LEI 09.4 - We review internal research on an ongoing basis.

LEI 10	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 1
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LEI 10.1 Indicate which aspects of investment analysis you integrate material ESG information into.

- Economic analysis
- Industry analysis

Proportion of actively managed listed equity exposed to investment analysis

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

Quality of management

Proportion of actively managed listed equity exposed to investment analysis	
<input type="radio"/>	<10%
<input type="radio"/>	10-50%
<input type="radio"/>	51-90%
<input checked="" type="radio"/>	>90%

Analysis of company strategy

Proportion of actively managed listed equity exposed to investment analysis	
<input type="radio"/>	<10%
<input type="radio"/>	10-50%
<input type="radio"/>	51-90%
<input checked="" type="radio"/>	>90%

Portfolio weighting

Proportion of actively managed listed equity exposed to investment analysis	
<input type="radio"/>	<10%
<input type="radio"/>	10-50%
<input type="radio"/>	51-90%
<input checked="" type="radio"/>	>90%

Security sensitivity and/or scenario analysis

Fair value/fundamental analysis

Proportion of actively managed listed equity exposed to investment analysis	
<input type="radio"/>	<10%
<input type="radio"/>	10-50%
<input type="radio"/>	51-90%
<input checked="" type="radio"/>	>90%

Other; specify

LEI 10.2 Indicate which methods are part of your process to integrate ESG information into fair value/fundamental analysis.

- Adjustments to forecasted company financials (sales, operating costs, earnings, cash flows)
- Adjustments to valuation-model variables (discount rates, terminal value, perpetuity growth rates)
- Valuation multiples
- Other adjustments; specify

LEI 10.3 Describe how you integrate ESG information into portfolio weighting.

We adjust weightings subjectively for Governance risks.

LEI 10.4 Describe the methods you have used to adjust the income forecast/valuation tool.

Through our bottom-up analysis of company valuations.
Note that we no longer use environmental damage costs.

LEI 11	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1
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LEI 11.1 Indicate if you manage passive listed equity funds that incorporate ESG factors in the index construction methodology.

- Yes
- No

LEI 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.

LEA 01.1	Indicate whether your organisation has an active ownership policy (includes engagement and/or voting).
----------	--

Yes

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

- Attachment provided:
- URL provided:
<https://www.sanlaminvestments.com/about/governance/Pages/default.aspx>

LEA 01.3	Indicate what your active engagement policy covers:
----------	---

	General approach to Active Ownership
--	--------------------------------------

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

	Engagement
--	------------

- ESG issues
- Prioritisation of engagement
- Methods of engagement
- Transparency of engagement activities
- Due diligence and monitoring process
- Insider information
- Escalation strategies
- Service Provider specific criteria
- Other, (specify)

(Proxy) voting approach

	Voting
--	--------

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

- Other
- None of the above

No

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

- Yes
- No

LEA 01.6	Additional information [optional]
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Where companies do not follow Sanlam Investments corporate governance policy guidelines, we have a duty to engage their Boards. This will be done by writing to a company Board representative. Sanlam Investments will be represented in ensuing engagements by the analyst concerned, Head of Equity Research and Chairman of the Corporate Governance Unit (CGU), who will draw on Sanlam Investments Legal and Company Secretarial resources for guidance, if required. Sanlam Investments recognizes that ESG issues can have a noticeable effect on the success and long-term sustainability of companies. The aim of engaging with Boards is to better understand their point of view, and to try to persuade them to act in a way which benefits our clients, or does not prejudice them. Engagements will be conducted on a confidential basis. We will only publicise an engagement issue should that further the interest of clients.

