



# RI TRANSPARENCY REPORT 2018

## Insight Investment

OO 01	Mandatory	Gateway/Peering	General								
OO 01.1	Select the services and funds you offer										
<input checked="" type="checkbox"/> Fund management											
<table border="1"> <tr> <td colspan="2">% of assets under management (AUM) in ranges</td> </tr> <tr> <td><input type="radio"/></td> <td>&lt;10%</td> </tr> <tr> <td><input type="radio"/></td> <td>10-50%</td> </tr> <tr> <td><input checked="" type="radio"/></td> <td>&gt;50%</td> </tr> </table>				% of assets under management (AUM) in ranges		<input type="radio"/>	<10%	<input type="radio"/>	10-50%	<input checked="" type="radio"/>	>50%
% of assets under management (AUM) in ranges											
<input type="radio"/>	<10%										
<input type="radio"/>	10-50%										
<input checked="" type="radio"/>	>50%										
<input type="checkbox"/> Fund of funds, manager of managers, sub-advised products											
<input type="checkbox"/> Other, specify											
OO 01.3	Additional information. [Optional]										
<p>Insight[1] is one of Europe's largest investment managers[2] responsible for £585bn[3] in assets under management (AUM) across fixed income, risk management strategies including liability-driven investment (LDI) and currency risk management, absolute return and multi-asset capabilities.</p> <p>Based in London, Insight is a specialist asset manager with a global network of operations in the UK, US, Japan and Australia. Our clients include pension funds, corporates, local authorities, insurers, sovereign wealth funds, wealth managers, financial institutions and supranationals.</p> <p>At the heart of our investment philosophy is a desire to offer clients innovative yet practical solutions. To achieve this, we combine expertise, strength and depth of knowledge with innovation across a broad range of asset classes and the risk/return spectrum to offer our clients complete flexibility; an essential tool in delivering tailored client solutions. A team-oriented approach is the lynchpin of our business and means that we can draw on the in-house expertise of high calibre professionals at any time. Our investment professionals are specialists in their field meaning we have the right people doing the right jobs for our clients.</p> <p>[1] Insight is the corporate brand for certain companies operated by Insight Investment Management Limited (IIML). Insight includes, among others, Insight Investment Management (Global) Limited (IIMG), Insight Investment International Limited (IILL), Cutwater Asset Management Corp. (CAMC), Cutwater Investor Services Corp. (CISC) and Insight North America LLC (INA), each of which provides asset management services.</p> <p>[2] Source: IPE, 'Top 400 Asset Managers' survey, June 2017. Insight is ranked third out of the top 120 European institutional managers by total AUM for external Europe-domiciled institutional clients.</p> <p>[3] Data as at 31 December 2017. AUM are represented by the value of cash securities and other economic exposure managed for clients.</p>											
OO 02	Mandatory	Peering	General								
OO 02.1	Select the location of your organisation's headquarters.										
United Kingdom											
OO 02.2	Indicate the number of countries in which you have offices (including your headquarters).										
<input type="radio"/> 1 <input checked="" type="radio"/> 2-5 <input type="radio"/> 6-10 <input type="radio"/> >10											
OO 02.3	Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).										
757.											
OO 02.4	Additional information. [Optional]										
<p>Data for FTE is provided as at 31 December 2017.</p> <p>Includes employees of our affiliates INA, CAMC and CISC, each of which provides asset management services as part of Insight, the corporate brand for certain companies operated by IIML.</p>											
OO 03	Mandatory	Descriptive	General								
OO 03.1	Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.										
<input type="radio"/> Yes <input checked="" type="radio"/> No											
OO 04	Mandatory	Gateway/Peering	General								
OO 04.1	Indicate the year end date for your reporting year.										
31/12/2017											
OO 04.2	Indicate your total AUM at the end of your reporting year, Exclude subsidiaries you have chosen not to report on and any advisory/execution only assets.										
<p>Total AUM</p> <p>584,892,467,422 GBP</p> <p>789,894,017,285 USD</p>											
OO 04.5	Additional information. [Optional]										
Represents the AUM of Insight as defined earlier. AUM are represented by the value of cash securities and other economic exposure managed for clients.											

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

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

If you respond 'Other (1)', specify for Internally Managed

Represents AUM for liability-driven investment (LDI)

If you respond 'Other (2)', specify for Internally Managed

Represents AUM for currency management, multi-asset and real assets.

OO 05.2 Indicate whether your organisation uses fiduciary managers.

- Yes, we use a fiduciary manager and our response to OO 5.1 is reflective of their management of our assets.
- No, we do not use fiduciary managers.

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

- as percentage breakdown
- as broad ranges

'Other (1)' specified

Represents AUM for liability-driven investment (LDI)

'Other (2)' specified

Represents AUM for currency management, multi-asset and real assets.

OO 06.2 Publish asset class mix as per attached image [Optional].

OO 07.1 Provide to the nearest 5% the percentage breakdown of your Fixed Income AUM at the end of your reporting year, using the following categories.

Private

OO 09.1 Indicate the breakdown of your organisation's AUM by market.

Private

OO 09.2 Additional information. [Optional]

Private

OO 10.1 Select the active ownership activities your organisation implemented in the reporting year.

Listed equity – engagement	
<input checked="" type="checkbox"/>	We engage with companies on ESG factors via our staff, collaborations or service providers.
<input type="checkbox"/>	We do not engage directly and do not require external managers to engage with companies on ESG factors.
Listed equity – voting	
<input checked="" type="checkbox"/>	We cast our (proxy) votes directly or via dedicated voting providers
<input type="checkbox"/>	We do not cast our (proxy) votes directly and do not require external managers to vote on our behalf
Fixed income SSA – engagement	
<input checked="" type="checkbox"/>	We engage with companies on ESG factors via our staff, collaborations or service providers.
<input type="checkbox"/>	We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.
Fixed income Corporate (financial) – engagement	
<input checked="" type="checkbox"/>	We engage with companies on ESG factors via our staff, collaborations or service providers.
<input type="checkbox"/>	We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.
Fixed income Corporate (non-financial) – engagement	
<input checked="" type="checkbox"/>	We engage with companies on ESG factors via our staff, collaborations or service providers.
<input type="checkbox"/>	We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.
Fixed income Corporate (securitised) – engagement	
<input checked="" type="checkbox"/>	We engage with companies on ESG factors via our staff, collaborations or service providers.
<input type="checkbox"/>	We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.

