PRINCIPLES FOR RESPONSIBLE INVESTMENT

PUBLIC TRANSPARENCY REPORT

2025

AFP INTEGRA

Generated 24-11-2025

About this report

PRI reporting is the largest global reporting project on responsible investment.

It was developed with investors, for investors. PRI signatories are required to report publicly on their responsible investment activities each year. In turn, they receive a number of outputs, including a public and private Transparency Report.

The public Transparency Reports, which are produced using signatories' reported information, provide accountability and support signatories to have internal discussions about their practices and to discuss these with their clients, beneficiaries, and other stakeholders. This public Transparency Report is an export of the signatory's responses to the PRI Reporting Framework during the 2025 reporting period. It includes the signatory's responses to core indicators, as well as responses to plus indicators that the signatory has agreed to make public.

In response to signatory feedback, the PRI has not summarised signatories' responses – the information in this document is presented exactly as it was reported.

For each of the indicators in this document, all options selected by the signatory are presented, including links and qualitative responses. In some indicators, all applicable options are included for additional context.

Disclaimers

Legal Context

PRI recognises that the laws and regulations to which signatories are subject differ by jurisdiction. We do not seek or require any signatory to take an action that is not in compliance with applicable laws. All signatory responses should therefore be understood to be subject to and informed by the legal and regulatory context in which the signatory operates.

Responsible investment definitions

Within the PRI Reporting Framework Glossary, we provide definitions for key terms to guide reporting on responsible investment practices in the Reporting Framework. These definitions may differ from those used or proposed by other authorities and regulatory bodies due to evolving industry perspectives and changing legislative landscapes. Users of this report should be aware of these variations, as they may impact interpretations of the information provided.

Data accuracy

This document presents information reported directly by signatories in the 2025 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented.

The PRI has taken reasonable action to ensure that data submitted by signatories in the reporting tool is reflected in their official PRI reports accurately. However, it is possible that small data inaccuracies and/or gaps remain, and the PRI shall not be responsible or liable for such inaccuracies and gaps.

Table of Contents

SENIOR LEADERSHIP STATEMENT (SLS)

SENIOR LEADERSHIP STATEMENT

SENIOR LEADERSHIP STATEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1	CORE	N/A	N/A	PUBLIC	Senior Leadership Statement	GENERAL

Section 1. Our commitment

■ Why does your organisation engage in responsible investment?
■ What is your organisation's overall approach to responsible investment, and what major responsible investment commitment(s) have you made?

As an institutional investor, we manage investment portfolios on behalf of our clients, upholding a fiduciary duty to maximize risk-adjusted returns while adhering to the highest standards of excellence and industry best practices. We approach sustainable investment with a comprehensive, long-term perspective, firmly believing that the financial performance, business development, and value creation of the entities in which we invest can be influenced—both positively and negatively—by Environmental, Social, and Corporate Governance (ESG) factors. We integrate ESG considerations into our investment process to fulfill our fiduciary duty, addressing potential opportunities and risks arising from the effective or deficient management of these factors by investee entities. This approach is formalized in our Sustainable Investment Policy, which outlines specific guidelines and commitments, including: 1.The integration of ESG factors into our investment processes, including the assessment of specific material ESG issues; 2.The exclusion and screening of assets with heightened exposure to ESG risks; 3.

Guidelines for impact or thematic investments with an ESG focus; and 4.The implementation of active ownership and engagement practices. To ensure the resilience of our portfolios and alignment with our clients' best interests, we subject our direct investments to an internal ESG assessment, validated by data from reputable ESG providers such as MSCI. This rigorous process includes a comprehensive evaluation of the issuer, verification of ESG integration within the issuer's business strategy, the use of monitoring questionnaires, and diligent scrutiny of controversies and alerts. Furthermore, as part of our commitment to sustainable investment, we are proud signatories of the Principles for Responsible Investment (PRI) and remain actively engaged in the local ESG ecosystem. Our dedication is reflected in our ongoing efforts to enhance and expand ESG analysis across all asset classes, including externally managed funds, which often present greater information challenges.

Our commitment also extends to the monitoring of local traditional funds. We incorporate ESG considerations into mutual fund evaluations by analyzing MSCI scores relative to peers, assessing exposure to ESG leaders and laggards, evaluating controversies, and considering carbon metrics. These investments are aligned with our internal ESG policy, which includes exclusions and restrictions related to controversial sectors and the UN Global Compact Principles. Additionally, we apply robust due diligence to alternative fund investments, using quantitative scorecards tailored to each fund's strategy to evaluate ESG variables in the decision-making process. Our firm conviction in fostering a sustainable investment environment drives us to improve ESG outcomes not only within our portfolio companies but also across the broader Peruvian market.

To this end, we actively participate in working groups established by the Responsible Investment Program (PIR), a local investor association founded by Integra and other key market participants. This association aims to develop standards and promote initiatives in coordination with local regulators to strengthen ESG practices among Peruvian companies. Finally, as part of our commitment to transparency, we published our 2024 Sustainable Investing Report—part of our 2024 Annual Report—which includes a Climate Management Report aligned with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). This report outlines our governance structure, strategy, risk management approach, and the metrics and targets used to manage climate-related risks and opportunities. The 2024 Sustainable Investing Report also includes a Sustainability Factors Report, which details our portfolio's performance across a set of ESG metrics, including its carbon footprint.

Section 2. Annual overview

■ Discuss your organisation’s progress during the reporting year on the responsible investment issue you consider most relevant or material to your organisation or its assets.
■ Reflect on your performance with respect to your organisation’s responsible investment objectives and targets during the reporting year. Details might include, for example, outlining your single most important achievement or describing your general progress on topics such as the following (where applicable):
• refinement of ESG analysis and incorporation
• stewardship activities with investees and/or with policymakers
• collaborative engagements
• attainment of responsible investment certifications and/or awards

Stewardship We maintained a strong presence in stewardship activities by actively collaborating with investor associations, advocacy groups, and policymakers. We continued our participation in PIR working groups focused on developing materiality questionnaires tailored to specific industries. In 2024, we finalized the questionnaire for the financial sector and are now exploring partnerships with local regulators to incorporate these tools into public disclosure requirements for listed companies. Previously, we co-led a PIR working group dedicated to implementing the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). This initiative provided us with technical support and training to establish our Climate Management (TCFD) reporting framework.
As a result, we published our 2024 Sustainable Investing Report, which includes our 2024 Climate Management Report (our second Climate – TCFD Report). This report outlines our governance structure, strategy, risk management practices, and the metrics and targets we use to address climate-related risks and opportunities. Additionally, in 2024, we published our first Voting Policy following a comprehensive review of our historical voting practices. This policy sets out our ESG-related voting principles for shareholder meetings of companies within our investment portfolio. ESG Integration and Climate Risk Management We continued to strengthen our ESG integration by enhancing data collection through internal surveys and third-party providers. By the end of 2024, 65% of our portfolio was covered by MSCI ESG data, with alternative assets remaining the primary asset class lacking standardized, publicly available ESG data.
We also achieved 99% carbon footprint coverage using a combination of MSCI data and a proprietary proxy methodology for companies that do not disclose emissions data. This information supports our investment decision-making, ESG performance monitoring, and peer benchmarking. On the Climate Management front, a key milestone in 2024 was the development of an in-house physical climate risk assessment for our domestic portfolio—believed to be the first publicly disclosed by a Peruvian institutional investor. This assessment, featured in our 2024 Sustainable Investing Report, uses an in-house methodology that maps the geographic locations our local portfolio companies’ assets in Peru against historical data on three major climate hazards: heavy rainfall, droughts, and sea level rise. This innovative, data-driven approach sets a new benchmark for climate risk analysis in Peru.
The methodology is designed to be both scalable and replicable, and we are currently working with government agencies to access more granular and forward-looking climate data to further enhance it. We also introduced a climate opportunity assessment for our local portfolio companies, included in the same report. This analysis identifies factors that, if effectively addressed by companies, could lead to increased revenues or reduced long-term costs. We are refining this tool throughout 2025 with feedback from portfolio companies. Engagement We continued to lead sustainability efforts in Peru through active engagement. In 2024, we successfully advocated for the inclusion of ESG-related topics in the Annual Shareholders’ Meetings of our local portfolio companies, which include 16 firms with a combined AUM of USD 1.3 billion.
Topics addressed included sustainability strategies, diversity and inclusion, and alignment with climate reporting frameworks such as the TCFD. All 16 companies adopted our proposals, and 11—representing USD 1.2 billion in AUM—have already published TCFD-aligned reports. This achievement reflects the results of four years of sustained engagement. Recognition and Regional Commitment Our commitment to sustainable development in Latin America has been recognized by ALAS20, the Sustainable Leaders Agenda. Integra has previously been named a “Leading Institution in Responsible Investment” in Peru and has received multiple awards in the “Investor ALAS20” category, along with top honors in “Responsible Investment” and “Sustainability Research.” These recognitions underscore our ongoing dedication to responsible investing and our broader mission to contribute positively to global sustainability.

Section 3. Next steps

■ What specific steps has your organisation outlined to advance your commitment to responsible investment in the next two years?

We are firmly committed to advancing sustainable investing in the coming years through the following strategic approaches: 1.Climate-Related Risks and Opportunities: We will continue to refine and enhance our climate-related methodologies to produce more accurate estimations of the financial impact of climate risks and opportunities on our portfolio, and to engage with companies to promote necessary adjustments where applicable. 2.ESG Coverage: While we acknowledge the data challenges—particularly in relation to mutual funds and alternative assets—our objective remains to achieve 100% ESG coverage across our entire portfolio. 3.Engagement: We are currently developing a new engagement methodology designed to guide our interactions with companies. This framework will define the criteria for selecting companies for engagement and outline the overall process, including internal approval procedures, key performance metrics, and strategic objectives.

4.Sustainable Investment Ecosystem: We strongly believe in the material impact of ESG factors on financial performance. Accordingly, we will continue to actively engage with investor associations, policymakers, and industry stakeholders to promote the broader adoption of sustainable practices within the corporate sector. By implementing these measures, we are confident that we will not only reinforce our commitment to responsible investment but also contribute meaningfully to a more sustainable and resilient future for our clients and the global community.

Section 4. Endorsement
'The Senior Leadership Statement has been prepared and/or reviewed by the undersigned and reflects our organisation-wide commitment and approach to responsible investment'.

Name

Aldo Ferrini

Position

CEO

Organisation’s Name

AFP INTEGRA

◉ **A**
'This endorsement applies only to the Senior Leadership Statement and should not be considered an endorsement of the information reported by the above-mentioned organisation in the various modules of the Reporting Framework. The Senior Leadership Statement serves as a general overview of the above-mentioned organisation's responsible investment approach. The Senior Leadership Statement does not constitute advice and should not be relied upon as such. Further, it is not a substitute for the skill, judgement and experience of any third parties, their management, employees, advisors and/or clients when making investment and other business decisions'.
○ B

OTHER RESPONSIBLE INVESTMENT REPORTING OBLIGATIONS (ORO)

OTHER RESPONSIBLE INVESTMENT REPORTING OBLIGATIONS

OTHER RESPONSIBLE INVESTMENT REPORTING OBLIGATIONS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ORO 1	CORE	N/A	N/A	PUBLIC	Other Responsible Investment Reporting Obligations	6

During the reporting year, to which international or regional ESG-related legislation(s) and/or regulation(s) did your organisation report?