LEA 02.1	Indicate the method of engagement, giving reasons for the interaction.
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Type of engagement	Reason for interaction
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Individual / Internal staff engagements	<input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> To gain an understanding of ESG strategy and/or management <input type="checkbox"/> We do not engage via internal staff
Collaborative engagements	<input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> To gain an understanding of ESG strategy and/or management <input type="checkbox"/> We do not engage via collaborative engagements
Service provider engagements	<input type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues <input type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> To gain an understanding of ESG strategy and/or management <input checked="" type="checkbox"/> We do not engage via service providers

LEA 03	Mandatory	Core Assessed	PRI 2
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LEA 03.1 Indicate whether your organisation has a formal process for identifying and prioritising engagements.

Yes

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

Type of engagement	Criteria used to identify/prioritise engagements		
Individual / Internal staff engagements	<table border="1"> <thead> <tr> <th>Individual / Internal staff engagements</th> </tr> </thead> <tbody> <tr> <td> <input type="checkbox"/> Geography/market of the companies <input checked="" type="checkbox"/> Materiality of the ESG factors <input type="checkbox"/> Exposure (size of holdings) <input type="checkbox"/> Responses to ESG impacts that have already occurred <input type="checkbox"/> Responses to divestment pressure <input checked="" type="checkbox"/> Consultation with clients/beneficiaries <input type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) <input checked="" type="checkbox"/> Follow-up from a voting decision <input type="checkbox"/> Client request <input type="checkbox"/> Breaches of international norms <input type="checkbox"/> Other; (specify) <input type="checkbox"/> We do not outline engagement criteria for our individual engagements </td> </tr> </tbody> </table>	Individual / Internal staff engagements	<input type="checkbox"/> Geography/market of the companies <input checked="" type="checkbox"/> Materiality of the ESG factors <input type="checkbox"/> Exposure (size of holdings) <input type="checkbox"/> Responses to ESG impacts that have already occurred <input type="checkbox"/> Responses to divestment pressure <input checked="" type="checkbox"/> Consultation with clients/beneficiaries <input type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) <input checked="" type="checkbox"/> Follow-up from a voting decision <input type="checkbox"/> Client request <input type="checkbox"/> Breaches of international norms <input type="checkbox"/> Other; (specify) <input type="checkbox"/> We do not outline engagement criteria for our individual engagements
	Individual / Internal staff engagements		
<input type="checkbox"/> Geography/market of the companies <input checked="" type="checkbox"/> Materiality of the ESG factors <input type="checkbox"/> Exposure (size of holdings) <input type="checkbox"/> Responses to ESG impacts that have already occurred <input type="checkbox"/> Responses to divestment pressure <input checked="" type="checkbox"/> Consultation with clients/beneficiaries <input type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) <input checked="" type="checkbox"/> Follow-up from a voting decision <input type="checkbox"/> Client request <input type="checkbox"/> Breaches of international norms <input type="checkbox"/> Other; (specify) <input type="checkbox"/> We do not outline engagement criteria for our individual engagements			
<table border="1"> <thead> <tr> <th>Collaborative engagements</th> </tr> </thead> <tbody> <tr> <td> <input type="checkbox"/> Potential to enhance knowledge of ESG issues through other investors <input checked="" type="checkbox"/> Ability to have greater impact on ESG issues <input type="checkbox"/> Ability to add value to the collaboration <input type="checkbox"/> Geography/market of the companies targeted by the collaboration <input checked="" type="checkbox"/> Materiality of the ESG factors addressed by the collaboration <input type="checkbox"/> Exposure (size of holdings) to companies targeted by the collaboration <input type="checkbox"/> Responses to ESG impacts addressed by the collaboration that have already occurred <input type="checkbox"/> Responses to divestment pressure <input type="checkbox"/> Follow-up from a voting decision <input type="checkbox"/> Alleviate the resource burden of engagement <input type="checkbox"/> Consultation with clients/beneficiaries <input type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) <input type="checkbox"/> Other; (specify) <input type="checkbox"/> We do not outline engagement criteria for our collaborative engagement providers </td> </tr> </tbody> </table>	Collaborative engagements	<input type="checkbox"/> Potential to enhance knowledge of ESG issues through other investors <input checked="" type="checkbox"/> Ability to have greater impact on ESG issues <input type="checkbox"/> Ability to add value to the collaboration <input type="checkbox"/> Geography/market of the companies targeted by the collaboration <input checked="" type="checkbox"/> Materiality of the ESG factors addressed by the collaboration <input type="checkbox"/> Exposure (size of holdings) to companies targeted by the collaboration <input type="checkbox"/> Responses to ESG impacts addressed by the collaboration that have already occurred <input type="checkbox"/> Responses to divestment pressure <input type="checkbox"/> Follow-up from a voting decision <input type="checkbox"/> Alleviate the resource burden of engagement <input type="checkbox"/> Consultation with clients/beneficiaries <input type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) <input type="checkbox"/> Other; (specify) <input type="checkbox"/> We do not outline engagement criteria for our collaborative engagement providers	
Collaborative engagements			
<input type="checkbox"/> Potential to enhance knowledge of ESG issues through other investors <input checked="" type="checkbox"/> Ability to have greater impact on ESG issues <input type="checkbox"/> Ability to add value to the collaboration <input type="checkbox"/> Geography/market of the companies targeted by the collaboration <input checked="" type="checkbox"/> Materiality of the ESG factors addressed by the collaboration <input type="checkbox"/> Exposure (size of holdings) to companies targeted by the collaboration <input type="checkbox"/> Responses to ESG impacts addressed by the collaboration that have already occurred <input type="checkbox"/> Responses to divestment pressure <input type="checkbox"/> Follow-up from a voting decision <input type="checkbox"/> Alleviate the resource burden of engagement <input type="checkbox"/> Consultation with clients/beneficiaries <input type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) <input type="checkbox"/> Other; (specify) <input type="checkbox"/> We do not outline engagement criteria for our collaborative engagement providers			