OO 11	Mandatory	Gateway	General
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OO 11.1	Select the internally managed asset classes in which you addressed ESG incorporation into your investment decisions and/or your active ownership practices (during the reporting year).
Listed equity	
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
Fixed income - SSA	
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
Fixed income - corporate (financial)	
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
Fixed income - corporate (non-financial)	
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
Fixed income - securitised	
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
Other (1)	
<input type="checkbox"/>	We address ESG incorporation.
<input checked="" type="checkbox"/>	We do not do ESG incorporation.
Other (2)	
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
'Other (1)' [as defined in OO 05]	
Represents AUM for liability-driven investment (LDI).	
'Other (2)' [as defined in OO 05]	
Represents AUM for currency management, multi-asset and real assets.	

OO 12	Mandatory	Gateway	General
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OO 12.1 Below are all applicable modules or sections you may report on. Those which are mandatory to report (asset classes representing 10% or more of your AUM) are already ticked and read-only. Those which are voluntary to report on can be opted into by ticking the box.

Core modules	
<input checked="" type="checkbox"/>	Organisational Overview
<input checked="" type="checkbox"/>	Strategy and Governance
RI implementation directly or via service providers	
Direct - Listed Equity incorporation	
<input type="checkbox"/>	Listed Equity incorporation
Direct - Listed Equity active ownership	
<input type="checkbox"/>	Engagements
<input type="checkbox"/>	(Proxy) voting
Direct - Fixed Income	
<input checked="" type="checkbox"/>	Fixed income - SSA
<input checked="" type="checkbox"/>	Fixed income - Corporate (financial)
<input checked="" type="checkbox"/>	Fixed income - Corporate (non-financial)
<input checked="" type="checkbox"/>	Fixed income - Securitised
Closing module	
<input checked="" type="checkbox"/>	Closing module

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

Private

OO LE 01.2 Additional information. [Optional]

Private

OO FI 01	Mandatory to Report, Voluntary to Disclose	Gateway	General
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OO FI 01.1 Provide a breakdown of your internally managed fixed income securities by active and passive strategies

Private

OO FI 01.2 Additional information. [Optional]

Private

OO FI 03	Mandatory to Report, Voluntary to Disclose	Descriptive	General
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OO FI 03.1 Indicate the approximate (+/- 5%) breakdown of your SSA investments, by developed markets and emerging markets.

Private

OO FI 03.3 Additional information. [Optional]

Private

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

SG 01.2	Indicate the components/types and coverage of your policy.
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Policy components/types	Coverage by AUM
<input checked="" type="checkbox"/> Policy setting out your overall approach <input type="checkbox"/> Formalised guidelines on environmental factors <input type="checkbox"/> Formalised guidelines on social factors <input type="checkbox"/> Formalised guidelines on corporate governance factors <input type="checkbox"/> Asset class-specific RI guidelines <input type="checkbox"/> Sector specific RI guidelines <input checked="" type="checkbox"/> Screening / exclusions policy <input checked="" type="checkbox"/> Engagement policy <input checked="" type="checkbox"/> (Proxy) voting policy <input type="checkbox"/> Other, specify (1) <input type="checkbox"/> Other, specify(2)	<input checked="" type="checkbox"/> Applicable policies cover all AUM <input type="checkbox"/> Applicable policies cover a majority of AUM <input type="checkbox"/> Applicable policies cover a minority of AUM

SG 01.3	Indicate if the investment policy covers any of the following
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- Your organisation's definition of ESG and/or responsible investment and it's relation to investments
- Your investment objectives that take ESG factors/real economy influence into account
- Time horizon of your investment
- Governance structure of organisational ESG responsibilities
- ESG incorporation approaches
- Active ownership approaches
- Reporting
- Climate change and related issues

SG 01.3a CC	Describe how your products or investment strategy might be affected by the transition to a lower-carbon economy.
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Private

SG 01.3b CC	Describe how climate-related risks and opportunities are factored into your investment strategies or products.
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Private

- Other RI considerations, specify (1)
- Other RI considerations, specify (2)

SG 01.4	Describe your organisation's investment principles and overall investment strategy, and how they consider ESG factors and real economy impact.
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We believe strong governance practices and management of environmental and social risks are important drivers of investment value over the short and long term. We also believe that delivering sustainable investment returns is dependent on efficient and well-managed financial markets, and stable and transparent social, environmental and economic systems.

Our objective is to achieve superior investment returns over clients' expected time horizons. We consider responsible investment to contribute towards this goal through providing investment solutions that deliver quality and excellence; managing financial and non-financial risks for our clients; and operating to high ethical and professional standards.

We consider responsible investment as central to our investment activities, to our culture, to relationship with clients and to interaction with stakeholders.

To deliver on our objectives, we:

Take account of financially material short and long-term risk factors in our investment research and decision-making processes. These risk factors may include ESG issues.

Exercise our stewardship role in the companies and other entities in which we invest. We believe that good stewardship can create investment opportunities and reduce investment risk.

Support efforts that seek to improve the operation, resilience and stability of financial markets. This includes sustainable economic development and health of the natural environment.

No

SG 02.1	Indicate which of your investment policy documents (if any) are publicly available. Provide a URL and an attachment of the document.
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- Policy setting out your overall approach

	URL/Attachment
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- URL  
<https://www.insightinvestment.com/uk/responsible-investment/insights-ri-policy/>
- Attachment (will be made public)

Screening / exclusions policy

URL/Attachment	
<input checked="" type="checkbox"/> URL	<a href="https://www.insightinvestment.com/globalassets/documents/responsible-investment/cluster-munitions-and-landmines-policy/glo_cluster_munitions_and_landmines_investment_policy-2017.pdf">https://www.insightinvestment.com/globalassets/documents/responsible-investment/cluster-munitions-and-landmines-policy/glo_cluster_munitions_and_landmines_investment_policy-2017.pdf</a>
<input type="checkbox"/> Attachment (will be made public)	

Engagement policy

(Proxy) voting policy

URL/Attachment	
<input type="checkbox"/> URL	
<input checked="" type="checkbox"/> Attachment (will be made public)	Files: <a href="#">link</a> , <a href="#">link</a>

We do not publicly disclose our investment policy documents

**SG 02.2** Indicate if any of your investment policy components are publicly available. Provide URL and an attachment of the document.

