



LEA 02	Disclosures: Mandatory	Reason for Interaction	Principle: PRI 1, 2, 3
Individual/ internal staff engagements	<p><input checked="" type="checkbox"/> To support investment decision-making in &amp; company's interests</p> <p><input checked="" type="checkbox"/> To influence corporate transition for identifying the need to invest in low carbon technologies</p> <p><input checked="" type="checkbox"/> To engage internal staff</p> <p><input checked="" type="checkbox"/> To influence corporate transition for identifying the need to invest in low carbon technologies</p> <p><input type="checkbox"/> Other: specify</p> <p><input type="checkbox"/> We do not engage in internal staff</p>	<p><input checked="" type="checkbox"/> To support investment decision-making in &amp; company's interests</p> <p><input checked="" type="checkbox"/> To influence corporate transition for identifying the need to invest in low carbon technologies</p> <p><input checked="" type="checkbox"/> To engage internal staff</p> <p><input checked="" type="checkbox"/> To influence corporate transition for identifying the need to invest in low carbon technologies</p> <p><input type="checkbox"/> Other: specify</p> <p><input type="checkbox"/> We do not engage in internal staff</p>	
Collaborative engagements	<p><input checked="" type="checkbox"/> To support investment decision-making in &amp; company's interests</p> <p><input checked="" type="checkbox"/> To influence corporate transition for identifying the need to invest in low carbon technologies</p> <p><input checked="" type="checkbox"/> To engage internal staff</p> <p><input checked="" type="checkbox"/> To influence corporate transition for identifying the need to invest in low carbon technologies</p> <p><input type="checkbox"/> Other: specify</p> <p><input type="checkbox"/> We do not engage in collaborative engagements</p>	<p><input checked="" type="checkbox"/> To support investment decision-making in &amp; company's interests</p> <p><input checked="" type="checkbox"/> To influence corporate transition for identifying the need to invest in low carbon technologies</p> <p><input checked="" type="checkbox"/> To engage internal staff</p> <p><input checked="" type="checkbox"/> To influence corporate transition for identifying the need to invest in low carbon technologies</p> <p><input type="checkbox"/> Other: specify</p> <p><input type="checkbox"/> We do not engage in collaborative engagements</p>	
Service provider engagements	<p><input checked="" type="checkbox"/> To support investment decision-making in &amp; company's interests</p> <p><input checked="" type="checkbox"/> To influence corporate transition for identifying the need to invest in low carbon technologies</p> <p><input checked="" type="checkbox"/> To engage internal staff</p> <p><input checked="" type="checkbox"/> To influence corporate transition for identifying the need to invest in low carbon technologies</p> <p><input type="checkbox"/> Other: specify</p> <p><input type="checkbox"/> We do not engage in service providers</p>	<p><input checked="" type="checkbox"/> To support investment decision-making in &amp; company's interests</p> <p><input checked="" type="checkbox"/> To influence corporate transition for identifying the need to invest in low carbon technologies</p> <p><input checked="" type="checkbox"/> To engage internal staff</p> <p><input checked="" type="checkbox"/> To influence corporate transition for identifying the need to invest in low carbon technologies</p> <p><input type="checkbox"/> Other: specify</p> <p><input type="checkbox"/> We do not engage in service providers</p>	

# RI TRANSPARENCY REPORT

## 2018

### SEDCO Capital

## About this report

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

This report is an export of the individual Signatory organisation's response to the PRI during the 2018 reporting cycle. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information. As a result, the reports can be extensive. However, to help easily locate information, there is a **Principles index** which highlights where the information can be found and summarises the indicators that signatories complete and disclose.

## Understanding the Principles Index

The Principles Index summarises the response status for the individual indicators and modules and shows how these relate to the six [Principles for Responsible Investment](#). It can be used by stakeholders as an 'at-a-glance' summary of reported information and to identify particular themes or areas of interest.

Indicators can refer to one or more Principles. Some indicators are not specific to any Principle. These are highlighted in the 'General' column. When multiple Principles are covered across numerous indicators, in order to avoid repetition, only the main Principle covered is highlighted.

All indicators within a module are presented below. The status of indicators is shown with the following symbols:

Symbol	Status
✓	The signatory has completed all mandatory parts of this indicator
☑	The signatory has completed some parts of this indicator
🔒	This indicator was not relevant for this signatory
-	The signatory did not complete any part of this indicator
Ⓜ	The signatory has flagged this indicator for internal review

Within the table, indicators marked in blue are mandatory to complete. Indicators marked in grey are voluntary to complete.