☐ (A) Corporate Sustainability Reporting Directive (CSRD) [European Union]
☐ (B) Directive on AIFM (2011/61/EU) [European Union]
☐ (C) Enhancing climate-related disclosures by asset managers, life insurers and FCA-regulated pension providers (PS21/24) [United Kingdom]
☐ (D) EU Taxonomy Regulation [European Union]
☐ (E) Improving shareholder engagement and increasing transparency around stewardship (PS19/13) [United Kingdom]
☐ (F) IORP II (Directive 2016/2341) [European Union]
☐ (G) Law on Energy and Climate (Article 29) [France]
☐ (H) MiFID II (2017/565) [European Union]
☐ (I) Modern Slavery Act [United Kingdom]
☐ (J) PEPP Regulation (2019/1238) [European Union]
☐ (K) PRIIPS Regulation (2016/2340 and 2014/286) [European Union]
☐ (L) Regulation on the Integration of Sustainability Risks in the Governance of Insurance and Reinsurance Undertakings (2021/1256) [European Union]
☐ (M) SFDR Regulation (2019/2088) [European Union]
☐ (N) SRD II (Directive 2017/828) [European Union]
☐ (O) The Occupational Pension Schemes Regulation on Climate Change Governance and Reporting [United Kingdom]
☐ (P) Climate Risk Management (Guideline B-15) [Canada]
☐ (Q) Continuous Disclosure Obligations (National Instrument 51-102) [Canada]
☐ (R) Disposiciones de Carácter General Aplicables a los Fondos de Inversión y a las Personas que les Prestan Servicios (SIEFORE) [Mexico]
☐ (S) Instrucciones para la Integración de Dactores ASG en Los Mecanismos de Revelación de Información para FIC (External Circular 005, updated) [Colombia]
☐ (T) Provides for the creation, operation, and disclosure of information of investment funds, as well as the provision of services for the funds, and revokes the regulations that specifies (CVM Resolution No. 175) [Brazil]
☐ (U) SEC Expansion of the Names Rule [United States of America]
☐ (V) SEC Pay Ratio Disclosure Rule [United States of America]
☐ (W) ASIC RG65 Section 1013DA Disclosure Guidelines [Australia]
☐ (X) Circular to Licensed Corporations: Management and Disclosure of Climate-related Risks by Fund Managers [Hong Kong SAR]
☐ (Y) Financial Investment Services and Capital Markets Act (FSCMA) [Republic of Korea]
☐ (Z) Financial Instruments and Exchange Act (FIEA) [Japan]
☐ (AA) Financial Markets Conduct Act [New Zealand]
☐ (AB) Guiding Opinions on Regulating the Asset Management Business of Financial Institutions [China]
☐ (AC) Guidelines on Environmental Risk Management for Asset Managers [Singapore]
☐ (AD) Guidelines on Sustainable and Responsible Investment Funds [Malaysia]
☐ (AE) Modern Slavery Act (2018) [Australia]

☐ (AF) Stewardship Code for all Mutual Funds and All Categories of AIFs [India]
☐ (AG) ADGM Sustainable Finance Regulatory Framework [United Arab Emirates]
☐ (AH) JSE Limited Listings Requirements [South Africa]
☐ (AI) Other
☐ (AJ) Other
☐ (AK) Other
☐ (AL) Other
☐ (AM) Other
◉ **(AN) Not applicable; our organisation did not report to any ESG-related legislation and/or regulation during the reporting year.**
Provide context:

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ORO 2	CORE	N/A	N/A	PUBLIC	Other Responsible Investment Reporting Obligations	6

During the reporting year, to which voluntary responsible investment/ESG frameworks did your organisation report?

☐ (A) Asset Owners Stewardship Code [Australia]
☐ (B) Código Brasileiro de Stewardship [Brazil]
☐ (C) New Zealand Stewardship Code
☐ (D) Principles for Responsible Institutional Investors (Stewardship Code) [Japan]
☐ (E) Stewardship Code [United Kingdom]
☐ (F) Stewardship Framework for Institutional Investors [United States of America]
☐ (G) CFA Institute ESG Disclosure Standards for Investment Products [Global]
☐ (H) Guidelines on Funds' Names using ESG or Sustainability-related Terms [European Union]
☐ (I) Luxflag ESG Label [Luxembourg]
☐ (J) RIAA Responsible Investment Certification Program [Australia]
☐ (K) SRI Label [France]
☐ (L) ANBIMA Code of Regulation and Best Practices of Investment Funds [Brazil]
☐ (M) Code for Institutional Investors 2022 [Malaysia]
☐ (N) Code for Responsible Investing in South Africa (CRISA 2) [South Africa]
☐ (O) Corporate Governance Guidelines [Canada]
☐ (P) Defined Contribution Code of Practice [United Kingdom]
☐ (Q) European Association for Investors in Non-Listed Real Estate Vehicles (INREV) Guidelines [Global]
☐ (R) Global ESG Benchmark for Real Assets (GRESB) [Global]
☐ (S) Global Impact Investing Network (GIIN) Impact Reporting and Investment Standards (IRIS+) [Global]
☐ (T) OECD Guidelines for MNES - Responsible Business Conduct for Institutional Investors [Global]
☐ (U) UN Guiding Principles (UNGP) on Business and Human Rights [Global]
☐ (V) Net Zero Asset Managers (NZAM) Initiative [Global]
☐ (W) Net-Zero Asset Owner Alliance (NZAOA) [Global]
☑ **(X) Recommendations of the Taskforce for Climate-related Financial Disclosure (TCFD) [Global]**
☐ (Y) The Net Zero Investment Framework (NZIF) 2.0 [Global]
☐ (Z) Recommendations of the Taskforce for Nature-related Financial Disclosure (TNFD) [Global]
☐ (AA) Global Reporting Initiative (GRI) Standards [Global]
☐ (AB) IFC Performance Standard [Global]
☐ (AC) International Sustainability Standards Board (ISSB) Standards [Global]
☐ (AD) Sustainability Accounting Standards Board (SASB) Standards [Global]
☐ (AE) Other
☐ (AF) Other
☐ (AG) Other
☐ (AH) Other
☐ (AI) Other
○ (AJ) Not applicable; our organisation did not report to any voluntary responsible investment/ESG frameworks during the reporting year.

ORGANISATIONAL OVERVIEW (OO)

ORGANISATIONAL INFORMATION

REPORTING YEAR

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 1	CORE	N/A	N/A	PUBLIC	Reporting year	GENERAL

What is the year-end date of the 12-month period you have chosen to report for PRI reporting purposes?

	Date	Month	Year
Year-end date of the 12-month period for PRI reporting purposes:	31	01	2025

SUBSIDIARY INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2	CORE	N/A	OO 2.1	PUBLIC	Subsidiary information	GENERAL

Does your organisation have subsidiaries?

- ○ (A) Yes
- ◉ **(B) No**

ASSETS UNDER MANAGEMENT

ALL ASSET CLASSES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 4	CORE	OO 3	N/A	PUBLIC	All asset classes	GENERAL

What are your total assets under management (AUM) at the end of the reporting year, as indicated in [OO 1]?

	USD
(A) AUM of your organisation, including subsidiaries not part of row (B), and excluding the AUM subject to execution, advisory, custody, or research advisory only	US$ 10,231,343,169.00
(B) AUM of subsidiaries that are PRI signatories in their own right and excluded from this submission, as indicated in [OO 2.2]	US$ 0.00
(C) AUM subject to execution, advisory, custody, or research advisory only	US$ 0.00

ASSET BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5	CORE	OO 3	Multiple indicators	PUBLIC	Asset breakdown	GENERAL

Provide a percentage breakdown of your total AUM at the end of the reporting year as indicated in [OO 1].

	(1) Percentage of Internally managed AUM	(2) Percentage of Externally managed AUM
(A) Listed equity	>10-50%	>10-50%
(B) Fixed income	>10-50%	>0-10%
(C) Private equity	0%	>10-50%
(D) Real estate	0%	>0-10%
(E) Infrastructure	0%	>0-10%
(F) Hedge funds	0%	0%
(G) Forestry	0%	0%
(H) Farmland	0%	0%
(I) Other	>0-10%	0%
(J) Off-balance sheet	0%	0%

(I) Other - (1) Percentage of Internally managed AUM - Specify:

Cash, Money Market Instruments and Derivatives

ASSET BREAKDOWN: EXTERNALLY MANAGED ASSETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.1	CORE	OO 5	Multiple	PUBLIC	Asset breakdown: Externally managed assets	GENERAL

Provide a further breakdown of your organisation's externally managed listed equity and/or fixed income AUM.

	(1) Listed equity	(2) Fixed income - SSA	(3) Fixed income - corporate	(4) Fixed income - securitised	(5) Fixed income - private debt
(A) Active	>10-50%	>0-10%	>10-50%	0%	>10-50%
(B) Passive	>75%	>10-50%	>10-50%		

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.2	CORE	OO 5, OO 5.1	SAM 3, SAM 8	PUBLIC	Asset breakdown: Externally managed assets	GENERAL

Provide a breakdown of your organisation's externally managed AUM between segregated mandates and pooled funds or investments.

	(1) Segregated mandate(s)	(2) Pooled fund(s) or pooled investment(s)
(A) Listed equity - active	0%	>75%
(B) Listed equity - passive	0%	>75%
(C) Fixed income - active	0%	>75%
(D) Fixed income - passive	0%	>75%
(E) Private equity	0%	>75%
(F) Real estate	0%	>75%
(G) Infrastructure	0%	>75%

ASSET BREAKDOWN: INTERNALLY MANAGED LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 LE	CORE	OO 5	Multiple	PUBLIC	Asset breakdown: Internally managed listed equity	GENERAL

Provide a further breakdown of your internally managed listed equity AUM.

(A) Passive equity	0%
(B) Active – quantitative	0%
(C) Active – fundamental	>75%
(D) Other strategies	0%

ASSET BREAKDOWN: INTERNALLY MANAGED FIXED INCOME

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 FI	CORE	OO 5	Multiple	PUBLIC	Asset breakdown: Internally managed fixed income	GENERAL

Provide a further breakdown of your internally managed fixed income AUM.

(A) Passive – SSA	0%
(B) Passive – corporate	0%
(C) Active – SSA	>50-75%
(D) Active – corporate	>10-50%
(E) Securitised	>0-10%
(F) Private debt	0%

MANAGEMENT BY PRI SIGNATORIES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 6	CORE	OO 5	N/A	PUBLIC	Management by PRI signatories	GENERAL

What percentage of your organisation's externally managed assets are managed by PRI signatories?

>75%

GEOGRAPHICAL BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 7	CORE	Multiple, see guidance	N/A	PUBLIC	Geographical breakdown	GENERAL

How much of your AUM in each asset class is invested in emerging markets and developing economies?

	AUM in Emerging Markets and Developing Economies
(A) Listed equity	(7) >50 to 60%
(B) Fixed income – SSA	(11) >90 to <100%
(C) Fixed income – corporate	(9) >70 to 80%
(D) Fixed income – securitised	(12) 100%
(E) Fixed income – private debt	(4) >20 to 30%
(F) Private equity	(2) >0 to 10%
(G) Real estate	(6) >40 to 50%
(H) Infrastructure	(6) >40 to 50%

STEWARDSHIP

STEWARDSHIP

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 8	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship	GENERAL

Does your organisation conduct stewardship activities, excluding (proxy) voting, for any of your assets?