No

LEA 03.3 Additional information. [Optional]

Where collusion, leading to the making of a mandatory offer, is not an issue, we will collaborate with other shareholder representatives in expressing our viewpoint to Boards. We prefer to do this 'after the fact', e.g. after voting proxies, to reduce the risk of being perceived as acting in concert. We may also participate in consultations regarding regulations and laws which will affect corporate governance. The appropriate forum to do this is via ASISA.

In 2019, we collaborated with other investment managers on 3 of the 6 company engagements undertaken as the range and complexity of topics increased, including our first environmental engagement regarding climate change transparency.

LEA 04	Mandatory	Core Assessed	PRI 2
LEA 04.1 Indicate whether you define specific objectives for your organisation's engagement activities.			
Individual / Internal staff engagements	<input checked="" type="radio"/> All engagement activities <input type="radio"/> Majority of engagement activities <input type="radio"/> Minority of engagement activities <input type="radio"/> We do not define specific objectives for engagement activities carried out by internal staff		
Collaborative engagements	<input checked="" type="radio"/> All engagement activities <input type="radio"/> Majority of engagement activities <input type="radio"/> Minority of engagement activities <input type="radio"/> We do not define specific objectives for engagement activities carried out through collaboration		

LEA 05	Mandatory	Core Assessed	PRI 2
LEA 05.1 Indicate whether you monitor and/or review engagement outcomes.			
Individual / Internal staff engagements	<input checked="" type="radio"/> Yes, in all cases <input type="radio"/> Yes, in a majority of cases <input type="radio"/> Yes, in a minority of cases <input type="radio"/> We do not monitor, or review engagement outcomes when the engagement is carried out by our internal staff.		
Collaborative engagements	<input checked="" type="radio"/> Yes, in all cases <input type="radio"/> Yes, in a majority of cases <input type="radio"/> Yes, in a minority of cases <input type="radio"/> We do not monitor, or review engagement outcomes when the engagement is carried out through collaboration.		