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

URL/Attachment	
<input checked="" type="checkbox"/> URL	<a href="https://www.insightinvestment.com/uk/responsible-investment/insights-ri-policy/">https://www.insightinvestment.com/uk/responsible-investment/insights-ri-policy/</a>
<input type="checkbox"/> Attachment	

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

Time horizon of your investment

ESG incorporation approaches

URL/Attachment	
<input checked="" type="checkbox"/> URL	<a href="https://www.insightinvestment.com/uk/responsible-investment/insights-ri-policy/">https://www.insightinvestment.com/uk/responsible-investment/insights-ri-policy/</a>
<input type="checkbox"/> Attachment	

Active ownership approaches

URL/Attachment	
<input checked="" type="checkbox"/> URL	<a href="https://www.insightinvestment.com/uk/responsible-investment/stewardship-essentials/">https://www.insightinvestment.com/uk/responsible-investment/stewardship-essentials/</a>
<input type="checkbox"/> Attachment	

**Climate change and related issues**

Private

We do not publicly disclose any investment policy components

**SG 02.3** Indicate if your organisation's investment principles, and overall investment strategy is publicly available

Yes

<https://www.insightinvestment.com/uk/introducing-insight/>

No

**SG 03** Mandatory Core Assessed General

**SG 03.1** Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.

Yes

**SG 03.2** Describe your policy on managing potential conflicts of interest in the investment process.

Insight believes it has a duty to protect its clients against any potential conflicts of interest and manages any that arise fairly and in accordance with the Financial Conduct Authority (FCA) Rules and Principles.

We have a conflicts of interest policy that details the processes in place to reduce the possibility of conflicts arising and, if they do, the guiding principles which should be used in their resolution. Furthermore, Insight has no connection with any market-making organisation, nor does it participate in providing advice on corporate finance or underwriting or any other activities which would give rise to a conflict of interest within the organisation.

Insight does not place its own interests unfairly above those of its customers. Where potential conflicts arise, Insight will not enter into a transaction until it has ensured the fair treatment for all customers.

Insight staff are required to adhere to the Personal Account Dealing, Gift and Entertainment and Chinese Walls policies, all of which are available to staff within the Insight Compliance Manual.

No

SG 04	Voluntary	Descriptive	General
SG 04.1	Indicate if your organisation has a process for identifying and managing incidents that occur within portfolio companies.		
Private			
SG 04.2	Describe your process on managing incidents		
Private			
SG 05	Mandatory	Gateway/Core Assessed	General
SG 05.1	Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.		
<input type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input checked="" type="radio"/> Annually <input type="radio"/> Less frequently than annually <input type="radio"/> Ad-hoc basis <input type="radio"/> It is not set/reviewed			
SG 05.2	Additional information. [Optional]		
<p>While Insight reviews its responsible investment policy annually and reports on its activities in an annual responsible investment report, on a quarterly, or more frequent basis, Insight operates an ESG Working Group with responsibility for reviewing key ESG issues. The ESG Working Group contains investment and risk professionals, responsible investment advisor and ESG analyst supporting key information through the committee for discussion and action. We inform ourselves of important developments by participating in industry initiatives, subscribing to news services and discussing issues directly with our clients, consultants and other stakeholders.</p>			
SG 06	Voluntary	Descriptive	General
SG 06.1	List the main responsible investment objectives that your organisation set for the reporting year.		
Private			
SG 06.2	Additional information.		
Private			
SG 07	Mandatory	Core Assessed	General
SG 07.1	Indicate the roles present in your organisation and for each, indicate whether they have oversight and/or implementation responsibilities for responsible investment.		
Roles present in your organisation			
<input checked="" type="checkbox"/> Board members or trustees <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Oversight/accountability for responsible investment</li> <li><input type="checkbox"/> Implementation of responsible investment</li> <li><input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment</li> </ul> <input checked="" type="checkbox"/> Chief Executive Officer (CEO), Chief Investment Officer (CIO), Investment Committee <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Oversight/accountability for responsible investment</li> <li><input type="checkbox"/> Implementation of responsible investment</li> <li><input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment</li> </ul> <input checked="" type="checkbox"/> Other Chief-level staff or head of department, specify Chief Investment Officer - Active Management <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Oversight/accountability for responsible investment</li> <li><input checked="" type="checkbox"/> Implementation of responsible investment</li> <li><input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment</li> </ul> <input checked="" type="checkbox"/> Portfolio managers <ul style="list-style-type: none"> <li><input type="checkbox"/> Oversight/accountability for responsible investment</li> <li><input checked="" type="checkbox"/> Implementation of responsible investment</li> <li><input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment</li> </ul> <input type="checkbox"/> ESG portfolio manager <input checked="" type="checkbox"/> Investment analysts <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Oversight/accountability for responsible investment</li> <li><input checked="" type="checkbox"/> Implementation of responsible investment</li> <li><input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment</li> </ul> <input checked="" type="checkbox"/> Dedicated responsible investment staff <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Oversight/accountability for responsible investment</li> <li><input checked="" type="checkbox"/> Implementation of responsible investment</li> </ul>			



- No oversight/accountability or implementation responsibility for responsible investment
- External managers or service providers
- Investor relations
- Other role, specify (1)
- Other role, specify (2)

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

Insight's approach to ESG activities are overseen by David Averre, Head of Credit Analysis, and supported by a responsible investment advisor, Rory Sullivan and ESG analyst, Joshua Kendall.

Joshua is responsible for implementing, monitoring and reporting on the responsible investment programme at Insight, whilst Rory guides the development, thought leadership and communication aspects of our activities.

We have an ESG Working Group with responsibility for reviewing key ESG issues. The ESG Working Group contains investment and risk professionals, with the strategic advisor and ESG analyst supporting key information through the committee for discussion and action. We inform ourselves of important developments by participating in industry initiatives, subscribing to news services and discussing issues directly with our clients, consultants and other stakeholders.

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

2

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

Insight Investment does not have a separate responsible investment team. Our philosophy and approach towards responsible investment places an emphasis on the integration of responsible investment and stewardship principles within investment decision-making. This means that responsibility for considering the ESG performance of the companies in which we invest rests principally with our team of investment analysts and decision-makers. Insight has, over a number of years, embedded ESG considerations into our standard process for investments including equities, fixed income and farmland. To assist our investment professionals in this task we have sourced data and developed proprietary toolkits, described elsewhere in this report, and provided appropriate training where necessary. The investment teams are supported in their responsible investment activities by a specialist who monitors the implementation of our responsible investment policy and acts as an advisor to the analysts and portfolio managers. Outside the investment department, representatives from our risk and communications departments assist in surveillance of regulatory developments and codes of practice, and in meeting our commitment to transparency.