	(1) Listed equity - active	(2) Listed equity - passive	(3) Fixed income - active	(4) Fixed income - passive
(A) Yes, through internal staff	☑	☐	☑	☐
(B) Yes, through service providers	☐	☐	☐	☐
(C) Yes, through external managers	☑	☑	☑	☑
(D) We do not conduct stewardship	○	○	○	○
	(5) Private equity	**(6) Real estate**	**(7) Infrastructure**	**(11) Other**
(A) Yes, through internal staff	☐	☐	☐	☑
(B) Yes, through service providers	☐	☐	☐	☐
(C) Yes, through external managers	☑	☑	☑	☐
(D) We do not conduct stewardship	○	○	○	○

STEWARDSHIP: (PROXY) VOTING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship: (Proxy) voting	GENERAL

Does your organisation conduct (proxy) voting activities for any of your listed equity holdings?

	(1) Listed equity - active	(2) Listed equity - passive
(A) Yes, through internal staff	☑	☐
(B) Yes, through service providers	☐	☐
(C) Yes, through external managers	☑	☑
(D) We do not conduct (proxy) voting	○	○

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9.1	CORE	OO 9	PGS 10.1, PGS 31	PUBLIC	Stewardship: (Proxy) voting	GENERAL

For each asset class, on what percentage of your listed equity holdings do you have the discretion to vote?

	Percentage of your listed equity holdings over which you have the discretion to vote
(A) Listed equity – active	(12) 100%
(B) Listed equity - passive	(12) 100%

ESG INCORPORATION

INTERNALLY MANAGED ASSETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 11	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Internally managed assets	1

For each internally managed asset class, does your organisation incorporate ESG factors, to some extent, into your investment decisions?

	(1) Yes, we incorporate ESG factors into our investment decisions	(2) No, we do not incorporate ESG factors into our investment decisions
(C) Listed equity - active - fundamental	◉	○
(E) Fixed income - SSA	◉	○
(F) Fixed income - corporate	◉	○
(G) Fixed income - securitised	◉	○
(V) Other: Cash, Money Market Instruments and Derivatives	○	◉

EXTERNAL MANAGER SELECTION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 12	CORE	OO 5, OO 5.1	Multiple indicators	PUBLIC	External manager selection	1

For each externally managed asset class, does your organisation incorporate ESG factors, to some extent, when selecting external investment managers?

	(1) Yes, we incorporate ESG factors when selecting external investment managers	(2) No, we do not incorporate ESG factors when selecting external investment managers
(A) Listed equity - active	◉	○
(B) Listed equity - passive	◉	○
(C) Fixed income - active	◉	○
(D) Fixed income - passive	◉	○
(E) Private equity	◉	○
(F) Real estate	◉	○
(G) Infrastructure	◉	○

EXTERNAL MANAGER APPOINTMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 13	CORE	OO 5, OO 5.1	Multiple indicators	PUBLIC	External manager appointment	1

For each externally managed asset class, does your organisation incorporate ESG factors, to some extent, when appointing external investment managers?

	(1) Yes, we incorporate ESG factors when appointing external investment managers	(2) No, we do not incorporate ESG factors when appointing external investment managers
(A) Listed equity - active	◉	○
(B) Listed equity - passive	◉	○
(C) Fixed income - active	◉	○
(D) Fixed income - passive	◉	○
(E) Private equity	◉	○
(F) Real estate	◉	○
(G) Infrastructure	◉	○

EXTERNAL MANAGER MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 14	CORE	OO 5, OO 5.1	Multiple indicators	PUBLIC	External manager monitoring	1

For each externally managed asset class, does your organisation incorporate ESG factors, to some extent, when monitoring external investment managers?

	(1) Yes, we incorporate ESG factors when monitoring external investment managers	(2) No, we do not incorporate ESG factors when monitoring external investment managers
(A) Listed equity - active	◉	○
(B) Listed equity - passive	◉	○
(C) Fixed income - active	◉	○
(D) Fixed income - passive	◉	○
(E) Private equity	◉	○
(F) Real estate	◉	○
(G) Infrastructure	◉	○

ESG NOT INCORPORATED

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 16	CORE	OO 11, OO 12–14	N/A	PUBLIC	ESG not incorporated	1

Describe why your organisation does not currently incorporate ESG factors into your investment decisions and/or in the selection, appointment and/or monitoring of external investment managers.

Internally managed
(O) Other

ESG factors are not incorporated in the investment decisions for Cash and Derivatives.

ESG STRATEGIES

LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17 LE	CORE	OO 11	OO 17.1 LE, LE 12	PUBLIC	Listed equity	1

Which ESG incorporation approach and/or combination of approaches does your organisation apply to your internally managed active listed equity?

	Percentage out of total internally managed active listed equity
(A) Screening alone	0%
(B) Thematic alone	0%
(C) Integration alone	0%
(D) Screening and integration	0%
(E) Thematic and integration	0%
(F) Screening and thematic	0%
(G) All three approaches combined	>75%
(H) None	0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17.1 LE	CORE	OO 17 LE	LE 9	PUBLIC	Listed equity	1

What type of screening does your organisation use for your internally managed active listed equity assets where a screening approach is applied?

	Percentage coverage out of your total listed equity assets where a screening approach is applied
(A) Positive/best-in-class screening only	0%
(B) Negative screening only	0%
(C) A combination of screening approaches	>75%

FIXED INCOME

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17 FI	CORE	OO 5.3 FI, OO 11	Multiple, see guidance	PUBLIC	Fixed income	1

Which ESG incorporation approach and/or combination of approaches does your organisation apply to your internally managed active fixed income?

	(1) Fixed income - SSA	(2) Fixed income - corporate	(3) Fixed income - securitised
(A) Screening alone	0%	0%	0%
(B) Thematic alone	0%	0%	0%
(C) Integration alone	0%	0%	0%
(D) Screening and integration	0%	0%	0%
(E) Thematic and integration	0%	0%	0%
(F) Screening and thematic	0%	0%	0%

(G) All three approaches combined	>75%	>75%	>75%
(H) None	0%	0%	0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17.1 FI	CORE	OO 17 FI	N/A	PUBLIC	Fixed income	1

What type of screening does your organisation use for your internally managed active fixed income where a screening approach is applied?

	(1) Fixed income - SSA	(2) Fixed income - corporate	(3) Fixed income - securitised
(A) Positive/best-in-class screening only	0%	0%	0%
(B) Negative screening only	0%	0%	0%
(C) A combination of screening approaches	>75%	>75%	>75%

ESG/SUSTAINABILITY FUNDS AND PRODUCTS

LABELLING AND MARKETING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18	CORE	OO 11–14	OO 18.1	PUBLIC	Labelling and marketing	1

Do you explicitly market any of your products and/or funds as ESG and/or sustainable?

○ (A) Yes, we market products and/or funds as ESG and/or sustainable
○ (B) No, we do not offer products or funds explicitly marketed as ESG and/or sustainable
◉ **(C) Not applicable; we do not offer products or funds**

Additional context to your response(s): (Voluntary)

AFP Integra is a private pension fund manager based in Peru. In accordance with Peruvian regulations, we are only permitted to offer four types of pension funds. Each fund has its own defined characteristics, and current laws do not allow us to include ESG or sustainability labels in any of them.

THEMATIC BONDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 20	CORE	OO 17 FI	FI 15, FI 17	PUBLIC	Thematic bonds	1

What percentage of your total environmental and/or social thematic bonds are labelled by the issuers in accordance with industry-recognised standards?

	Percentage of your total environmental and/or social thematic bonds labelled by the issuers
(A) Green or climate bonds	0%
(B) Social bonds	>0-10%
(C) Sustainability bonds	>75%
(D) Sustainability-linked bonds	0%
(E) SDG or SDG-linked bonds	0%
(F) Other	0%
(G) Bonds not labelled by the issuer	0%

SUMMARY OF REPORTING REQUIREMENTS

SUMMARY OF REPORTING REQUIREMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 21	CORE	Multiple indicators	Multiple indicators	PUBLIC	Summary of reporting requirements	GENERAL

The following table shows which modules are mandatory or voluntary to report on in the separate PRI asset class modules. Where a module is voluntary, indicate if you wish to report on it.

Applicable modules	(1) Mandatory to report (pre-filled based on previous responses)	(2.1) Voluntary to report. Yes, I want to opt-in to reporting on the module	(2.2) Voluntary to report. No, I want to opt-out of reporting on the module
Policy, Governance and Strategy	◉	○	○
Confidence Building Measures	◉	○	○
(T) External manager selection, appointment and monitoring (SAM) – listed equity - active	◉	○	○
(U) External manager selection, appointment and monitoring (SAM) – listed equity - passive	◉	○	○
(V) External manager selection, appointment and monitoring (SAM) – fixed income - active	○	◉	○
(W) External manager selection, appointment and monitoring (SAM) – fixed income - passive	○	◉	○
(X) External manager selection, appointment and monitoring (SAM) – private equity	◉	○	○
(Y) External manager selection, appointment and monitoring (SAM) – real estate	○	◉	○

(Z) External manager selection, appointment and monitoring (SAM) – infrastructure	○	◉	○

SUBMISSION INFORMATION

REPORT DISCLOSURE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 32	CORE	OO 3, OO 31	N/A	PUBLIC	Report disclosure	GENERAL

How would you like to disclose the detailed percentage figures you reported throughout the Reporting Framework?

○ (A) Publish as absolute numbers
◉ **(B) Publish as ranges**

POLICY, GOVERNANCE AND STRATEGY (PGS)

POLICY

RESPONSIBLE INVESTMENT POLICY ELEMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 1	CORE	OO 8, OO 9	Multiple indicators	PUBLIC	Responsible investment policy elements	1, 2

Which elements are covered in your formal responsible investment policy(ies)?

☑ **(A) Overall approach to responsible investment**
☑ **(B) Guidelines on environmental factors**
☑ **(C) Guidelines on social factors**
☑ **(D) Guidelines on governance factors**
☑ **(E) Guidelines on sustainability outcomes**
☑ **(F) Guidelines tailored to the specific asset class(es) we hold**
☑ **(G) Guidelines on exclusions**
☐ (H) Guidelines on managing conflicts of interest related to responsible investment
☑ **(I) Stewardship: Guidelines on engagement with investees**
☑ **(J) Stewardship: Guidelines on overall political engagement**
☑ **(K) Stewardship: Guidelines on engagement with other key stakeholders**
☐ (L) Stewardship: Guidelines on (proxy) voting
☑ **(M) Other responsible investment elements not listed here**
Specify:

CONTROVERSIES

○ (N) Our organisation does not have a formal responsible investment policy and/or our policy(ies) do not cover any responsible investment elements

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 2	CORE	PGS 1	Multiple, see guidance	PUBLIC	Responsible investment policy elements	1

Does your formal responsible investment policy(ies) include specific guidelines on systematic sustainability issues?

☑ **(A) Specific guidelines on climate change (may be part of guidelines on environmental factors)**
☑ **(B) Specific guidelines on human rights (may be part of guidelines on social factors)**
☑ **(C) Specific guidelines on other systematic sustainability issues**
Specify:

https://www.afpintegra.pe/downloadable/nosotros/sostenibilidad/politica-inversion-sostenible-integra-2025.pdf (Controversies) and https://cdn01.sura.net.pe/integra/webapps/cercania/cms-lite/prod/resources/nosotros/sostenibilidad/politica-de-cambio-climatico.pdf (Climate Change Management)

○ (D) Our formal responsible investment policy(ies) does not include guidelines on systematic sustainability issues

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 3	CORE	PGS 1, PGS 2	N/A	PUBLIC	Responsible investment policy elements	6

Which elements of your formal responsible investment policy(ies) are publicly available?