LEA 05.2 Indicate whether you do any of the following to monitor and/or review the progress of engagement activities.			
Individual / Internal staff engagements	<input type="checkbox"/> Define timelines/milestones for your objectives <input checked="" type="checkbox"/> Track and/or monitor progress against defined objectives and/or KPIs <input type="checkbox"/> Track and/or monitor the progress of action taken when original objectives are not met <input type="checkbox"/> Revisit and, if necessary, revise objectives on a continuous basis <input type="checkbox"/> Other; specify		
Collaborative engagements	<input type="checkbox"/> Define timelines/milestones for your objectives <input checked="" type="checkbox"/> Track and/or monitor progress against defined objectives and/or KPIs <input type="checkbox"/> Track and/or monitor the progress of action taken when original objectives are not met <input type="checkbox"/> Revisit and, if necessary, revise objectives on a continuous basis <input type="checkbox"/> Other; specify		

LEA 06	Mandatory	Additional Assessed	PRI 2,4
LEA 06.1 Indicate whether your organisation has an escalation strategy when engagements are unsuccessful.			
<input checked="" type="checkbox"/> Yes			
LEA 06.2 Indicate the escalation strategies used at your organisation following unsuccessful engagements.			
<input type="checkbox"/> Collaborating with other investors <input type="checkbox"/> Issuing a public statement <input type="checkbox"/> Filing/submitting a shareholder resolution <input type="checkbox"/> Voting against the re-election of the relevant directors <input type="checkbox"/> Voting against the board of directors or the annual financial report <input type="checkbox"/> Submitting nominations for election to the board <input checked="" type="checkbox"/> Seeking legal remedy / litigation <input checked="" type="checkbox"/> Reducing exposure (size of holdings) <input type="checkbox"/> Divestment <input type="checkbox"/> Other; specify			

No

LEA 07	Voluntary	Additional Assessed	PRI 1,2
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LEA 07.1 Indicate whether insights gained from your organisation's engagements are shared with investment decision-makers.

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

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

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

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

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

LEA 07.4 Additional information. [Optional]

We provide information for client-facing staff to pass on to clients.

LEA 08	Mandatory	Gateway	PRI 2
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LEA 08.1 Indicate whether you track the number of your engagement activities.

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

LEA 09	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 2
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LEA 09.1 Indicate the proportion of companies in your listed equities portfolio with which your organisation engaged during the reporting year.

	We did not complete any engagements in the reporting year.	Number of companies engaged (avoid double counting, see explanatory notes)	Proportion of companies engaged with, out of total listed equities portfolio
Individual / Internal staff engagements	<input type="checkbox"/> We did not complete any engagements in the reporting year.	6	3
Collaborative engagements	<input type="checkbox"/> We did not complete any engagements in the reporting year.	3	1

LEA 09.2 Indicate the breakdown of engagements conducted within the reporting year by the number of interactions (including interactions made on your behalf).

No. of interactions with a company	% of engagements
One interaction	<input checked="" type="checkbox"/> >76%
	<input type="checkbox"/> 51-75%
	<input type="checkbox"/> 11-50%
	<input type="checkbox"/> 1-10%
	<input type="checkbox"/> None
2 to 3 interactions	<input type="checkbox"/> >76%
	<input type="checkbox"/> 51-75%
	<input type="checkbox"/> 11-50%
	<input type="checkbox"/> 1-10%
	<input checked="" type="checkbox"/> None
More than 3 interactions	<input type="checkbox"/> >76%
	<input type="checkbox"/> 51-75%
	<input type="checkbox"/> 11-50%
	<input type="checkbox"/> 1-10%
	<input checked="" type="checkbox"/> None
Total	100%

LEA 09.3 Indicate the percentage of your collaborative engagements in which you were the leading organisation during the reporting year.

Type of engagement	% leading role
Collaborative engagements	<input type="checkbox"/> >50%
	<input type="checkbox"/> 10-50%
	<input type="checkbox"/> <10%
	<input checked="" type="checkbox"/> None

LEA 10 Voluntary Additional Assessed PRI 2

LEA 10.1 Indicate which of the following your engagement involved.