# Principles Index

Organisational Overview				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
OO TG		-	n/a							
OO 01	Signatory category and services	✓	Public							✓
OO 02	Headquarters and operational countries	✓	Public							✓
OO 03	Subsidiaries that are separate PRI signatories	✓	Public							✓
OO 04	Reporting year and AUM	✓	Public							✓
OO 05	Breakdown of AUM by asset class	✓	Asset mix disclosed in OO 06							✓
OO 06	How would you like to disclose your asset class mix	✓	Public							✓
OO 07	Fixed income AUM breakdown	✓	Private							✓
OO 08	Segregated mandates or pooled funds	✓	Private							✓
OO 09	Breakdown of AUM by market	✓	Private							✓
OO 10	RI activities for listed equities	✓	Public							✓
OO 11	RI activities in other asset classes	✓	Public							✓
OO 12	Modules and sections required to complete	✓	Public							✓
OO LE 01	Breakdown by passive, quantitative, fundamental and other active strategies	✓	Private							✓
OO LE 02	Reporting on strategies that are <10% of actively managed listed equities	🔒	n/a							✓
OO FI 01	Breakdown by passive, active strategies	✓	Private							✓
OO FI 02	Option to report on <10% assets	🔒	n/a							✓
OO FI 03	Breakdown by market and credit quality	-	n/a							✓
OO SAM 01	Breakdown by passive, quantitative, fundamental and other active strategies	✓	Private							✓
OO PE 01	Breakdown of investments by strategy	✓	Private							✓
OO PE 02	Typical level of ownership	✓	Private							✓
OO PR 01	Breakdown of investments	✓	Public							✓
OO PR 02	Breakdown of assets by management	✓	Public							✓
OO PR 03	Largest property types	✓	Private							✓
OO INF 01	Breakdown of investments	🔒	n/a							✓
OO INF 02	Breakdown of assets by management	🔒	n/a							✓
OO INF 03	Largest infrastructure	🔒	n/a							✓
OO End	Module confirmation page	✓	-							

Strategy and Governance				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
SG 01	RI policy and coverage	✓	Public							✓
SG 02	Publicly available RI policy or guidance documents	✓	Public							✓
SG 03	Conflicts of interest	✓	Public							✓
SG 04	Identifying incidents occurring within portfolios	✓	Private							✓
SG 05	RI goals and objectives	✓	Public							✓
SG 06	Main goals/objectives this year	✓	Private							✓
SG 07	RI roles and responsibilities	✓	Public							✓
SG 07 CC	Climate-issues roles and responsibilities	🔒	n/a							✓
SG 08	RI in performance management, reward and/or personal development	✓	Private							✓
SG 09	Collaborative organisations / initiatives	✓	Public				✓	✓		
SG 09.2	Assets managed by PRI signatories	✓	Private	✓						
SG 10	Promoting RI independently	✓	Public				✓			
SG 11	Dialogue with public policy makers or standard setters	✓	Private				✓	✓	✓	
SG 12	Role of investment consultants/fiduciary managers	✓	Public				✓			
SG 13	ESG issues in strategic asset allocation	✓	Public	✓						
SG 14	Long term investment risks and opportunity	✓	Public	✓						
SG 15	Allocation of assets to environmental and social themed areas	✓	Private	✓						
SG 16	ESG issues for internally managed assets not reported in framework	✓	Public							✓
SG 17	ESG issues for externally managed assets not reported in framework	✓	Public							✓
SG 18	Innovative features of approach to RI	✓	Public							✓
SG 19	Communication	✓	Public							✓
SG End	Module confirmation page	✓	-							

Indirect – Manager Selection, Appointment and Monitoring				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
SAM 01	ESG incorporation strategies	✓	Public	✓						
SAM 02	Selection processes (LE and FI)	✓	Public	✓						
SAM 03	Evaluating engagement and voting practices in manager selection (listed equity/fixed income)	✓	Public		✓					
SAM 04	Appointment processes (listed equity/fixed income)	✓	Public	✓						
SAM 05	Monitoring processes (listed equity/fixed income)	✓	Public	✓						
SAM 06	Monitoring on active ownership (listed equity/fixed income)	✓	Public	✓						
SAM 07	Percentage of (proxy) votes	✓	Public		✓					
SAM 08	Percentage of externally managed assets managed by PRI signatories	✓	Private	✓						
SAM 09	Examples of ESG issues in selection, appointment and monitoring processes	✓	Public	✓						✓
SAM End	Module confirmation page	✓	-							