☑ **(A) Overall approach to responsible investment**
Add link:

https://www.afpintegra.pe/downloadable/nosotros/sostenibilidad/politica-inversion-sostenible-integra-2025.pdf

☑ **(B) Guidelines on environmental factors**
Add link:

https://www.afpintegra.pe/downloadable/nosotros/sostenibilidad/politica-inversion-sostenible-integra-2025.pdf

☑ **(C) Guidelines on social factors**
Add link:

https://www.afpintegra.pe/downloadable/nosotros/sostenibilidad/politica-inversion-sostenible-integra-2025.pdf

☑ **(D) Guidelines on governance factors**
Add link:

https://www.afpintegra.pe/downloadable/nosotros/sostenibilidad/politica-inversion-sostenible-integra-2025.pdf

☐ (E) Guidelines on sustainability outcomes
☑ **(F) Specific guidelines on climate change (may be part of guidelines on environmental factors)**
Add link:

https://cdn01.sura.net.pe/integra/webapps/cercania/cms-lite/prod/resources/nosotros/sostenibilidad/politica-de-cambio-climatico.pdf

☐ (G) Specific guidelines on human rights (may be part of guidelines on social factors)
☐ (H) Specific guidelines on other systematic sustainability issues
☑ **(I) Guidelines tailored to the specific asset class(es) we hold**
Add link:

https://www.afpintegra.pe/downloadable/nosotros/sostenibilidad/politica-inversion-sostenible-integra-2025.pdf

☑ **(J) Guidelines on exclusions**
Add link:

https://www.afpintegra.pe/downloadable/nosotros/sostenibilidad/politica-inversion-sostenible-integra-2025.pdf

☑ **(L) Stewardship: Guidelines on engagement with investees**
Add link:

https://cdn01.sura.net.pe/integra/webapps/cercania/cms-lite/prod/resources/nosotros/sostenibilidad/lineamientos-de-engagement-y-propiedad-activa.pdf

☐ (M) Stewardship: Guidelines on overall political engagement
☑ **(N) Stewardship: Guidelines on engagement with other key stakeholders**
Add link:

https://cdn01.sura.net.pe/integra/webapps/cercania/cms-lite/prod/resources/nosotros/sostenibilidad/lineamientos-de-engagement-y-propiedad-activa.pdf

☐ (P) Other responsible investment aspects not listed here
○ (Q) No elements of our formal responsible investment policy(ies) are publicly available

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 5	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

Which elements are covered in your organisation's policy(ies) or guidelines on stewardship?

☑ **(A) Overall stewardship objectives**
☑ **(B) Prioritisation of specific ESG factors to be advanced via stewardship activities**
☐ (C) Criteria used by our organisation to prioritise the investees, policy makers, key stakeholders, or other entities on which to focus our stewardship efforts
☑ **(D) How different stewardship tools and activities are used across the organisation**
☑ **(E) Approach to escalation in stewardship**
☑ **(F) Approach to collaboration in stewardship**
☐ (G) Conflicts of interest related to stewardship
☑ **(H) How stewardship efforts and results are communicated across the organisation to feed into investment decision-making and vice versa**
☐ (I) Other
○ (J) None of the above elements is captured in our policy(ies) or guidelines on stewardship

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 7	CORE	OO 9	N/A	PUBLIC	Responsible investment policy elements	2

Does your organisation have a policy that states how (proxy) voting is addressed in your securities lending programme?

○ (A) We have a publicly available policy to address (proxy) voting in our securities lending programme
○ (B) We have a policy to address (proxy) voting in our securities lending programme, but it is not publicly available
○ (C) We rely on the policy of our external service provider(s)
○ (D) We do not have a policy to address (proxy) voting in our securities lending programme
◉ **(E) Not applicable; we do not have a securities lending programme**

RESPONSIBLE INVESTMENT POLICY COVERAGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 8	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy coverage	1

What percentage of your total AUM is covered by the below elements of your responsible investment policy(ies)?

	Combined AUM coverage of all policy elements
(A) Overall approach to responsible investment (B) Guidelines on environmental factors (C) Guidelines on social factors (D) Guidelines on governance factors	(7) 100%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 9	CORE	PGS 2	N/A	PUBLIC	Responsible investment policy coverage	1

What proportion of your AUM is covered by your formal policies or guidelines on climate change, human rights, or other systematic sustainability issues?

	AUM coverage
(A) Specific guidelines on climate change	(2) for a majority of our AUM
(B) Specific guidelines on human rights	(2) for a majority of our AUM
(C) Specific guidelines on other systematic sustainability issues	(2) for a majority of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10	CORE	OO 8, OO 9, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

Per asset class, what percentage of your AUM is covered by your policy(ies) or guidelines on stewardship with investees?

☑ **(A) Listed equity**
(1) Percentage of AUM covered
○ (1) >0% to 10%
○ (2) >10% to 20%
○ (3) >20% to 30%
○ (4) >30% to 40%
○ (5) >40% to 50%
○ (6) >50% to 60%
○ (7) >60% to 70%
○ (8) >70% to 80%
○ (9) >80% to 90%
○ (10) >90% to <100%
◉ **(11) 100%**
☑ **(B) Fixed income**
(1) Percentage of AUM covered
○ (1) >0% to 10%
○ (2) >10% to 20%
○ (3) >20% to 30%
○ (4) >30% to 40%
○ (5) >40% to 50%
○ (6) >50% to 60%
○ (7) >60% to 70%
○ (8) >70% to 80%
○ (9) >80% to 90%
○ (10) >90% to <100%
◉ **(11) 100%**
☐ (C) Private equity
☐ (D) Real estate
☐ (E) Infrastructure
☐ (I) Other

GOVERNANCE

ROLES AND RESPONSIBILITIES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11	CORE	N/A	Multiple indicators	PUBLIC	Roles and responsibilities	1

Which senior level body(ies) or role(s) in your organisation have formal oversight over and accountability for responsible investment?

☑ **(A) Board members, trustees, or equivalent**
☑ **(B) Senior executive-level staff, or equivalent**

Specify:

Aldo Ferrini (General Manager) and Jean Pierre Fournier (Chief Investment Officer)

☐ (C) Investment committee, or equivalent
☑ **(D) Head of department, or equivalent**
Specify department:

Risk Management Manager

○ (E) None of the above bodies and roles have oversight over and accountability for responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.1	CORE	PGS 1, PGS 2, PGS 11	N/A	PUBLIC	Roles and responsibilities	1, 2

Does your organisation's senior level body(ies) or role(s) have formal oversight over and accountability for the elements covered in your responsible investment policy(ies)?

	(1) Board members, trustees, or equivalent	(2) Senior executive-level staff, investment committee, head of department, or equivalent
(A) Overall approach to responsible investment	☑	☑
(B) Guidelines on environmental, social and/or governance factors	☑	☑
(C) Guidelines on sustainability outcomes	☐	☐
(D) Specific guidelines on climate change (may be part of guidelines on environmental factors)	☑	☑
(E) Specific guidelines on human rights (may be part of guidelines on social factors)	☑	☑
(F) Specific guidelines on other systematic sustainability issues	☑	☑
(G) Guidelines tailored to the specific asset class(es) we hold	☐	☐
(H) Guidelines on exclusions	☑	☑
(J) Stewardship: Guidelines on engagement with investees	☑	☑

(K) Stewardship: Guidelines on overall political engagement	☑	☑
(L) Stewardship: Guidelines on engagement with other key stakeholders	☑	☑
(N) This role has no formal oversight over and accountability for any of the above elements covered in our responsible investment policy(ies)	○	○

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.2	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1 – 6

Does your organisation have governance processes or structures to ensure that your overall political engagement is aligned with your commitment to the principles of PRI, including any political engagement conducted by third parties on your behalf?

◉ **(A) Yes**
Describe how you do this:

AFP Integra doesn’t exercise political engagement. The Peruvian AFP Association (which Integra is a member of), can exercise political engagement, however, a previous approval of Integra’s Management Committee is required to authorize the AFP Association to perform any type of political engagement.

○ (B) No
○ (C) Not applicable, our organisation does not conduct any form of political engagement directly or through any third parties

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 12	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1

In your organisation, which internal or external roles are responsible for implementing your approach to responsible investment?

☑ **(A) Internal role(s)**
Specify:

Investments, Risk Management, and Sustainability teams.

☑ **(B) External investment managers, service providers, or other external partners or suppliers**
Specify:

Only in the case of external investment managers, if they have explicit responsible investment guidelines.

○ (C) We do not have any internal or external roles with responsibility for implementing responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 13	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

Does your organisation use responsible investment KPIs to evaluate the performance of your board members, trustees, or equivalent?

○ (A) Yes, we use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent
◉ **(B) No, we do not use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent**
Explain why: (Voluntary)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 14	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

Does your organisation use responsible investment KPIs to evaluate the performance of your senior executive-level staff (or equivalent), and are these KPIs linked to compensation?

◉ **(A) Yes, we use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)**
Indicate whether these responsible investment KPIs are linked to compensation
◉ **(1) KPIs are linked to compensation**
○ (2) KPIs are not linked to compensation as these roles do not have variable compensation
○ (3) KPIs are not linked to compensation even though these roles have variable compensation
Describe: (Voluntary)

ESG KPIs for senior executives are linked to a part of their compensation

○ (B) No, we do not use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

EXTERNAL REPORTING AND DISCLOSURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 16	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

What elements are included in your regular reporting to clients and/or beneficiaries for the majority of your AUM?

☑ **(A) Any changes in policies related to responsible investment**
☑ **(B) Any changes in governance or oversight related to responsible investment**
☑ **(C) Stewardship-related commitments**
☑ **(D) Progress towards stewardship-related commitments**
☑ **(E) Climate–related commitments**
☐ (F) Progress towards climate–related commitments
☐ (G) Human rights–related commitments
☐ (H) Progress towards human rights–related commitments

☐ (I) Commitments to other systematic sustainability issues
☐ (J) Progress towards commitments on other systematic sustainability issues
○ (K) We do not include any of these elements in our regular reporting to clients and/or beneficiaries for the majority of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 17	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose climate-related information in line with the Task Force on Climate-Related Financial Disclosures' (TCFD) recommendations?

☑ **(A) Yes, including governance-related recommended disclosures**
☑ **(B) Yes, including strategy-related recommended disclosures**
☑ **(C) Yes, including risk management–related recommended disclosures**
☑ **(D) Yes, including applicable metrics and targets-related recommended disclosures**
○ (E) None of the above
Add link(s):

https://cdn01.sura.net.pe/integra/webapps/cercania/cms-lite/prod/resources/nosotros/sostenibilidad/reporte-de-inversion-sostenible-2024.pdf

Additional context to your response(s): (Voluntary)

We published our 2024 Sustainable Investing Report—part of our 2024 Annual Report—which includes a Climate Management Report aligned with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). This report outlines our governance structure, strategy, risk management approach, and the metrics and targets used to manage climate-related risks and opportunities. The 2024 Sustainable Investing Report also includes a Sustainability Factors Report, which details our portfolio's performance across a set of ESG metrics, including its carbon footprint.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 19	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose its membership in and support for trade associations, think tanks or similar bodies that conduct any form of political engagement?

◉ **(A) Yes, we publicly disclosed all of our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement**
Add link(s):

https://cdn01.sura.net.pe/integra/webapps/cercania/cms-lite/prod/resources/gobierno-corporativo/memoria-anual/memoria-anual-2024.pdf

○ (B) Yes, we publicly disclosed some of our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
○ (C) No, we did not publicly disclose our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
○ (D) Not applicable, we were not members in or supporters of any trade associations, think tanks, or similar bodies that conduct any form of political engagement during the reporting year

STRATEGY

CAPITAL ALLOCATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 20	CORE	N/A	N/A	PUBLIC	Capital allocation	1

Which elements do your organisation-level exclusions cover?