- Letters and emails to companies
 - In a minority of cases
 - In a majority of cases
 - In all cases
- Meetings and/or calls with board/senior management
 - In a minority of cases
 - In a majority of cases
 - In all cases
- Meetings and/or calls with the CSR, IR or other management
 - In a minority of cases
 - In a majority of cases
 - In all cases
- Visits to operations
- Visits to supplier(s) in supplier(s) from the company's supply chain
- Participation in roadshows
- Other

LEA 11 Voluntary Descriptive PRI 2

LEA 11.1 Provide examples of the engagements that your organisation or your service provider carried out during the reporting year.

Add Example 1

ESG Topic	<input checked="" type="checkbox"/> Climate Change
Conducted by	Collaborative

Objectives	Request that the company publish greenhouse gas emissions reduction targets consistent with the Paris Agreement
Scope and Process	<p>Together with 5 other investment managers, we proposed shareholder resolutions for the November AGM, requesting that the company publish greenhouse gas emissions reduction targets consistent with the Paris Agreement, and their links with executive pay and capital allocation, as well as report in terms of TCFD requirements from 2020. Shortly afterwards, the company published an enhanced sustainability framework, linked to the SDGs and including a greenhouse gas emission reduction roadmap. Executive pay will be linked to climate change targets.</p> <p>The company declined to publish the resolutions on grounds that their report already addressed investor climate change concerns. In response, the investor group published a media release to make the matter public. In turn, the company arranged calls with investor representatives and journalists on their climate change report, and in December a delegation of climate change staff led by the new CEO visited investment managers. We indicated that the investor group would like to engage further on the matter in 2020.</p>
Outcomes	Ongoing

Add Example 2

ESG Topic	<input checked="" type="checkbox"/> Company leadership issues
Conducted by	Collaborative
Objectives	To get the interim Chairperson to support the nomination of three non-executive Directors (NEDs) to fill two Board vacancies.
Scope and Process	<p>We collaborated with Catalyst Fund Managers in writing to the interim Chairperson to support the nomination of three non-executive Directors (NEDs) to fill two Board vacancies. We also discussed our letter with the LID. The context was that the company secretary, MD, FD and a NED had all resigned since mid-April, and the Chairperson had recently passed away. It was reported at the AGM in June that the Board had appointed an independent investigation into whistleblower allegations of fraud and corrupt conduct by management, and at month-end the company cautioned that non-binding expressions of interest (NBEIOs) were being received.</p> <p>The Chairperson was replaced internally, and four new Board appointments were made, including our three nominees. The re-constituted Board fended off an EGM request, retained the MD and FD, and advised shareholders that the NBEIOs would not be pursued. The whistleblower allegations were found to be groundless, but the Board will nevertheless consider the investigator's recommendations to improve governance and processes. The flurry of SENS announcements has since subsided.</p>
Outcomes	Company committed to change

Add Example 3

ESG Topic	<input checked="" type="checkbox"/> Human rights
Conducted by	Individual / Internal
Objectives	
Scope and Process	
Outcomes	

- Add Example 4
- Add Example 5
- Add Example 6
- Add Example 7
- Add Example 8
- Add Example 9
- Add Example 10

LEA 11.2 Additional information. [Optional]

Details of all engagements during 2018 can be provided on request.

LEA 12	Mandatory	Descriptive	PRI 2
LEA 12.1 Indicate how you typically make your (proxy) voting decisions.			
Approach			
<input checked="" type="checkbox"/> We use our own research or voting team and make voting decisions without the use of service providers.			
Based on			
<input type="radio"/> Our own voting policy <input type="radio"/> Our clients' requests or policies <input checked="" type="radio"/> Other (explain) We use our own and clients' voting policies			
<input type="radio"/> We hire service providers who make voting recommendations and/or provide research that we use to guide our voting decisions.			