<b>SG 07 CC</b>	Voluntary	Descriptive	General
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Private

<b>SG 07.1 CC</b>	Indicate the roles in your organisation, and indicate for each whether they have oversight and/or implementation responsibilities for climate-related issues.
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Private

<b>SG 07.1b CC</b>	For the management-level roles which assess and manage climate-related issues, provide further information on the structure and process involved.
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Private

<b>SG 08</b>	Voluntary	Additional Assessed	General
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<b>SG 08.1</b>	Indicate if your organisation's performance management, reward and/or personal development processes have a responsible investment element.
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Private

<b>SG 08.3</b>	Provide any additional information on your organisation's performance management, reward and/or personal development processes in relation to responsible investment.
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Private

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

- Principles for Responsible Investment

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

- Asian Corporate Governance Association
- Australian Council of Superannuation Investors
- AFIC – La Commission ESG
- BVCA – Responsible Investment Advisory Board
- CDP Climate Change

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

- CDP Forests

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

- CDP Water

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

Basic

- CFA Institute Centre for Financial Market Integrity
- Code for Responsible Investment in SA (CRISA)
- Code for Responsible Finance in the 21st Century
- Council of Institutional Investors (CII)
- Eumedion
- Extractive Industries Transparency Initiative (EITI)
- ESG Research Australia
- EVCA – Responsible Investment Roundtable
- Global Investors Governance Network (GIGN)
- Global Impact Investing Network (GIIN)
- Global Real Estate Sustainability Benchmark (GRESB)
- Green Bond Principles
- Institutional Investors Group on Climate Change (IIGCC)

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

Basic

- Interfaith Center on Corporate Responsibility (ICCR)
- International Corporate Governance Network (ICGN)
- Investor Group on Climate Change, Australia/New Zealand (IGCC)
- International Integrated Reporting Council (IIRC)
- Investor Network on Climate Risk (INCR)/CERES
- Local Authority Pension Fund Forum
- Principles for Sustainable Insurance
- Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify

Member of UKSIF

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

Basic

- Responsible Finance Principles in Inclusive Finance
- Shareholder Association for Research and Education (Share)
- United Nations Environmental Program Finance Initiative (UNEP FI)
- United Nations Global Compact
- Other collaborative organisation/initiative, specify

IASB Financial Reporting programme

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

Moderate

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

Since joining the IASB programme, Insight has benefitted from investor education sessions on changes to the IFRS accounting standards, such as IFRS 16 (valuation of leases) and IFRS 15 (revenue recognition).

We have contributed to projects on the following:

- Examining the purpose, structure and content of primary financial statements. We assisted the IASB in determining the direction of the project, and particularly how to enhance the Statement of Profit or Loss, Statement of Cash Flows, and Statement of Financial Position. In particular we pushed for a new subtotal for EBITDA and standardisation of cash flow presentation. Both these would help protect investors from management adjustments to reported figures.
- Cash disclosures. Specifically, we pushed for proper disclosure of where cash is held; restrictions on moving cash; and full details of revolving credit facilities, both drawn and undrawn. Understanding liquidity is critical to credit analysis, therefore we have been very vocal on this. The project recently concluded with no proposed changes to the existing standard, and we are therefore seeking to lobby again on the issue, and understand why the IASB decided not to proceed with any changes.

- Other collaborative organisation/initiative, specify

CFA Society UK

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

Basic

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

Insight has participated in the CFA Society UK working group seeking to implement ESG content into the IMC curriculum.

- Other collaborative organisation/initiative, specify

Investment Association (IA)

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

Basic

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

From 2018 Insight will join the IA's Sustainable and Responsible Investment Committee

Other collaborative organisation/initiative, specify

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

Yes

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

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

Description
Insight participates in a CFA UK Society working group developing an ESG/RI curriculum. The framework being developed will be used as part of IMC examinations.

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

Provided financial support for academic or industry research on responsible investment

Provided input and/or collaborated with academia on RI related work

Description
- Insight receives requests from academics or students for information on our RI activities and opportunities to interview. We generally provide the time depending on the subject.

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

Encouraged better transparency and disclosure of responsible investment practices across the investment industry

Description
- Insight discusses the importance of RI/ESG within the BNY Mellon group and encourages adoption of practices consistent with the PRI Principles - Insight has been used as a case study in the BNY CSR report

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

Spoke publicly at events and conferences to promote responsible investment

Description
- Insight speaks at several conferences on RI/ESG across Europe - Insight sponsors speaking slots - We focus on fixed income, a different perspective to most conference programmes

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

Other

Wrote and published in-house research papers on responsible investment

**Description**

- We aim to publish articles or research pieces on RI - See elsewhere our Climate Risk Model as an example of research

**Frequency of contribution**

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

Encouraged the adoption of the PRI

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

**Description**

- Yes, see responses to consultations on our website

**Frequency of contribution**

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

Wrote and published articles on responsible investment in the media

**Description**

- Our published articles on responsible investment are made available on our website. <https://www.insightinvestment.com/uk/responsible-investment/ri-literature-library/>

**Frequency of contribution**

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

A member of PRI advisory committees/ working groups, specify

**Description**

- Insight is a member of the Advisory Council on Credit Ratings

**Frequency of contribution**

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

On the Board of, or officially advising, other RI organisations (e.g. local SIFs)

Other, specify

No

**SG 10.3** Describe any additional actions and initiatives that your organisation has taken part in during the reporting year to promote responsible investment [Optional]

From 2018, Insight will participate as a member of the IA Sustainability and Responsible Investment Committee.

**SG 11** Voluntary Additional Assessed PRI 4,5,6

**SG 11.1** Indicate if your organisation - individually or in collaboration with others - conducted dialogue with public policy makers or regulators in support of responsible investment in the reporting year.

Private

SG 11.4	Provide a brief description of the main topics your organisation has engaged with public policy-makers or regulators on.		
Private			
SG 12	Mandatory	Core Assessed	PRI 4
SG 12.1	Indicate whether your organisation uses investment consultants.		
<input type="checkbox"/> Yes, we use investment consultants <input checked="" type="checkbox"/> No, we do not use investment consultants.			
SG 13	Mandatory	Descriptive	PRI 1
SG 13.1	Indicate if your organisation executes scenario analysis and/or modelling in which the risk profile of future ESG trends at portfolio level is calculated.		
<input type="checkbox"/> We execute scenario analysis which includes factors representing the investment impacts of future environmental trends <input type="checkbox"/> We execute scenario analysis which includes factors representing the investment impacts of future social trends <input type="checkbox"/> We execute scenario analysis which includes factors representing the investment impacts of future governance trends <input type="checkbox"/> We consider scenario analysis that includes factors representing the investment impacts of future climate-related risks and opportunities <input type="checkbox"/> We execute other scenario analysis, specify <input checked="" type="checkbox"/> We do not execute such scenario analysis and/or modelling			
SG 14	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1
SG 14.1	Describe the process used to identify short, medium and long-term risks and opportunities that could have a material impact on your organisation and its activities.		
Private			
SG 14.1 CC	Describe the processes used to determine which climate-related short, medium and long-term risks and opportunities could have a material impact on your organisation and its activities.		
Private			
SG 14.2	Some investment risks and opportunities arise as a result of long term trends. Indicate which of the following you act on.		
Private			
SG 14.4a CC	Please provide further details on these key metric(s) used to assess climate related risks and opportunities.		
Private			
SG 14.4b CC	Please describe in further detail your key targets.		
Private			
SG 14.5	If you selected disclosure on emissions risks, list any specific climate related disclosure tools or frameworks that you used.		
Private			
SG 14.6	Additional information [Optional]		
Private			
SG 14.7 CC	Describe your risk management processes for identifying, assessing, and managing climate-related risks.		
Private			
SG 14.8 CC	Describe your processes for prioritising climate-related risks.		
Private			
SG 14.9 CC	Do you conduct engagement activity with investee companies to encourage better disclosure and practices around climate-related risks?		
Private			
SG 14.10 CC	Describe how you use data from climate-related disclosures.		
Private			
SG 15	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1
SG 15.1	Indicate if your organisation allocates assets to, or manages, funds based on specific environmental and social themed areas.		
Private			
SG 16	Mandatory	Descriptive	General
SG 16.1	Describe how you address ESG issues for internally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.		
Asset Class	Describe what processes are in place and the outputs or outcomes achieved		