Direct - Listed Equity Incorporation				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
LEI 01	Percentage of each incorporation strategy	✓	Public	✓						
LEI 02	Type of ESG information used in investment decision	✓	Private	✓						
LEI 03	Information from engagement and/or voting used in investment decision-making	✓	Private	✓						
LEI 04	Types of screening applied	✓	Public	✓						
LEI 05	Processes to ensure screening is based on robust analysis	✓	Public	✓						
LEI 06	Processes to ensure fund criteria are not breached	✓	Private	✓						
LEI 07	Types of sustainability thematic funds/mandates	🔒	n/a	✓						
LEI 08	Review ESG issues while researching companies/sectors	✓	Public	✓						
LEI 09	Processes to ensure integration is based on robust analysis	✓	Private	✓						
LEI 10	Aspects of analysis ESG information is integrated into	✓	Private	✓						
LEI 11	ESG issues in index construction	🔒	n/a	✓						
LEI 12	How ESG incorporation has influenced portfolio composition	✓	Private	✓						
LEI 13	Measurement of financial and ESG outcomes of ESG incorporation	✓	Private	✓						
LEI 14	Examples of ESG issues that affected your investment view / performance	✓	Private	✓						
LEI End	Module confirmation page	✓	-							

Direct - Listed Equity Active Ownership				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
LEA 01	Description of approach to engagement	🔒	n/a		✓					
LEA 02	Reasoning for interaction on ESG issues	🔒	n/a	✓	✓	✓				
LEA 03	Process for identifying and prioritising engagement activities	🔒	n/a		✓					
LEA 04	Objectives for engagement activities	🔒	n/a		✓					
LEA 05	Process for identifying and prioritising collaborative engagement	🔒	n/a		✓					
LEA 06	Objectives for engagement activities	🔒	n/a		✓					
LEA 07	Role in engagement process	🔒	n/a		✓		✓			
LEA 08	Monitor / discuss service provider information	🔒	n/a		✓				✓	
LEA 09	Share insights from engagements with internal/external managers	🔒	n/a	✓	✓					
LEA 10	Tracking number of engagements	🔒	n/a		✓					
LEA 11	Number of companies engaged with, intensity of engagement and effort	🔒	n/a		✓					
LEA 12	Engagement methods	🔒	n/a		✓					
LEA 13	Companies changing practices / behaviour following engagement	🔒	n/a		✓					
LEA 14	Examples of ESG engagements	🔒	n/a		✓					
LEA 15	Voting policy & approach	✓	Public	✓	✓	✓				
LEA 16	Typical approach to (proxy) voting decisions	✓	Public		✓					
LEA 17	Percentage of voting recommendations reviewed	🔒	n/a		✓					
LEA 18	Confirmation of votes	-	n/a		✓					
LEA 19	Securities lending programme	✓	Private		✓					
LEA 20	Informing companies of the rationale of abstaining/voting against management	✓	Public		✓					
LEA 21	Percentage of (proxy) votes cast	✓	Public		✓					
LEA 22	Proportion of ballot items that were for/against/abstentions	✓	Public		✓					
LEA 23	Shareholder resolutions	✓	Private		✓					
LEA 24	Examples of (proxy) voting activities	-	n/a		✓					
LEA End	Module confirmation page	✓	-							

Direct – Private Equity				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
PE 01	Description of approach to RI	✓	Public	✓					✓	
PE 02	Investment guidelines and RI	✓	Public		✓					
PE 03	Fund placement documents and RI	✓	Public	✓			✓		✓	
PE 04	Formal commitments to RI	✓	Private				✓			
PE 05	Incorporating ESG issues when selecting investments	✓	Public	✓						
PE 06	Types of ESG information considered in investment selection	✓	Public	✓		✓				
PE 07	Encouraging improvements in investees	✓	Private	✓	✓					
PE 08	ESG issues impact in selection process	✓	Private	✓						
PE 09	Proportion of companies monitored on their ESG performance	✓	Public		✓					
PE 10	Proportion of portfolio companies with sustainability policy	✓	Public		✓					
PE 11	Actions taken by portfolio companies to incorporate ESG issues into operations	✓	Private		✓					
PE 12	Type and frequency of reports received from portfolio companies	✓	Private		✓	✓				
PE 13	Disclosure of ESG issues in pre-exit	✓	Private		✓					
PE 14	ESG issues affected financial/ESG performance	✓	Private	✓	✓					
PE 15	Examples of ESG issues that affected your PE investments	✓	Private	✓	✓					
PE 16	Approach to disclosing ESG incidents	✓	Private						✓	
PE End	Module confirmation page	✓	-							

Direct - Property				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
PR 01	Responsible Property Investment (RPI) policy	✓	Public	✓					✓	
PR 02	Fund placement documents and RI	✓	Public	✓			✓		✓	
PR 03	Formal commitments to RI	✓	Private				✓			
PR 04	Incorporating ESG issues when selecting investments	✓	Public	✓						
PR 05	Types of ESG information considered in investment selection	✓	Private	✓		✓				
PR 06	ESG issues impact in selection process	✓	Public	✓						
PR 07	ESG issues in selection, appointment and monitoring of third-party property managers	✓	Public				✓			
PR 08	ESG issues in post-investment activities	✓	Public		✓					
PR 09	Proportion of assets with ESG targets that were set and monitored	✓	Public		✓	✓				
PR 10	Certification schemes, ratings and benchmarks	✓	Private		✓					
PR 11	Proportion of developments and refurbishments where ESG issues were considered	✓	Public		✓					
PR 12	Proportion of property occupiers that were engaged with	✓	Public		✓					
PR 13	Proportion of green leases or MOUs referencing ESG issues	✓	Public		✓					
PR 14	Proportion of assets engaged with on community issues	✓	Private		✓					
PR 15	ESG issues affected financial/ESG performance	✓	Private	✓	✓					
PR 16	Examples of ESG issues that affected your property investments	✓	Private	✓		✓				
PR End	Module confirmation page	✓	-							