- We hire service providers who make voting decisions on our behalf, except in some pre-defined scenarios where we review and make voting decisions.
- We hire service providers who make voting decisions on our behalf.

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

Voting at AGMs is done centrally. We have appointed a designated voter, with appropriate KRAs, to vote. Voting is checked once done by the Chairman of the CGU. The analyst responsible for researching the company serves as a secondary check. Voting is then checked again against policy when compiling quarterly reports. Exceptions may be made on a leniency basis for a finite period, when company secretaries are informed accordingly.

LEA 14	Voluntary	Additional Assessed	PRI 2
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LEA 14.1 Does your organisation have a securities lending programme?

Yes

LEA 14.3 Indicate how the issue of voting is addressed in your securities lending programme.

- We recall all securities for voting on all ballot items
 - We maintain some holdings, so that we can vote at any time
 - We systematically recall some securities so that we can vote on their ballot items (e.g., in line with specific criteria)
 - We recall some securities so that we can vote on their ballot items on an ad-hoc basis
 - We empower our securities-lending agent to decide when to recall securities for voting purposes
 - We do not recall our securities for voting purposes
 - Other (specify)
- No

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

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

LEA 15.3 Additional information. [Optional]

Before declining resolutions, we contact a Board representative of the company concerned, preferably by email, to record and explain our logic, and where possible, to discuss the issue further.

LEA 16	Mandatory	Core Assessed	PRI 2
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LEA 16.1 Indicate the proportion of votes where you, and/or the service provider(s) acting on your behalf, communicated the rationale to companies for abstaining or voting against management recommendations. Indicate this as a percentage out of all eligible votes.

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

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

- Yes
- No

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

We do track or collect this information

	Votes cast (to the nearest 1%)
100%	

		Specify the basis on which this percentage is calculated	
		<input checked="" type="checkbox"/> Of the total number of ballot items on which you could have issued instructions <input type="checkbox"/> Of the total number of company meetings at which you could have voted <input type="checkbox"/> Of the total value of your listed equity holdings on which you could have voted <input type="checkbox"/> We do not track or collect this information	
LEA 17.3		Additional information. [Optional]	
		If a client has its own voting instructions in their investment mandate, we follow those. We will also follow once off voting instructions from clients.	
LEA 18	Voluntary	Additional Assessed	PRI 2
LEA 18.1		Indicate whether you track the voting instructions that you or your service provider on your behalf have issued.	
		<input checked="" type="checkbox"/> Yes, we track this information	
LEA 18.2		Of the voting instructions that you and/or third parties on your behalf have issued, indicate the proportion of ballot items that were:	
		Voting instructions Breakdown as percentage of votes cast For (supporting) management recommendations 90% Against (opposing) management recommendations 10% Abstentions 0%	
		<input type="checkbox"/> No, we do not track this information	
LEA 18.3		In cases where your organisation voted against management recommendations, indicate the percentage of companies which you have engaged.	
		100	
LEA 18.4		Additional information. [Optional]	
		Before declining resolutions, we contact a Board representative of the company concerned, preferably by email, to record and explain our logic, and where possible, to discuss the issue further.	
LEA 19	Mandatory	Core Assessed	PRI 2
LEA 19.1		Indicate whether your organisation has a formal escalation strategy following unsuccessful voting.	
		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
LEA 19.2		Indicate the escalation strategies used at your organisation following abstentions and/or votes against management.	
		<input type="checkbox"/> Contacting the company's board <input checked="" type="checkbox"/> Contacting the company's senior management <input type="checkbox"/> Issuing a public statement explaining the rationale <input type="checkbox"/> Initiating individual/collaborative engagement <input type="checkbox"/> Directing service providers to engage <input type="checkbox"/> Reducing exposure (holdings) / divestment <input type="checkbox"/> Other	
LEA 19.3		Additional information. [Optional]	
		In cases of remuneration policy / implementation where dissenting meeting votes are greater than 75%, companies are required to engage with dissenting shareholders. We write to company secretaries to draw their attention to our approach to remuneration, shown on our website.	
LEA 20	Voluntary	Descriptive	PRI 2
LEA 20.1		Indicate whether your organisation, directly or through a service provider, filed or co-filed any ESG shareholder resolutions during the reporting year.	
		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
LEA 20.7		Additional information. [Optional]	
		Please refer to the Sanlam Investments Corporate Governance website for details of proxy voting activity at the link below. https://www.sanlaminvestments.com/about/governance/Pages/default.aspx	
LEA 21	Voluntary	Descriptive	PRI 2
LEA 21.2		Additional information. [Optional]	
		Please refer to the Sanlam Investments Corporate Governance website for details of proxy voting activity at the link below. https://www.sanlaminvestments.com/about/governance/Pages/default.aspx	