Listed equities - ESG incorporation	The bulk of our company-related investment activity is carried out in our fixed income business. This analysis is shared with equity teams when they consider making investments in these issuers. Insight's credit analysts are organised by industry sector. Analysts identify the key business drivers for each sector and analyse how these drivers will impact the financial profiles of individual companies. One of the key areas of focus is a company's management of ESG risk. Our analysts are charged with determining the financial materiality of these ESG risks, defined as the contribution these make to the probability of default of a potential investment. A failure to meet recognised standards of good governance and responsible management may represent threats to financial performance that are not adequately compensated by current expected returns. Furthermore, our view is the quality of a company's management of the environmental and social aspects of the business provides important insights into its overall quality of management. We use ESG data to assess whether and how management have adopted and implemented appropriate policies, systems and controls to manage risks, to comply with relevant codes, laws and regulations and to meet the expectations of key stakeholders.
Listed equities - engagement	For our specialist equities funds, where we hold direct ownership positions, we meet with companies to discuss investment risks and opportunities. These meetings involve a review of all salient business investment issues, including strategy, financial performance and, where relevant, environmental, social and governance factors.  Our investment focus is UK-listed entities and meetings are organised directly with companies or via company brokers.  Engagement activity is undertaken in-house by analysts and portfolio managers. This is because we consider engagement to have material financial implications and is best understood within the context of the wider investment process.  We have internal systems to track and organise our company meeting activity.
Listed equity - (proxy) voting	In the majority of Insight's current equity and multi-asset investment strategies we do not have significant direct investments in companies; most of our investments are in derivatives.  In our equity strategies, we only have direct holdings in UK-listed issuers; our voting policy and activity therefore reflects UK market requirements. We aim to vote all of our listed equity holdings.  Insight does not automatically support management or shareholder resolutions. Our voting decisions depend on a range of factors, including our existing relationship with an issuer, the business environment, and type of resolution.  We do not have mandates with segmented voting instructions. We vote on all holdings and disclose voting results on our website.
Other (2) [as defined in Organisational Overview module]	Pension schemes' liabilities typically stretch over many decades and their present value is directly linked to inflation, interest rates and the longevity of their members.  An LDI solution invests some of the pension scheme's assets to help manage these liability risks. Partially-funded instruments, such as swaps and repo, are often used to provide investment exposures without a substantial commitment of initial capital. However, they introduce bank counterparty risk.  As part of our stewardship responsibilities, Insight manages the risks associated with swaps and repo through counterparty selection and daily collateralisation, among other processes.

SG 18	Voluntary	Descriptive	General
SG 18.1	Indicate whether any specific features of your approach to responsible investment are particularly innovative.		
	Private		
SG 18.3	Additional information.		
	Private		

SG 19	Mandatory	Core Assessed	PRI 6
SG 19.1	Indicate whether your organisation proactively discloses asset class specific information. Select the frequency of the disclosure to clients/beneficiaries and the public, and provide a URL to the public information.		
	Fixed income		
	Do you disclose?		
	<input type="radio"/> We do not disclose to either clients/beneficiaries or the public. <input type="radio"/> We disclose to clients/beneficiaries only. <input checked="" type="radio"/> We disclose to the public		
	The information disclosed to clients/beneficiaries is the same		
	<input checked="" type="radio"/> Yes <input type="radio"/> No		
	<b>Disclosure to public and URL</b>		
	Disclosure to public and URL		
	<input type="radio"/> Broad approach to RI incorporation <input checked="" type="radio"/> Detailed explanation of RI incorporation strategy used		
	Annually		
	<a href="https://www.insightinvestment.com/uk/responsible-investment/insights-ri-policy/">https://www.insightinvestment.com/uk/responsible-investment/insights-ri-policy/</a>		

FI 01.1 Indicate 1) Which ESG incorporation strategy and/or combination of strategies you apply to your actively managed fixed income investments; and 2) The proportion (+/- 5%) of your total actively managed fixed income investments each strategy applies to.

SSA	Screening alone	0
	Thematic alone	0
	Integration alone	100
	Screening + integration strategies	0
	Thematic + integration strategies	0
	Screening + thematic strategies	0
	All three strategies combined	0
	No incorporation strategies applied	0
Corporate (financial)	Screening alone	0
	Thematic alone	0
	Integration alone	95
	Screening + integration strategies	5
	Thematic + integration strategies	0
	Screening + thematic strategies	0
	All three strategies combined	0
	No incorporation strategies applied	0
Corporate (non-financial)	Screening alone	0
	Thematic alone	0
	Integration alone	95
	Screening + integration strategies	5
	Thematic + integration strategies	0
	Screening + thematic strategies	0
	All three strategies combined	0
	No incorporation strategies applied	0



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

We integrate ESG factors into our investment decision-making process for fixed income corporates; however for some clients we also manage portfolios with ESG overlays (screens) and have represented this in our responses above. Typical overlays include exclusion screens, norms screens and best-in-class screens. For government and SSA debt mandates Insight applies ESG criteria to measure risk in sovereign issuers.

**FI 02** Mandatory to Report, Voluntary to Disclose Core Assessed PRI 1

**FI 02.1** Indicate which ESG factors you systematically research as part of your analysis on issuers.

Private

**FI 02.2** Indicate what format your ESG information comes in and where you typically source it

Private

**FI 02.3** Provide a brief description of the ESG information used, highlighting any differences in sources of information across your ESG incorporation strategies.