☑ **(A) Exclusions based on our organisation's values or beliefs regarding particular sectors, products or services**
☑ **(B) Exclusions based on our organisation's values or beliefs regarding particular regions or countries**
☑ **(C) Exclusions based on minimum standards of business practice aligned with international norms such as the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, UN Security Council sanctions or the UN Global Compact**
☐ (D) Exclusions based on our organisation's climate change commitments
☐ (E) Other elements
○ (F) Not applicable; our organisation does not have any organisation-level exclusions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 21	CORE	N/A	N/A	PUBLIC	Capital allocation	1

How does your responsible investment approach influence your strategic asset allocation process?

☑ **(A) We incorporate ESG factors into our assessment of expected asset class risks and returns**
Select from dropdown list:
- ○ (1) for all of our AUM subject to strategic asset allocation
- ◉ **(2) for a majority of our AUM subject to strategic asset allocation**
- ○ (3) for a minority of our AUM subject to strategic asset allocation

☑ **(B) We incorporate climate change–related risks and opportunities into our assessment of expected asset class risks and returns**
Select from dropdown list:
- ○ (1) for all of our AUM subject to strategic asset allocation
- ◉ **(2) for a majority of our AUM subject to strategic asset allocation**
- ○ (3) for a minority of our AUM subject to strategic asset allocation

☑ **(C) We incorporate human rights–related risks and opportunities into our assessment of expected asset class risks and returns**
Select from dropdown list:
- ○ (1) for all of our AUM subject to strategic asset allocation
- ◉ **(2) for a majority of our AUM subject to strategic asset allocation**
- ○ (3) for a minority of our AUM subject to strategic asset allocation

☐ (D) We incorporate risks and opportunities related to other systematic sustainability issues into our assessment of expected asset class risks and returns
○ (E) We do not incorporate ESG factors, climate change, human rights or other systematic sustainability issues into our assessment of expected asset class risks and returns
○ (F) Not applicable; we do not have a strategic asset allocation process

STEWARDSHIP: OVERALL STEWARDSHIP STRATEGY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 22	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

For the majority of AUM within each asset class, which of the following best describes your primary stewardship objective?

	(1) Listed equity	(2) Fixed income	(3) Private equity	(4) Real estate	(5) Infrastructure
(A) Maximise our portfolio-level risk-adjusted returns. In doing so, we seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.	◉	◉	○	○	○
(B) Maximise our individual investments' risk-adjusted returns. In doing so, we do not seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.	○	○	◉	◉	◉

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Which of the following best describes your organisation's default position, or the position of the external service providers or external managers acting on your behalf, concerning collaborative stewardship efforts?

◉ **(A) We recognise the value of collective action, and as a result, we prioritise collaborative stewardship efforts wherever possible**
○ (B) We collaborate on a case-by-case basis
○ (C) Other
○ (D) We do not join collaborative stewardship efforts

Additional context to your response(s): (Voluntary)

We believe that collective action significantly enhance the likelihood of achieving meaningful engagement outcomes with portfolio companies.

STEWARDSHIP: (PROXY) VOTING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 30	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

How is voting addressed in your securities lending programme?

○ (A) We recall all securities for voting on all ballot items
○ (B) When a vote is deemed important according to pre-established criteria (e.g. high stake in the company), we recall all our securities for voting
○ (C) Other
○ (D) We do not recall our securities for voting purposes
◉ **(E) Not applicable; we do not have a securities lending programme**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 31	CORE	OO 9.1	N/A	PUBLIC	Stewardship: (Proxy) voting	2

For the majority of votes cast over which you have discretion to vote, which of the following best describes your decision making approach regarding shareholder resolutions (or that of your external service provider(s) if decision making is delegated to them)?

◉ **(A) We vote in favour of resolutions expected to advance progress on our stewardship priorities, including affirming a company's good practice or prior commitment**
○ (B) We vote in favour of resolutions expected to advance progress on our stewardship priorities, but only if the investee company has not already publicly committed to the action(s) requested in the proposal
○ (C) We vote in favour of shareholder resolutions only as an escalation measure
○ (D) We vote in favour of the investee company management's recommendations by default
○ (E) Not applicable; we do not vote on shareholder resolutions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 32	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

During the reporting year, how did your organisation, or your external service provider(s), pre-declare voting intentions prior to voting in annual general meetings (AGMs) or extraordinary general meetings (EGMs)?

☐ (A) We pre-declared our voting intentions publicly through the PRI's vote declaration system on the Resolution Database
☐ (B) We pre-declared our voting intentions publicly by other means, e.g. through our website
☑ **(C) We privately communicated our voting decision to investee companies prior to the AGM/EGM**
○ (D) We did not privately or publicly communicate our voting intentions prior to the AGM/EGM
○ (E) Not applicable; we did not cast any (proxy) votes during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 33	CORE	OO 9	PGS 33.1	PUBLIC	Stewardship: (Proxy) voting	2

After voting has taken place, do you publicly disclose your (proxy) voting decisions or those made on your behalf by your external service provider(s), company by company and in a central source?

○ (A) Yes, for all (proxy) votes
◉ **(B) Yes, for the majority of (proxy) votes**
Add link(s):

https://www.afpintegra.pe/gobierno-corporativo?option=gobierno-corporativo

○ (C) Yes, for a minority of (proxy) votes
○ (D) No, we do not publicly report our (proxy) voting decisions company-by-company and in a central source

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 33.1	CORE	PGS 33	N/A	PUBLIC	Stewardship: (Proxy) voting	2

In the majority of cases, how soon after an investee's annual general meeting (AGM) or extraordinary general meeting (EGM) do you publish your voting decisions?

○ (A) Within one month of the AGM/EGM
◉ **(B) Within three months of the AGM/EGM**
○ (C) Within six months of the AGM/EGM
○ (D) Within one year of the AGM/EGM
○ (E) More than one year after the AGM/EGM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 34	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

After voting has taken place, did your organisation, and/or the external service provider(s) acting on your behalf, communicate the rationale for your voting decisions during the reporting year?

	(1) In cases where we abstained or voted against management recommendations	(2) In cases where we voted against an ESG-related shareholder resolution
(A) Yes, we publicly disclosed the rationale	(2) for a majority of votes	
(B) Yes, we privately communicated the rationale to the company	(2) for a majority of votes	

(C) We did not publicly or privately communicate the rationale, or we did not track this information	○	○
(D) Not applicable; we did not abstain or vote against management recommendations or ESG-related shareholder resolutions during the reporting year	○	◉

(A) Yes, we publicly disclosed the rationale - Add link(s):

https://cdn01.sura.net.pe/integra/webapps/cercania/cms-lite/prod/resources/gobierno-corporativo/fondos-de-pensiones/reportes/reporte-de-juntas-de-accionistas-2025.pdf

(D) Not applicable; we did not abstain or vote against management recommendations or ESG-related shareholder resolutions during the reporting year - Explain why:

ESG-related shareholders resolution don't require a vote (they are informative).

STEWARDSHIP: ESCALATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 36	CORE	OO 8, OO 9 HF, OO 9	N/A	PUBLIC	Stewardship: Escalation	2

For your listed equity holdings, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?

	(1) Listed equity
(A) Joining or broadening an existing collaborative engagement or creating a new one	☐
(B) Filing, co-filing, and/or submitting a shareholder resolution or proposal	☑
(C) Publicly engaging the entity, e.g. signing an open letter	☐
(D) Voting against the re-election of one or more board directors	☐

(E) Voting against the chair of the board of directors, or equivalent, e.g. lead independent director	☐
(F) Divesting	☑
(G) Litigation	☐
(H) Other	☐
(I) In the past three years, we did not use any of the above escalation measures for our listed equity holdings	○

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 37	CORE	Multiple, see guidance	N/A	PUBLIC	Stewardship: Escalation	2

For your corporate fixed income assets, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?

☑ **(A) Joining or broadening an existing collaborative engagement or creating a new one**
☐ (B) Publicly engaging the entity, e.g. signing an open letter
☑ **(C) Not investing**
☑ **(D) Reducing exposure to the investee entity**
☑ **(E) Divesting**
☐ (F) Litigation
☐ (G) Other
○ (H) In the past three years, we did not use any of the above escalation measures for our corporate fixed income assets

Additional context to your response(s): (Voluntary)

We take an active ownership approach and apply a tailored set of escalation measures on a case-by-case basis.

STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39	CORE	OO 8, OO 9	PGS 39.1, PGS 39.2	PUBLIC	Stewardship: Engagement with policy makers	2

Did your organisation, or the external investment managers or service providers acting on your behalf, engage with policy makers as part of your responsible investment approach during the reporting year?

☑ **(A) Yes, we engaged with policy makers directly**
☑ **(B) Yes, we engaged with policy makers through the leadership of or active participation in working groups or collaborative initiatives, including via the PRI**
☑ **(C) Yes, we were members of, supported, or were in another way affiliated with third party organisations, including trade associations and non-profit organisations, that engage with policy makers, excluding the PRI**
○ (D) We did not engage with policy makers directly or indirectly during the reporting year beyond our membership in the PRI

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.1	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, what methods did you, or the external investment managers or service providers acting on your behalf, use to engage with policy makers as part of your responsible investment approach?

☐ (A) We participated in 'sign-on' letters
☑ **(B) We responded to policy consultations**
☑ **(C) We provided technical input via government- or regulator-backed working groups**
Describe:

Our firm conviction in fostering a sustainable investment environment drives us to enhance ESG outcomes not only within our industry but also throughout the broader Peruvian market. To achieve this, we actively participate in working groups within the Responsible Investment Program (PIR, by its acronym in Spanish), a local investor association promoted by Integra and other representative stakeholders of the industry; and engage extensively with the companies in which we invest and regulators. For external investments managers, they use ESMA, BEAMA sustainability groups, PRI working groups such as GPRG.

☑ **(D) We engaged policy makers on our own initiative**
Describe:

We act proactively and have periodic interactions with regulators to address relevant regulatory matters that affect our operations. For external investments managers, they use BEAMA to explain SFDR practical consequences.

☐ (E) Other methods

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.2	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, did your organisation publicly disclose details of your engagement with policy makers conducted as part of your responsible investment approach, including through external investment managers or service providers?

☐ (A) We publicly disclosed all our policy positions
☐ (B) We publicly disclosed details of our engagements with policy makers
◉ **(C) No, we did not publicly disclose details of our engagement with policy makers conducted as part of our responsible investment approach during the reporting year**

Explain why:

During the reporting year, we worked with the Programa de Inversión Responsible (PIR) to develop materiality questionnaires (Financial Sector) which we seek to share with local regulators to enhance the ESG disclosure standard for public issuers. However, this is still work in progress.

CLIMATE CHANGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41	CORE	N/A	PGS 41.1	PUBLIC	Climate change	General

Has your organisation identified climate-related risks and opportunities affecting your investments?