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

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.

SSA	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
Corporate (financial)	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
Corporate (non-financial)	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

FI 01.2 Describe your reasons for choosing a particular ESG incorporation strategy and how combinations of strategies are used.

We use an integration approach. The fixed interest team has found that while the financials of a company give an indication of current credit quality, other factors need to be taken into account in order to determine its sustainability. Governance considerations are important, and environmental and social considerations are starting to play a bigger role in our credit assessment process. We therefore incorporate ESG considerations as inputs into determining a borrower assessment rating. Both qualitative and quantitative measures are considered in our Moody's Risk Analyst tool. ESG considerations affect the qualitative measures used as inputs. By incorporating ESG scoring and using it as a risk-management tool, we believe we are in a better position to invest in issuers where current credit quality is more sustainable. Inclusion of ESG factors also highlights certain risks that are not traditionally considered. We now focus specifically on ESG related risk factors when we meet with management teams.

FI 14 Mandatory to Report, Voluntary to Disclose Core Assessed PRI 2

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.

Category	Proportion of assets
Corporate (financial)	<input type="radio"/> >50% <input checked="" type="radio"/> 26-50% <input type="radio"/> 5-25% <input type="radio"/> More than 0%, less than 5%
	<p>FI 14.2 Indicate your motivations for conducting engagement (Corporate, Financial fixed income assets)</p> <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
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%
	<p>FI 14.2 Indicate your motivations for conducting engagement (Corporate, non-financial fixed income assets)</p> <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 Additional Assessed PRI 1,2

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.)

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

FI 15.2 Indicate how your organisation prioritises engagements with issuers.

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

FI 15.3 Indicate when your organisation conducts engagements with issuers.

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

FI 15.4 Indicate what your organisation conducts engagements with issuers on.

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

	Corporate (financial)	Corporate (non-financial)
Ensuring regular cross-team meetings and presentations.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Sharing engagement data across platforms that is accessible to ESG and investment teams.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Encouraging ESG and investment teams to join engagement meetings and roadshows.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Delegating some engagement dialogue to portfolio managers/credit analysts.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Involving portfolio managers when defining an engagement programme and developing engagement decisions.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Establishing mechanisms to rebalance portfolio holdings based on levels of interaction and outcomes of engagements.	<input type="checkbox"/>	<input type="checkbox"/>
Considering active ownership as a mechanism to assess potential future investments.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other, describe	<input type="checkbox"/>	<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"/>	<input type="checkbox"/>

FI 16 Mandatory to Report, Voluntary to Disclose Additional Assessed PRI 1,2

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

FI 16.2 Please attach or provide a URL to your fixed income engagement policy document. [Optional]

<https://www.sanlaminvestments.com/about/governance/Pages/default.aspx>

No

FI 17 Mandatory to Report, Voluntary to Disclose Additional Assessed General

FI 17.1 Indicate whether your organisation measures how your incorporation of ESG analysis in fixed income has affected investment outcomes and/or performance.