Private

**FI 02.4** Additional information. [Optional]

Private

**FI 03** Mandatory Additional Assessed PRI 1

**FI 03.1** Indicate how you ensure that your ESG research process is robust:

- Issuers are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- Issuer information and/or ESG ratings are updated regularly to ensure ESG research is accurate
- Internal audits of ESG research are undertaken in a systematic way
- ESG analysis is benchmarked for quality against other providers
- Other, specify
- None of the above

**FI 03.2** Describe how your ESG information or analysis is shared among your investment team.

- ESG information is held within a centralised database and is accessible to all investment staff
- ESG information is a standard item on all individual issuer summaries, 'tear sheets', 'dashboards' or similar documents
- Investment staff are required to discuss ESG information on issuers as a standard item during investment committee meetings
- Records capture how ESG information and research was incorporated into investment decisions
- Other, specify
- None of the above

**FI 04** Mandatory Gateway PRI 1

**FI 04.1** Indicate the type of screening you conduct.

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



FI 04.2	Describe your approach to screening for internally managed active fixed income		
<p>We outline below, some of the screens which we have implemented for clients which have specifically requested them (in addition to our integration process).</p> <ol style="list-style-type: none"> <li>1. Exclusion screens: Insight uses criteria provided by clients to prevent investments in certain business activities, such as tobacco, weapons and alcohol</li> <li>2. Best in class: Using ESG ratings to rank companies on their ESG performance, which can be used to identify leaders and tilt portfolios away from companies with the worst ESG performance and/or the highest ESG risks, and towards companies with the best ESG performance/the lowest ESG risks</li> <li>3. Norms screens: Used to manage exposure to companies with past high-profile events that suggest they do not meet globally respected standards such as the UN Global Compact and those set out by the International Labour Organisation</li> </ol>			

FI 05	Mandatory	Descriptive	PRI 1
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FI 05.1	Indicate why you conduct negative screening.						
<table border="1"> <tr> <td>Corporate (fin)</td> <td> <input checked="" type="checkbox"/> For legal reasons  <input checked="" type="checkbox"/> For non-legal reasons </td> </tr> <tr> <td>Corporate (non-fin)</td> <td> <input checked="" type="checkbox"/> For legal reasons  <input checked="" type="checkbox"/> For non-legal reasons </td> </tr> </table>				Corporate (fin)	<input checked="" type="checkbox"/> For legal reasons <input checked="" type="checkbox"/> For non-legal reasons	Corporate (non-fin)	<input checked="" type="checkbox"/> For legal reasons <input checked="" type="checkbox"/> For non-legal reasons
Corporate (fin)	<input checked="" type="checkbox"/> For legal reasons <input checked="" type="checkbox"/> For non-legal reasons						
Corporate (non-fin)	<input checked="" type="checkbox"/> For legal reasons <input checked="" type="checkbox"/> For non-legal reasons						
FI 05.2	Describe your approach to ESG-based negative screening of issuers from your investable universe.						
<p>As outlined earlier, on request, Insight applies screens on companies involved in incendiary business activity. This screening process protects the client from making investments in companies that may be prohibited by legislation or other reasons. Insight is committed to investing responsibly on behalf of our clients as we pursue their investment objectives.</p>							

FI 06	Voluntary	Additional Assessed	PRI 1
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FI 06.1	Provide examples of how ESG factors are included in your screening criteria.		
<i>Private</i>			
FI 06.2	Additional information.		
<i>Private</i>			

FI 07	Mandatory	Core Assessed	PRI 1
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FI 07.1	Indicate which systems your organisation has to ensure that fund screening criteria are not breached in fixed income investments.		
	<b>Type of screening</b>	<b>Checks</b>	
	<b>Negative/exclusionary screening?</b>	<input checked="" type="checkbox"/> Checks are performed to ensure that issuers meet screening criteria <input checked="" type="checkbox"/> We ensure that data used for the screening criteria is updated at least every 2 years. <input checked="" type="checkbox"/> Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria <input checked="" type="checkbox"/> Audits of fund holdings are undertaken regularly by internal audit or compliance functions <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above	
	<b>Positive/best-in-class screening</b>	<input checked="" type="checkbox"/> Checks are performed to ensure that issuers meet screening criteria <input checked="" type="checkbox"/> We ensure that data used for the screening criteria is updated at least every 2 years. <input checked="" type="checkbox"/> Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria <input checked="" type="checkbox"/> Audits of fund holdings are undertaken regularly by internal audit or compliance functions <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above	
	<b>Norms-based screening</b>	<input checked="" type="checkbox"/> Checks are performed to ensure that issuers meet screening criteria <input checked="" type="checkbox"/> We ensure that data used for the screening criteria is updated at least every 2 years. <input checked="" type="checkbox"/> Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria <input checked="" type="checkbox"/> Audits of fund holdings are undertaken regularly by internal audit or compliance functions <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above	

FI 11	Mandatory	Descriptive	PRI 1
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FI 11.1	Describe your approach to integrating ESG into traditional financial analysis.		
<p>Default risk is the prism through which our analysts consider every issue. A full investment analysis is required to inform an investment decision and ESG risk scores are a necessary element in assigning a credit rating that indicates the relative risk of default loss. Insight's credit analyst team is charged with determining the materiality of issues on the checklist, defined as the contribution these make to the default likelihood of a potential investment.</p>			

It is through the combination of ESG risk screening and financial analysis that Insight's extended credit risk appraisal process brings together an assessment of the financial risks associated with a company's performance with a clearly defined set of key business risks, including ESG considerations, as a part of the mainstream investment process. Insight believes that its approach exemplifies Principle 1.

Insight's credit analysts are charged with determining the materiality of ESG risks in their contribution to the overall credit risk of a potential investment. Sound corporate governance practices and adequate management of the environmental and social aspects of the business are useful indicators of the overall quality of management: a failure to meet recognised standards of good governance and responsible management will imply higher risks in a company, which may not be adequately compensated by the expected returns from an investment in it. We look for evidence that management have adopted and implemented appropriate policies, systems, and controls to comply with relevant codes, laws and regulations.

Insight transposes third-party ESG ratings into the five-point risk scale Insight uses to assess the significance of non-financial risk factors. Our ESG assessment focuses on the material risks in each sector or business. For example, we consider health and safety, and carbon emissions, as important risks for companies operating in the mining sector, but we see these as generally of lower importance for financial services companies. The exception is with corporate governance, where we consider the risks an important part of our evaluation for every type of issuer and credit quality.

#### Filling the gap

Data from third-party providers is important, but not enough. For many smaller issuers, especially emerging market and high yield companies, the availability of relevant non-financial data often lags behind that available for larger issuers. For issuers in our investment portfolios it is important that, wherever possible, we have data that enables us to make a robust assessment of companies' risk exposure and risk management. We are particularly aware that assuming that a lack of disclosure means that a company is not effectively managing the issue in question could lead to us significantly mispricing the risks associated with these issues.