☑ **(A) Yes, within our standard planning horizon**

Specify the risks and opportunities identified and your relevant standard planning horizon:

We published our 2024 Sustainable Investing Report which includes our Climate Management Report (formerly known as TCFD Report) (https://cdn01.sura.net.pe/integra/webapps/cercania/cms-lite/prod/resources/nosotros/sostenibilidad/reporte-de-inversion-sostenible-2024.pdf) (P.5-13). In this report we presented our approach to manage our portfolio's climate-related risks and opportunities. We described our climate governance structure, risk management, strategy and goals/metrics. We assessed the potential impact of a diverse set of transition and physical risks for our domestic portfolio. We used an external ESG service provider to assess the potential impact for our international portfolio. Based on the results of these assessments, the Risk Management Committee required additional evaluations for 2025.

☐ (B) Yes, beyond our standard planning horizon
○ (C) No, we have not identified climate-related risks and/or opportunities affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41.1	CORE	PGS 41	N/A	PUBLIC	Climate change	General

Does your organisation integrate climate-related risks and opportunities affecting your investments in its overall investment strategy, financial planning and (if relevant) products?

◉ **(A) Yes, our overall investment strategy, financial planning and (if relevant) products integrate climate-related risks and opportunities**

Describe how climate-related risks and opportunities have affected or are expected to affect your investment strategy, financial planning and (if relevant) products:

We published our 2024 Sustainable Investing Report, which includes our 2024 Climate Management Report (formerly known as the TCFD Report) (https://cdn01.sura.net.pe/integra/webapps/cercania/cms-lite/prod/resources/nosotros/sostenibilidad/reporte-de-inversion-sostenible-2024.pdf). This report outlines our governance structure, strategy, risk management framework, and the metrics and targets used to address climate-related risks and opportunities. We assessed the potential impact of a diverse set of transition and physical risks for our domestic portfolio. Based on the results of these assessments, the Risk Management Committee required additional evaluations for 2025, however, our Investment Strategy wasn't modified due to climate-related risks.

○ (B) No, our organisation has not yet integrated climate-related risks and opportunities into its investment strategy, financial planning and (if relevant) products

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 43	CORE	N/A	N/A	PUBLIC	Climate change	General

Has your organisation assessed the resilience of its investment strategy in different climate scenarios, including one in which the average temperature rise is held to below 2 degrees Celsius (preferably to 1.5 degrees Celsius) above pre-industrial levels?

☐ (A) Yes, using the Inevitable Policy Response Forecast Policy Scenario (FPS) or Required Policy Scenario (RPS)
☐ (B) Yes, using the One Earth Climate Model scenario
☐ (C) Yes, using the International Energy Agency (IEA) Net Zero scenario
☑ **(D) Yes, using other scenarios**
Specify:

In 2024, we have assessed the resilience of our portfolio using the Remind 1.5 and 2 C SSP2 Orderly scenarios and 1.5 C and 2 C AIM CE Advance using MSCI Climate VAR Module.

○ (E) No, we have not assessed the resilience of our investment strategy in different climate scenarios, including one that holds temperature rise to below 2 degrees

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 44	CORE	N/A	N/A	PUBLIC	Climate change	General

Does your organisation have a process to identify, assess, and manage the climate-related risks (potentially) affecting your investments?

☑ **(A) Yes, we have a process to identify and assess climate-related risks**
(1) Describe your process

Our Climate Management Policy outlines the guidelines we follow for identifying and managing climate-related risks and opportunities across our portfolio (Link: https://cdn01.sura.net.pe/integra/webapps/cercania/cms-lite/prod/resources/nosotros/sostenibilidad/politica-de-cambio-climatico.pdf). Our Investments and Risk Management teams participate in the biannual assessment of climate-related risks and opportunities. The results are present to our Risk Management Committee and our Board's Corporate Governance Committee for approval. We publicly disclose the results of this assessment annually in our Sustainable Investing Report (Link: https://cdn01.sura.net.pe/integra/webapps/cercania/cms-lite/prod/resources/nosotros/sostenibilidad/reporte-de-inversion-sostenible-2024.pdf).

(2) Describe how this process is integrated into your overall risk management

The climate-related risks reports are prepared by the Investments and Risk Management teams and insights from those reports are incorporated into the overall risk management process.

☐ (B) Yes, we have a process to manage climate-related risks

○ (C) No, we do not have any processes to identify, assess, or manage the climate-related risks affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 45	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, which of the following climate risk metrics or variables affecting your investments did your organisation use and publicly disclose?

☑ **(A) Exposure to physical risk**
(1) Indicate whether this metric or variable was used and disclosed, including the methodology
○ (1) Metric or variable used
○ (2) Metric or variable used and disclosed
◉ **(3) Metric or variable used and disclosed, including methodology**
(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://cdn01.sura.net.pe/integra/webapps/cercania/cms-lite/prod/resources/gobierno-corporativo/memoria-anual/memoria-anual-2024.pdf

☑ **(B) Exposure to transition risk**
(1) Indicate whether this metric or variable was used and disclosed, including the methodology
○ (1) Metric or variable used
○ (2) Metric or variable used and disclosed
◉ **(3) Metric or variable used and disclosed, including methodology**
(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://cdn01.sura.net.pe/integra/webapps/cercania/cms-lite/prod/resources/gobierno-corporativo/memoria-anual/memoria-anual-2024.pdf

☐ (C) Internal carbon price
☑ **(D) Total carbon emissions**
(1) Indicate whether this metric or variable was used and disclosed, including the methodology
○ (1) Metric or variable used
○ (2) Metric or variable used and disclosed
◉ **(3) Metric or variable used and disclosed, including methodology**
(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://cdn01.sura.net.pe/integra/webapps/cercania/cms-lite/prod/resources/gobierno-corporativo/memoria-anual/memoria-anual-2024.pdf

☐ (E) Weighted average carbon intensity
☐ (F) Avoided emissions
☐ (G) Implied Temperature Rise (ITR)
☐ (H) Non-ITR measure of portfolio alignment with UNFCCC Paris Agreement goals
☐ (I) Proportion of assets or other business activities aligned with climate-related opportunities
☐ (J) Other metrics or variables
○ (K) Our organisation did not use or publicly disclose any climate risk metrics or variables affecting our investments during the reporting year

Additional context to your response(s): (Voluntary)

See our 2024 Annual Report for our metrics and methodology (Link: https://cdn01.sura.net.pe/integra/webapps/cercania/cms-lite/prod/resources/gobierno-corporativo/memoria-anual/memoria-anual-2024.pdf) (p.79 and 82).

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 46	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, did your organisation publicly disclose its Scope 1, Scope 2, and/or Scope 3 greenhouse gas emissions?

☑ **(A) Scope 1 emissions**
(1) Indicate whether this metric was disclosed, including the methodology
○ (1) Metric disclosed
◉ **(2) Metric and methodology disclosed**
(2) Provide links to the disclosed metric and methodology, as applicable

https://cdn01.sura.net.pe/integra/webapps/cercania/cms-lite/prod/resources/gobierno-corporativo/memoria-anual/memoria-anual-2024.pdf

☑ **(B) Scope 2 emissions**
(1) Indicate whether this metric was disclosed, including the methodology
○ (1) Metric disclosed
◉ **(2) Metric and methodology disclosed**
(2) Provide links to the disclosed metric and methodology, as applicable

https://cdn01.sura.net.pe/integra/webapps/cercania/cms-lite/prod/resources/gobierno-corporativo/memoria-anual/memoria-anual-2024.pdf

☑ **(C) Scope 3 emissions (including financed emissions)**
(1) Indicate whether this metric was disclosed, including the methodology
○ (1) Metric disclosed
◉ **(2) Metric and methodology disclosed**
(2) Provide links to the disclosed metric and methodology, as applicable

https://cdn01.sura.net.pe/integra/webapps/cercania/cms-lite/prod/resources/gobierno-corporativo/memoria-anual/memoria-anual-2024.pdf

○ (D) Our organisation did not publicly disclose its Scope 1, Scope 2, or Scope 3 greenhouse gas emissions during the reporting year

Additional context to your response(s): (Voluntary)

See our 2024 Annual Report for our metrics and methodology (Link: https://cdn01.sura.net.pe/integra/webapps/cercania/cms-lite/prod/resources/gobierno-corporativo/memoria-anual/memoria-anual-2024.pdf) (p.79 and 82).

SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47	CORE	N/A	Multiple indicators	PUBLIC	Sustainability outcomes	1, 2

Has your organisation identified the intended and unintended sustainability outcomes connected to its investment activities?

○ (A) Yes, we have identified one or more specific sustainability outcomes connected to our investment activities
◉ **(B) No, we have not yet identified the sustainability outcomes connected to any of our investment activities**

Explain why:

We have progressively expanded the scope of our Responsible Investment Policy to include themes that we consider a priority. We haven’t include sustainability outcomes so far.

MANAGER SELECTION, APPOINTMENT AND MONITORING (SAM)

OVERALL APPROACH

EXTERNAL INVESTMENT MANAGERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 1	CORE	OO 21	N/A	PUBLIC	External investment managers	4

For the majority of your externally managed AUM in each asset class, which responsible investment aspects does your organisation consider important in the assessment of external investment managers?

	(1) Listed equity (active)	(2) Listed equity (passive)	(3) Fixed income (active)	(4) Fixed income (passive)
Organisation				
(A) Commitment to and experience in responsible investment	☑	☑	☑	☑
(B) Responsible investment policy(ies)	☑	☑	☑	☑
(C) Governance structure and senior-level oversight and accountability	☑	☑	☑	☑
People and Culture				
(D) Adequate resourcing and incentives	☑	☑	☑	☑
(E) Staff competencies and experience in responsible investment	☑	☑	☑	☑
Investment Process				
(F) Incorporation of material ESG factors in the investment process	☑	☑	☑	☑

(G) Incorporation of risks connected to systematic sustainability issues in the investment process	☑	☑	☑	☑
(H) Incorporation of material ESG factors and ESG risks connected to systematic sustainability issues in portfolio risk assessment	☑	☑	☑	☑
Stewardship				
(I) Policy(ies) or guidelines on stewardship	☑	☑	☑	☑
(J) Policy(ies) or guidelines on (proxy) voting	☑	☑	☑	☑
(K) Use of stewardship tools and activities	☑	☑	☑	☑
(L) Incorporation of risks connected to systematic sustainability issues in stewardship practices	☑	☑	☑	☑
(M) Involvement in collaborative engagement and stewardship initiatives	☑	☑	☑	☑
(N) Engagement with policy makers and other non-investee stakeholders	☐	☐	☐	☐
(O) Results of stewardship activities	☑	☑	☑	☑
Performance and Reporting				
(P) ESG disclosure in regular client reporting	☑	☑	☑	☑
(Q) Inclusion of ESG factors in contractual agreements	☑	☑	☑	☑
(R) We do not consider any of the above responsible investment aspects important in the assessment of external investment managers	○	○	○	○

	(5) Private equity	(6) Real estate	(7) Infrastructure
Organisation			
(A) Commitment to and experience in responsible investment	☐	☐	☐
(B) Responsible investment policy(ies)	☑	☑	☑
(C) Governance structure and senior-level oversight and accountability	☑	☑	☑
People and Culture			
(D) Adequate resourcing and incentives	☑	☑	☑
(E) Staff competencies and experience in responsible investment	☑	☑	☑
Investment Process			
(F) Incorporation of material ESG factors in the investment process	☑	☑	☑
(G) Incorporation of risks connected to systematic sustainability issues in the investment process	☐	☐	☐
(H) Incorporation of material ESG factors and ESG risks connected to systematic sustainability issues in portfolio risk assessment	☐	☐	☐
Stewardship			
(I) Policy(ies) or guidelines on stewardship	☑	☑	☑

(J) Policy(ies) or guidelines on (proxy) voting	☐	☐	☐
(K) Use of stewardship tools and activities	☐	☐	☐
(L) Incorporation of risks connected to systematic sustainability issues in stewardship practices	☐	☐	☐
(M) Involvement in collaborative engagement and stewardship initiatives	☐	☐	☐
(N) Engagement with policy makers and other non-investee stakeholders	☐	☐	☐
(O) Results of stewardship activities	☐	☐	☐
Performance and Reporting			
(P) ESG disclosure in regular client reporting	☑	☑	☑
(Q) Inclusion of ESG factors in contractual agreements	☑	☑	☑
(R) We do not consider any of the above responsible investment aspects important in the assessment of external investment managers	○	○	○

SERVICE PROVIDERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 2	CORE	OO 21	N/A	PUBLIC	Service providers	4

Which responsible investment aspects does your organisation consider important when assessing all service providers that advise you in the selection, appointment and/or monitoring of external investment managers?