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

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

Corporate (non-financial)	
	ESG issue and explanation
Some entities encountered management instability during the year, with high management turnaround and many individuals in acting capacity. Due to this uncertainty and a potential lack of governance, SIM did not participate in certain auctions.	
Integration	
	Impact on investment decision or performance
Due to uncertainty and a potential lack of governance, SIM did not participate in certain auctions.	

Example 2

SSA	
	ESG issue and explanation
Specific client mandates contain an explicit requirement to improve their "green credentials". This has prompted SIM to participate in green bonds	
Integration	
	Impact on investment decision or performance
SIM has invested in green bonds.	

Example 3

Corporate (non-financial)	
	ESG issue and explanation
An investment was declined due to the fact that, in a default scenario, perfecting SIM's security could have resulted in a difficult reputational situation for Sanlam.	
Integration	
	Impact on investment decision or performance
Declined to invest in a security due to potential reputational risk.	

Example 4

Example 5

CM1 01	Mandatory	Additional Assessed	General				
CM1 01.1	Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:						
<input type="checkbox"/> Third party assurance over selected responses from this year's PRI Transparency Report <input type="checkbox"/> Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year <input type="checkbox"/> Third party assurance or audit of the correct implementation of RI processes (that have been reported to the PRI this year) <input type="checkbox"/> Internal audit of the correct implementation of RI processes and/or accuracy of RI data (that have been reported to the PRI this year) <input checked="" type="checkbox"/> Internal verification of responses before submission to the PRI (e.g. by the CEO or the board) <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Whole PRI Transparency Report has been internally verified <input type="checkbox"/> Selected data has been internally verified <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above							
CM1 02	Mandatory	Descriptive	General				
CM1 02.1	We undertook third party assurance on last year's PRI Transparency Report						
<input type="radio"/> Whole PRI Transparency Report was assured last year <input type="radio"/> Selected data was assured in last year's PRI Transparency Report <input checked="" type="radio"/> We did not assure last year's PRI Transparency report <input type="radio"/> None of the above, we were in our preparation year and did not report last year.							
CM1 03	Mandatory	Descriptive	General				
CM1 03.1	We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:						
<input type="checkbox"/> We adhere to an RI certification or labelling scheme <input type="checkbox"/> We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report <input type="checkbox"/> ESG audit of holdings <input checked="" type="checkbox"/> Other, specify <p style="margin-left: 20px;">Where we provide information to listed parent Sanlam's Integrated Report, processes to source information may be subject to scrutiny by auditors</p> <input type="checkbox"/> None of the above							
CM1 04	Mandatory	Descriptive	General				
CM1 04.1	Do you plan to conduct third party assurance of this year's PRI Transparency report?						
<input type="radio"/> Whole PRI Transparency Report will be assured <input type="radio"/> Selected data will be assured <input checked="" type="radio"/> We do not plan to assure this year's PRI Transparency report							
CM1 07	Mandatory	Descriptive	General				
CM1 07.1	Indicate who has reviewed/verified internally the whole - or selected data of the - PRI Transparency Report . and if this applies to selected data please specify what data was reviewed						
<input checked="" type="checkbox"/> CEO or other Chief-Level staff <table border="1" style="margin-left: 20px;"> <tr> <td colspan="2">Sign-off or review of responses</td> </tr> <tr> <td><input checked="" type="checkbox"/> Sign-off</td> <td><input type="checkbox"/> Review of responses</td> </tr> </table> <input type="checkbox"/> The Board <input type="checkbox"/> Investment Committee <input type="checkbox"/> Compliance Function <input checked="" type="checkbox"/> RI/ESG Team <input type="checkbox"/> Investment Teams <input type="checkbox"/> Legal Department <input type="checkbox"/> Other (specify)				Sign-off or review of responses		<input checked="" type="checkbox"/> Sign-off	<input type="checkbox"/> Review of responses
Sign-off or review of responses							
<input checked="" type="checkbox"/> Sign-off	<input type="checkbox"/> Review of responses						