Insight follows a process to generate ESG ratings where we cannot source independent ESG analysis from our market data providers:

1. Credit analysts identify companies with no ESG ratings but where the company is, or may be, issuing bonds that may be suitable for Insight's credit portfolios
2. Credit analysts work with the ESG Analyst to develop a custom ESG self-assessment tool that reflects the sector-specific risk issues relevant to the issuer
3. Company management is contacted to complete the self-assessment
4. Insight generates an ESG scorecard based on the self-assessment response
5. Insight credit analysts follow up with any risk issues identified

FI 11.2

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

#### SSA

As described previously, for government and SSA debt mandates Insight has an ESG risk model.

The model uses comparable data points from bodies such as the World Bank to compare countries' risk profiles. This includes social risks such as education, employment and gender equality plus environment factors including carbon exposure and renewable energy usage. Governance is a critical input into the model and therefore we use a number of globally-recognised standards such as corruption, rule of law and ease of doing business.

The ESG data points are each individually weighted and used to generate an overall risk score. The score is on a 1-5 scale, with 1 denoting low risk and 5 denoting high risk.

Portfolio managers including emerging markets and developed markets have access to the ESG model which they use as part of the decision-making process.

Insight has not currently used the ratings to exclude countries from our investment universe but have discussed applying the model for ESG government mandates.

#### Corporate (financial)

For fixed income corporates (financial and non-financial), incorporating ESG factors into the decision-making process is the responsibility of our analysts, with ultimate responsibility for any investment decision resting with the portfolio manager. Our credit analysts assess ESG factors as an integral component of our broader assessment of non-financial risk factors. These are a standard component of our credit risk assessment template we call the 'landmine checklist'. The performance of each analyst's recommendations is measured and monitored over the course of the year, and are an important factor in our staff appraisal process. This provides an incentive for our analysts to regularly review and update their recommendations.

To ensure that the analysts continue to take ownership of any trade recommendation we monitor on a quarterly basis, using a live portfolio, their contribution to performance. If a trade recommendation is not performing as expected, the analyst will review the issuer and circulate any change of view to the portfolio managers. In our weekly credit meetings, the credit analysts and portfolio managers have the opportunity to exchange ideas and challenge the current recommendations or positions.

It is through this combination of ESG risk screening and financial analysis that Insight's extended credit risk appraisal process brings together an assessment of the financial risks associated with a company's performance with a clearly defined set of key business risks, including ESG considerations, as a part of the mainstream investment process. Insight believes that its approach exemplifies Principle 1.

#### Corporate (non-financial)

For fixed income corporates (financial and non-financial), incorporating ESG factors into the decision-making process is the responsibility of our analysts, with ultimate responsibility for any investment decision resting with the portfolio manager. Our credit analysts assess ESG factors as an integral component of our broader assessment of non-financial risk factors. These are a standard component of our credit risk assessment template we call the 'landmine checklist'. The performance of each analyst's recommendations is measured and monitored over the course of the year, and are an important factor in our staff appraisal process. This provides an incentive for our analysts to regularly review and update their recommendations.

To ensure that the analysts continue to take ownership of any trade recommendation we monitor on a quarterly basis, using a live portfolio, their contribution to performance. If a trade recommendation is not performing as expected, the analyst will review the issuer and circulate any change of view to the portfolio managers. In our weekly credit meetings, the credit analysts and portfolio managers have the opportunity to exchange ideas and challenge the current recommendations or positions.

It is through this combination of ESG risk screening and financial analysis that Insight's extended credit risk appraisal process brings together an assessment of the financial risks associated with a company's performance with a clearly defined set of key business risks, including ESG considerations, as a part of the mainstream investment process. Insight believes that its approach exemplifies Principle 1.

#### Securitised

Our due diligence process within secured finance involves a summary of an issuer's financial performance and we apply a filter to assess management and corporate governance qualities. The governance assessment uses third-party research from MSCI, where this information is available. Our process includes a general overview of all risks and often includes discussion on environment and governance risks where this is deemed appropriate.

FI 12

Mandatory

Core Assessed

PRI 1

FI 12.1 Indicate how ESG information is typically used as part of your investment process.				
	SSA	Corporate (financial)	Corporate (non-financial)	Securitised
ESG analysis is integrated into fundamental analysis	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
ESG analysis is integrated into security weighting decisions	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ESG analysis is integrated into portfolio construction decisions	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ESG analysis is a standard part of internal credit ratings or assessment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
ESG analysis for issuers is a standard agenda item at investment committee meetings	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ESG analysis is regularly featured in internal research notes or similar	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
ESG analysis is a standard feature of ongoing portfolio monitoring	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ESG analysis features in all internal issuer summaries or similar documents	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other, specify	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

FI 13	Mandatory	Additional Assessed	PRI 1
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FI 13.1 Indicate the extent to which ESG issues are reviewed in your integration process.			
	Environment	Social	Governance
SSA	<input type="checkbox"/> Systematically <input type="checkbox"/> Occasionally <input checked="" type="checkbox"/> Not at all	<input type="checkbox"/> Systematically <input checked="" type="checkbox"/> Occasionally <input type="checkbox"/> Not at all	<input checked="" type="checkbox"/> Systematically <input type="checkbox"/> Occasionally <input type="checkbox"/> Not at all
Corporate (financial)	<input checked="" type="checkbox"/> Systematically <input type="checkbox"/> Occasionally <input type="checkbox"/> Not at all	<input checked="" type="checkbox"/> Systematically <input type="checkbox"/> Occasionally <input type="checkbox"/> Not at all	<input checked="" type="checkbox"/> Systematically <input type="checkbox"/> Occasionally <input type="checkbox"/> Not at all
Corporate (non-financial)	<input checked="" type="checkbox"/> Systematically <input type="checkbox"/> Occasionally <input type="checkbox"/> Not at all	<input checked="" type="checkbox"/> Systematically <input type="checkbox"/> Occasionally <input type="checkbox"/> Not at all	<input checked="" type="checkbox"/> Systematically <input type="checkbox"/> Occasionally <input type="checkbox"/> Not at all
Securitised	<input type="checkbox"/> Systematically <input checked="" type="checkbox"/> Occasionally <input type="checkbox"/> Not at all	<input type="checkbox"/> Systematically <input checked="" type="checkbox"/> Occasionally <input type="checkbox"/> Not at all	<input checked="" type="checkbox"/> Systematically <input type="checkbox"/> Occasionally <input type="checkbox"/> Not at all