☐ (A) Incorporation of their responsible investment policy into advisory services
☐ (B) Ability to accommodate our responsible investment policy
☐ (C) Level of staff's responsible investment expertise
☐ (D) Use of data and analytical tools to assess the external investment manager's responsible investment performance
☐ (E) Other

○ (F) We do not consider any of the above responsible investment aspects important when assessing service providers that advise us in the selection, appointment and/or monitoring of external investment managers
◉ **(G) Not applicable; we do not engage service providers in the selection, appointment or monitoring of external investment managers**

POOLED FUNDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 3	PLUS	OO 5.2, OO 21	N/A	PUBLIC	Pooled funds	4

If you invest in pooled funds, describe how you incorporate responsible investment aspects into the selection, appointment and/or monitoring of external investment managers.

	Provide example(s) below
(A) Selection	For mutual funds, we use MSCI ESG Manager data to assess the overall ESG scores/health of the funds' managers. We look at the overall ESG score, individual scores for each factor, controversies, and carbon metrics of the comparative fund group in question. We also assess the funds' SFDR categories to understand their objectives and commitment to ESG. From the alternative investments perspective, we include ESG-related questions in our Due Diligence Questionnaire. The responses are used to generate a score, which, along with other investment factors, serves as an input for the Recommendation Memorandum.
(B) Appointment	When we appoint a manager for a strategy (select and individual fund), we review MSCI data and approach the manager via e-mail to discuss any questions that may arise. From the alternative investments perspective, when we appoint a manager, we sign Side Letters where we include ESG opt-out clauses for industries we do not want to have an allocation to.
(C) Monitoring	We have an ESG Dashboard to monitor the scores for each individual fund that we invest in (active and passive). We look at aggregate and individual ESG scores, as well as to the results for sub sections that are relevant to the portfolio (asset classes, active vs passive, regions) to understand how each section and the asset allocation is affecting the overall ESG score. We also identify significant changes overtime and, if necessary, we engage with the manager in case we see a red flag, such as a score downgrade that does not reverse for an extended period. We created an ESG DDQ to individually assess each active manager's ESG Strategy, the alignment with our ESG policy, their climate change commitment and the reporting of related metrics, stewardship practices, and compliance monitoring. From alternative investments perspective, we monitor, through General Partners reporting, how the funds' portfolio companies' ESG initiatives and projects are evolving.

SELECTION

RESPONSIBLE INVESTMENT PRACTICES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 4	CORE	OO 12, OO 21	SAM 5, SAM 6, SAM 7	PUBLIC	Responsible investment practices	General

During the reporting year, did your organisation select new external investment managers or allocate new mandates to existing investment managers?

◉ **(A) Yes, we selected external investment managers or allocated new mandates to existing investment managers during the reporting year**
○ (B) No, we did not select new external investment managers or allocate new mandates to existing investment managers during the reporting year
○ (C) Not applicable; our organisation is in a captive relationship with external investment managers, which applies to 90% or more of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 5	CORE	SAM 4	N/A	PUBLIC	Responsible investment practices	4

During the reporting year, what responsible investment aspects did your organisation, or the service provider acting on your behalf, review and evaluate when selecting new external investment managers or allocating new mandates to existing investment managers?

Organisation
☑ **(A) Commitment to and experience in responsible investment (e.g. commitment to responsible investment principles and standards)**
Select from dropdown list
◉ **(1) for all of our mandates**
○ (2) for a majority of our mandates
○ (3) for a minority of our mandates
☑ **(B) Responsible investment policy(ies) (e.g. the alignment of their responsible investment policy with the investment mandate)**
Select from dropdown list
◉ **(1) for all of our mandates**
○ (2) for a majority of our mandates
○ (3) for a minority of our mandates
☑ **(C) Governance structure and senior-level oversight and accountability (e.g. the adequacy of their governance structure and reported conflicts of interest)**
Select from dropdown list
◉ **(1) for all of our mandates**
○ (2) for a majority of our mandates
○ (3) for a minority of our mandates
People and Culture
☑ **(D) Adequate resourcing and incentives (e.g. their team structures, operating model and remuneration structure, including alignment of interests)**
Select from dropdown list

◉ (1) for all of our mandates
○ (2) for a majority of our mandates
○ (3) for a minority of our mandates

☑ (E) Staff competencies and experience in responsible investment (e.g. level of responsible investment responsibilities in their investment team, their responsible investment training and capacity building)
Select from dropdown list
◉ (1) for all of our mandates
○ (2) for a majority of our mandates
○ (3) for a minority of our mandates

Investment Process

☑ (F) Incorporation of material ESG factors in the investment process (e.g. detail and evidence of how such factors are incorporated into the selection of individual assets and in portfolio construction)
Select from dropdown list
◉ (1) for all of our mandates
○ (2) for a majority of our mandates
○ (3) for a minority of our mandates

☑ (G) Incorporation of risks connected to systematic sustainability issues in the investment process (e.g. detail and evidence of how such risks are incorporated into the selection of individual assets and in portfolio construction)
Select from dropdown list
◉ (1) for all of our mandates
○ (2) for a majority of our mandates
○ (3) for a minority of our mandates

☑ (H) Incorporation of material ESG factors and ESG risks connected to systematic sustainability issues in portfolio risk assessment (e.g. their process to measure and report such risks)
Select from dropdown list
○ (1) for all of our mandates
◉ (2) for a majority of our mandates
○ (3) for a minority of our mandates

Performance and Reporting

☑ (I) ESG disclosure in regular client reporting
Select from dropdown list
◉ (1) for all of our mandates
○ (2) for a majority of our mandates
○ (3) for a minority of our mandates

☑ (J) Inclusion of ESG factors in contractual agreements
Select from dropdown list
○ (1) for all of our mandates
◉ (2) for a majority of our mandates
○ (3) for a minority of our mandates

○ (K) We did not review and evaluate any of the above responsible investment aspects when selecting new external investment managers or allocating new mandates to existing investment managers during the reporting year

STEWARDSHIP

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 6	CORE	OO 8, OO 21, SAM 4	N/A	PUBLIC	Stewardship	4

During the reporting year, which aspects of the stewardship approach did your organisation, or the service provider acting on your behalf, review and evaluate when selecting new external investment managers or allocating new mandates to existing investment managers?

☑ (A) The alignment of their policy(ies) or guidelines on stewardship with the investment mandate
Select from dropdown list
○ (1) for all of our mandates
◉ (2) for a majority of our mandates

- ○ (3) for a minority of our mandates

☑ **(B) Evidence of how they implemented their stewardship objectives, including the effectiveness of their activities**

Select from dropdown list

- ○ (1) for all of our mandates
- ◉ **(2) for a majority of our mandates**
- ○ (3) for a minority of our mandates

☑ **(C) Their participation in collaborative engagements and stewardship initiatives**

Select from dropdown list

- ◉ **(1) for all of our mandates**
- ○ (2) for a majority of our mandates
- ○ (3) for a minority of our mandates

☑ **(D) Details of their engagements with companies or issuers on risks connected to systematic sustainability issues**

Select from dropdown list

- ◉ **(1) for all of our mandates**
- ○ (2) for a majority of our mandates
- ○ (3) for a minority of our mandates

☑ **(E) Details of their engagement activities with policy makers**

Select from dropdown list

- ◉ **(1) for all of our mandates**
- ○ (2) for a majority of our mandates
- ○ (3) for a minority of our mandates

☑ **(F) Their escalation process and the escalation tools included in their policy on stewardship**

Select from dropdown list

- ◉ **(1) for all of our mandates**
- ○ (2) for a majority of our mandates
- ○ (3) for a minority of our mandates

○ (G) We did not review and evaluate any of the above aspects of the stewardship approach when selecting new external investment managers or allocating new mandates to existing investment managers during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 7	CORE	OO 9, OO 21, SAM 4	N/A	PUBLIC	Stewardship	4

During the reporting year, which aspects of (proxy) voting did your organisation, or the service provider acting on your behalf, review and evaluate when selecting new external investment managers or allocating new mandates to existing investment managers?

☐ (A) The alignment of their policy(ies) or guidelines on (proxy) voting with the investment mandate
☐ (B) Historical information on the number or percentage of general meetings at which they voted
☐ (C) Analysis of votes cast for and against
☐ (D) Analysis of votes cast for and against resolutions related to risks connected to systematic sustainability issues
☐ (E) Details of their position on any controversial and high-profile votes
☐ (F) Historical information of any resolutions on which they voted contrary to their own voting policy and the reasons why
☐ (G) Details of all votes involving companies where the external investment manager or an affiliate has a contractual relationship or another potential conflict of interest
◉ **(H) We did not review and evaluate any of the above aspects of (proxy) voting when selecting new external investment managers or allocating new mandates to existing investment managers during the reporting year**
○ (I) Not applicable; our organisation did not select new external investment managers or allocated new mandates to existing investment managers for listed equity and/or hedge funds that hold equity.

MONITORING

RESPONSIBLE INVESTMENT PRACTICES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 9	CORE	OO 14, OO 21	N/A	PUBLIC	Responsible investment practices	4

For the majority of your externally managed AUM in each asset class, which aspects of your external investment managers' responsible investment practices did your organisation, or the service provider acting on your behalf, monitor during the reporting year?