FI 13.2 Please provide more detail on how you review E, S and G factors in your integration process.	
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SSA	<p>As described previously, for government and SSA debt mandates Insight has an ESG risk model.</p> <p>The model uses comparable data points from bodies such as the World Bank to compare countries' risk profiles. This includes social risks such as education, employment and gender equality plus environment factors including carbon exposure and renewable energy usage. Governance is a critical input into the model and therefore we use a number of globally-recognised standards such as corruption, rule of law and ease of doing business.</p> <p>The ESG data points are each individually weighted and used to generate an overall risk score. The score is on a 1-5 scale, with 1 denoting low risk and 5 denoting high risk.</p> <p>Portfolio managers including emerging markets and developed markets have access to the ESG model which they use as part of the decision-making process.</p> <p>Insight has not currently used the ratings to exclude countries from our investment universe but have discussed applying the model for ESG government mandates.</p>
Corporate (financial)	<p>As outlined, in order to evaluate the likelihood of future changes in a company's credit rating and the potential for a sudden change in credit quality, our analysts conduct detailed credit risk analysis. This involves a fundamental review of the company's financial risk, in particular its cash flow, revenue and profitability. Particular attention is paid to the scoring of key business risks using a checklist. This checklist, for so-called 'landmine risks', which we described earlier, examines important sources of risk that can lead to a sudden deterioration in credit quality or that may not be readily apparent from an examination of a company's financial performance. The key risks are scored on a scale of 1 to 5, with higher numbers indicating greater risk and scores of 5 indicating areas of significant concern. An overall ESG risk score is also assigned to each issuer within our ESG coverage.</p>

	Corporate (non-financial)		
	As outlined, in order to evaluate the likelihood of future changes in a company's credit rating and the potential for a sudden change in credit quality, our analysts conduct detailed credit risk analysis. This involves a fundamental review of the company's financial risk, in particular its cash flow, revenue and profitability. Particular attention is paid to the scoring of key business risks using a checklist. This checklist, for so-called 'landmine risks', which we described earlier, examines important sources of risk that can lead to a sudden deterioration in credit quality or that may not be readily apparent from an examination of a company's financial performance. The key risks are scored on a scale of 1 to 5, with higher numbers indicating greater risk and scores of 5 indicating areas of significant concern. An overall ESG risk score is also assigned to each issuer within our ESG coverage.		
	Securitised		
	Our due diligence process within secured finance involves a summary of an issuer's financial performance and we apply a filter to assess management and corporate governance qualities. The governance assessment uses third-party research from MSCI, where this information is available. Our process includes a general overview of all risks and often includes discussion on environment and governance risks where this is deemed appropriate.		
FI 15	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 2
FI 15.1	Indicate the proportion of your fixed income assets on which you engage. Please exclude any engagements carried out solely in your capacity as a shareholder.		
	Private		
FI 15.3	Additional information.[OPTIONAL]		
	Private		
FI 16	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1,2
FI 16.1	Indicate how you typically engage with issuers as a fixed income investor, or as both a fixed income and listed equity investor. (Please do not include engagements where you are both a bondholder and shareholder but engage as a listed equity investor only.)		
	Private		
FI 16.2	Indicate how your organisation prioritises engagements with issuers		
	Private		
FI 16.3	Indicate when your organisation conducts engagements with issuers.		
	Private		
	If 'other' has been selected, please give a description		
	Private		
FI 16.4	Indicate how your organisation conducts engagements with issuers.		
	Private		
	If 'other' has been selected, please give a description		
	Private		
FI 16.5	Indicate what your organisation conducts engagements with issuers on.		
	Private		
	If 'other' has been selected, please give a description		
	Private		
FI 16.6	Indicate how your organisation shares the outcomes of the engagements internally.		
	Private		
FI 16.7	Additional information.[OPTIONAL]		
	Private		
FI 17	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1,2
FI 17.1	Indicate if your publicly available policy documents explicitly refer to fixed income engagement separately from engagements in relation to other asset classes.		
	Private		
FI 17.3	Additional information [OPTIONAL]		
	Private		
FI 18	Mandatory to Report, Voluntary to Disclose	Additional Assessed	General
FI 18.1	Indicate whether your organisation measures how your incorporation of ESG analysis in fixed income has affected investment outcomes and/or ESG performance.		
	Private		
FI 18.2	Describe how your organisation measures how your incorporation of ESG analysis in fixed income has affected investment outcomes and/or ESG performance. [OPTIONAL]		
	Private		
FI 18.3	Additional information.[OPTIONAL]		
	Private		
FI 19	Voluntary	Descriptive	PRI 1,2

FI 19.1	Provide examples of how your incorporation of ESG analysis and/or your engagement of issuers has affected your fixed income investment outcomes during the reporting year.
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*Private*

FI 19.2	Additional information.
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*Private*

CM1 01.1	Mandatory	Core Assessed	General
CM1 01.1	Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:		
	<input type="checkbox"/> Third party assurance over selected responses from this year's PRI Transparency Report <input type="checkbox"/> Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year <input type="checkbox"/> Third party assurance or audit of the implementation of RI processes (that have been reported to the PRI this year) <input type="checkbox"/> Internal audit conducted by internal auditors of the implementation of RI processes and/or RI data that have been reported to the PRI this year) <input type="checkbox"/> Internal verification of responses before submission to the PRI (e.g. by the CEO or the board) <input checked="" type="checkbox"/> Other, specify Compliance <input type="checkbox"/> None of the above		
CM1 01.2 & 01.8	Mandatory	Descriptive	Planned assurance of this year's PRI Transparency Report
CM1 01.2	Do you plan to conduct third party assurance of this year's PRI Transparency report?		
	<input type="radio"/> Whole PRI Transparency Report will be assured <input type="radio"/> Selected data will be assured <input checked="" type="radio"/> We do not plan to assure this year's PRI Transparency report		
CM1 01.3 & 01.9	Mandatory	Descriptive	General
CM1 01.3	We undertook third party assurance on last year's PRI Transparency Report		
	<input type="radio"/> Whole PRI Transparency Report was assured last year <input type="radio"/> Selected data was assured in last year's PRI Transparency Report <input checked="" type="radio"/> We did not assure last year's PRI Transparency report, or we did not have such a report last year.		
CM1 01.4, 10-12	Mandatory	Descriptive	General
CM1 01.4	We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:		
	<input type="checkbox"/> We adhere to an RI certification or labelling scheme <input type="checkbox"/> We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report <input type="checkbox"/> ESG audit of holdings <input checked="" type="checkbox"/> Other, specify We disclose responses in full on our website and make these available to clients on request. <input type="checkbox"/> None of the above		