	(1) Listed equity (active)	(2) Listed equity (passive)	(3) Fixed income (active)	(4) Fixed income (passive)
Organisation				
(A) Commitment to and experience in responsible investment (e.g. commitment to responsible investment principles and standards)	☑	☑	☑	☑
(B) Responsible investment policy(ies) (e.g. the continued alignment of their responsible investment policy with the investment mandate)	☑	☑	☑	☑
(C) Governance structure and senior level oversight and accountability (e.g. the adequacy of their governance structure and reported conflicts of interest)	☑	☑	☑	☑
People and Culture				
(D) Adequate resourcing and incentives (e.g. their team structures, operating model and remuneration structure, including alignment of interests)	☑	☑	☑	☑

(E) Staff competencies and experience in responsible investment (e.g. level of responsible investment responsibilities in their investment team, their responsible investment training and capacity building)	☑	☑	☑	☑
Investment Process				
(F) Incorporation of material ESG factors in the investment process (e.g. detail and evidence of how such factors are incorporated into the selection of individual assets and in portfolio construction)	☑	☑	☑	☑
(G) Incorporation of risks connected to systematic sustainability issues in the investment process (e.g. detail and evidence of how such risks are incorporated into the selection of individual assets and in portfolio construction)	☑	☑	☑	☑
(H) Incorporation of material ESG factors and ESG risks connected to systematic sustainability issues in portfolio risk assessment (e.g. their process to measure and report such risks, their response to ESG incidents)	☑	☑	☑	☑
Performance and Reporting				
(I) ESG disclosure in regular client reporting (e.g. any changes in their regular client reporting)	☑	☑	☑	☑
(J) Inclusion of ESG factors in contractual agreements	☐	☐	☐	☐
(K) We did not monitor any of the above aspects of our external investment managers' responsible investment practices during the reporting year	○	○	○	○

	(5) Private equity	(6) Real estate	(7) Infrastructure
Organisation			
(A) Commitment to and experience in responsible investment (e.g. commitment to responsible investment principles and standards)	☑	☑	☑
(B) Responsible investment policy(ies) (e.g. the continued alignment of their responsible investment policy with the investment mandate)	☑	☑	☑
(C) Governance structure and senior level oversight and accountability (e.g. the adequacy of their governance structure and reported conflicts of interest)	☑	☑	☑
People and Culture			
(D) Adequate resourcing and incentives (e.g. their team structures, operating model and remuneration structure, including alignment of interests)	☑	☑	☑
(E) Staff competencies and experience in responsible investment (e.g. level of responsible investment responsibilities in their investment team, their responsible investment training and capacity building)	☑	☑	☑
Investment Process			

(F) Incorporation of material ESG factors in the investment process (e.g. detail and evidence of how such factors are incorporated into the selection of individual assets and in portfolio construction)	☑	☑	☑
(G) Incorporation of risks connected to systematic sustainability issues in the investment process (e.g. detail and evidence of how such risks are incorporated into the selection of individual assets and in portfolio construction)	☐	☐	☐
(H) Incorporation of material ESG factors and ESG risks connected to systematic sustainability issues in portfolio risk assessment (e.g. their process to measure and report such risks, their response to ESG incidents)	☑	☑	☑
Performance and Reporting			
(I) ESG disclosure in regular client reporting (e.g. any changes in their regular client reporting)	☑	☑	☑
(J) Inclusion of ESG factors in contractual agreements	☑	☑	☑
(K) We did not monitor any of the above aspects of our external investment managers' responsible investment practices during the reporting year	○	○	○

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 12	CORE	OO 14, OO 21	N/A	PUBLIC	Responsible investment practices	1

For the majority of your externally managed AUM in each asset class, how often does your organisation, or the service provider acting on your behalf, monitor your external investment managers' responsible investment practices?

	(1) Listed equity (active)	(2) Listed equity (passive)	(3) Fixed income (active)	(4) Fixed income (passive)
(A) At least annually	☑	☑	☑	☑
(B) Less than once a year	☐	☐	☐	☐

(C) On an ad hoc basis	☐	☐	☐	☐

	(5) Private equity	(6) Real estate	(7) Infrastructure
(A) At least annually	☑	☑	☑
(B) Less than once a year	☐	☐	☐
(C) On an ad hoc basis	☐	☐	☐

STEWARDSHIP

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 13	CORE	OO 8, OO 21	N/A	PUBLIC	Stewardship	1, 2

For the majority of your externally managed AUM in each asset class, which aspects of your external investment managers' stewardship practices did your organisation, or the service provider acting on your behalf, monitor during the reporting year?

	(1) Listed equity (active)	(2) Listed equity (passive)	(3) Fixed income (active)	(4) Fixed income (passive)
(A) Any changes in their policy(ies) or guidelines on stewardship	☑	☑	☑	☑
(B) The degree of implementation of their policy(ies) or guidelines on stewardship	☑	☑	☑	☑
(C) How they prioritise material ESG factors	☑	☑	☑	☑
(D) How they prioritise risks connected to systematic sustainability issues	☑	☑	☑	☑
(E) Their investment team's level of involvement in stewardship activities	☑	☑	☑	☑

(F) Whether the results of stewardship actions were fed back into the investment process and decisions	☑	☑	☑	☑
(G) Whether they used a variety of stewardship tools and activities to advance their stewardship priorities	☐	☐	☐	☐
(H) The deployment of their escalation process in cases where initial stewardship efforts were unsuccessful	☐	☐	☐	☐
(I) Whether they participated in collaborative engagements and stewardship initiatives	☑	☑	☑	☑
(J) Whether they had an active role in collaborative engagements and stewardship initiatives	☑	☑	☑	☐
(K) Other	☐	☐	☐	☐
(L) We did not monitor our external investment managers’ stewardship practices during the reporting year	○	○	○	○

	(5) Private equity	**(6) Real estate**	**(7) Infrastructure**
(A) Any changes in their policy(ies) or guidelines on stewardship	☑	☑	☑
(B) The degree of implementation of their policy(ies) or guidelines on stewardship	☐	☐	☐
(C) How they prioritise material ESG factors	☑	☑	☑

(D) How they prioritise risks connected to systematic sustainability issues	☐	☐	☐
(E) Their investment team's level of involvement in stewardship activities	☑	☑	☑
(F) Whether the results of stewardship actions were fed back into the investment process and decisions	☑	☑	☑
(G) Whether they used a variety of stewardship tools and activities to advance their stewardship priorities	☐	☐	☐
(H) The deployment of their escalation process in cases where initial stewardship efforts were unsuccessful	☐	☐	☐
(I) Whether they participated in collaborative engagements and stewardship initiatives	☑	☑	☑
(J) Whether they had an active role in collaborative engagements and stewardship initiatives	☐	☐	☐
(K) Other	☐	☐	☐
(L) We did not monitor our external investment managers' stewardship practices during the reporting year	○	○	○

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 14	CORE	OO 9, OO 21	N/A	PUBLIC	Stewardship	1, 2

For the majority of your AUM in each asset class where (proxy) voting is delegated to external investment managers, which aspects of your external investment managers' (proxy) voting practices did your organisation, or the service provider acting on your behalf, monitor during the reporting year?

	(1) Listed equity (active)	(2) Listed equity (passive)
(A) Any changes in their policy(ies) or guidelines on (proxy) voting	☐	☐
(B) Whether their (proxy) voting decisions were consistent with their stewardship priorities as stated in their policy and with their voting policy, principles and/or guidelines	☐	☐
(C) Whether their (proxy) voting decisions were consistent with their stated approach on the prioritisation of risks connected to systematic sustainability issues	☐	☐
(D) Whether their (proxy) voting track record was aligned with our stewardship approach and expectations	☐	☐
(E) The application of their policy on securities lending and any implications for implementing their policy(ies) or guidelines on (proxy) voting (where applicable)	☐	☐
(F) Other	☐	☐
(G) We did not monitor our external investment managers' (proxy) voting practices during the reporting year	◉	◉

ENGAGEMENT AND ESCALATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 16	CORE	OO 14, OO 21	N/A	PUBLIC	Engagement and escalation	4

What actions does your organisation, or the service provider acting on your behalf, include in its formal escalation process to address concerns raised during monitoring of your external investment managers' responsible investment practices?

	(1) Listed equity (active)	(2) Listed equity (passive)	(3) Fixed income (active)	(4) Fixed income (passive)
(A) Engagement with their investment professionals, investment committee or other representatives	☑	☑	☑	☑
(B) Notification about their placement on a watch list or relationship coming under review	☑	☑	☑	☑
(C) Reduction of capital allocation to the external investment managers until any concerns have been rectified	☑	☑	☑	☑
(D) Termination of the contract if failings persist over a (notified) period, including an explanation of the reasons for termination	☑	☑	☑	☑
(E) Holding off selecting the external investment managers for new mandates or allocating additional capital until any concerns have been rectified	☑	☑	☑	☑
(F) Other	☐	☐	☐	☐
(G) Our organisation does not have a formal escalation process to address concerns raised during monitoring	○	○	○	○

	(5) Private equity	(6) Real estate	(7) Infrastructure
(A) Engagement with their investment professionals, investment committee or other representatives	☐	☐	☐
(B) Notification about their placement on a watch list or relationship coming under review	☑	☑	☑
(C) Reduction of capital allocation to the external investment managers until any concerns have been rectified	☐	☐	☐
(D) Termination of the contract if failings persist over a (notified) period, including an explanation of the reasons for termination	☐	☐	☐
(E) Holding off selecting the external investment managers for new mandates or allocating additional capital until any concerns have been rectified	☐	☐	☐
(F) Other	☑	☑	☑
(G) Our organisation does not have a formal escalation process to address concerns raised during monitoring	○	○	○

(F) Other - Specify:

Although we don’t have specific formal guidelines, for Alternatives, whenever we encountered an issue or controversy, we approached the manager via e-mail with questions regarding the occurrence in order to look for any material risks that could compromise the entity or the investments.

VERIFICATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 17	CORE	OO 14, OO 21	N/A	PUBLIC	Verification	1

For the majority of your externally managed AUM in each asset class, how did your organisation, or the service provider acting on your behalf, verify that the information reported by external investment managers on their responsible investment practices was correct during the reporting year?

	(1) Listed equity (active)	(2) Listed equity (passive)	(3) Fixed income (active)	(4) Fixed income (passive)
(A) We checked that the information reported was verified through a third-party assurance process	☐	☐	☐	☐
(B) We checked that the information reported was verified by an independent third party	☐	☐	☐	☐
(C) We checked for evidence of internal monitoring or compliance	☑	☑	☑	☑
(D) Other	☐	☐	☐	☐
(E) We did not verify the information reported by external investment managers on their responsible investment practices during the reporting year	○	○	○	○

	(5) Private equity	(6) Real estate	(7) Infrastructure
(A) We checked that the information reported was verified through a third-party assurance process	☐	☐	☐
(B) We checked that the information reported was verified by an independent third party	☐	☐	☐
(C) We checked for evidence of internal monitoring or compliance	☐	☐	☐
(D) Other	☐	☐	☐
(E) We did not verify the information reported by external investment managers on their responsible investment practices during the reporting year	◉	◉	◉

CONFIDENCE-BUILDING MEASURES (CBM)

CONFIDENCE-BUILDING MEASURES

APPROACH TO CONFIDENCE-BUILDING MEASURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 1	CORE	N/A	Multiple indicators	PUBLIC	Approach to confidence-building measures	6

How did your organisation verify the information submitted in your PRI report this reporting year?

☐ (A) We conducted independent third-party assurance of selected processes and/or data related to the responsible investment processes reported in our PRI report, which resulted in a formal assurance conclusion
☐ (B) We conducted a third-party readiness review and are making changes to our internal controls or governance processes to be able to conduct independent third-party assurance next year
☐ (C) We conducted an internal audit of selected processes and/or data related to the responsible investment processes reported in our PRI report
☑ **(D) Our board, trustees (or equivalent), senior executive-level staff (or equivalent), and/or investment committee (or equivalent) signed off on our PRI report**
☑ **(E) Our responses in selected sections and/or the entirety of our PRI report were internally reviewed before submission to the PRI**
○ (F) We did not verify the information submitted in our PRI report this reporting year

Additional context to your response(s): (Voluntary)

The head of sustainable investing reviewed the entire report. Selected sections of the report were reviewed by senior executive-level staff.

INTERNAL REVIEW

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 6	CORE	CBM 1	N/A	PUBLIC	Internal review	6

Who in your organisation reviewed the responses submitted in your PRI report this year?

☐ (A) Board, trustees, or equivalent
☑ **(B) Senior executive-level staff, investment committee, head of department, or equivalent**
Sections of PRI report reviewed
◉ **(1) the entire report**
○ (2) selected sections of the report
○ (C) None of the above internal roles reviewed selected sections or the entirety of the responses submitted in our PRI report this year

Additional context to your response(s): (Voluntary)

The head of sustainable investing reviewed the entire report. Selected sections of the report were reviewed by senior executive-level staff.