Assurance				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
CM 1 01.1	Assurance, verification, or review	✓	Public							✓
CM 1 01.2 & 01.8	Assurance of this year's PRI data	✓	Public							
CM 1 01.3 & 01.9	Assurance of last year's PRI data	✓	Public							✓
CM 1 01.4, 10- 12	Other confidence building measures	✓	Public							✓
CM 1 01.5	External assurance	🔒	n/a							✓
CM 1 01.6	Assurance or internal audit	🔒	n/a							✓
CM 1 01.7	Internal verification	✓	Public							✓
CM 1 01 End	Module confirmation page	✓	-							

# SEDCO Capital

## Reported Information

### Public version

### Organisational Overview

## PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

## Basic information

OO 01

Mandatory

Public

Gateway/Peering

General

OO 01.1

Select the services and funds you offer

Fund management

% of assets under management (AUM) in ranges

- <10%
- 10-50%
- >50%

Fund of funds, manager of managers, sub-advised products

% of assets under management (AUM) in ranges

- <10%
- 10-50%
- >50%

Other, specify

Further options for investment managers (may be selected in addition to the above)

- Execution and advisory services
- Hedge funds
- Fund of hedge funds

OO 02

Mandatory

Public

Peering

General

OO 02.1

Select the location of your organisation's headquarters.

Saudi Arabia

OO 02.2

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

- 1
- 2-5
- 6-10
- >10

**OO 02.3** Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).

FTE

74

**OO 03** **Mandatory** **Public** **Descriptive** **General**

**OO 03.1** Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.

- Yes
- No

**OO 04** **Mandatory** **Public** **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.

	trillions	billions	millions	thousands	hundreds
Total AUM		5	076	000	000
Currency	USD				
Assets in USD		5	076	000	000

**OO 06** **Mandatory** **Public** **Descriptive** **General**

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

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

- as percentage breakdown
- as broad ranges

	Internally managed (%)	Externally managed (%)
Listed equity	<10%	10-50%
Fixed income	<10%	<10%
Private equity	<10%	10-50%

Property	10-50%	<10%
Infrastructure	0	0
Commodities	0	0
Hedge funds	0	0
Forestry	0	0
Farmland	0	0
Inclusive finance	0	0
Cash	<10%	0
Other (1), specify	0	<10%
Other (2), specify	0	0

	'Other (1)' specified
--	-----------------------

Leasing

<b>OO 06.2</b>	Publish asset class mix as per attached image [Optional].
----------------	---

### Asset class implementation gateway indicators

<b>OO 10</b>	<b>Mandatory</b>	<b>Public</b>	<b>Gateway</b>	<b>General</b>
--------------	------------------	---------------	----------------	----------------

<b>OO 10.1</b>	Select the active ownership activities your organisation implemented in the reporting year.
----------------	---

	Listed equity – engagement
--	----------------------------

- We engage with companies on ESG factors via our staff, collaborations or service providers.
- We require our external managers to engage with companies on ESG factors on our behalf.
- We do not engage directly and do not require external managers to engage with companies on ESG factors.

	Listed equity – voting
--	------------------------

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

#### Fixed income SSA – engagement

- We engage with companies on ESG factors via our staff, collaborations or service providers.
- We require our external managers to engage with companies on ESG factors on our behalf.
- 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

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

#### Fixed income Corporate (non-financial) – engagement

- We engage with companies on ESG factors via our staff, collaborations or service providers.
- We require our external managers to engage with companies on ESG factors on our behalf.
- 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

Public

Gateway

General

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

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

#### Fixed income - corporate (financial)

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

#### Private equity

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

#### Property

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

Cash

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

Asset class	ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes
Listed equity	<p data-bbox="560 342 1474 423">Listed equity - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p data-bbox="560 439 1286 465"><input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p data-bbox="560 481 1323 508"><input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process</p> <p data-bbox="560 524 1302 551"><input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p data-bbox="560 566 935 593"><input type="checkbox"/> We do not do ESG incorporation</p>
Fixed income - SSA	<p data-bbox="560 656 1474 736">Fixed income - SSA - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p data-bbox="560 752 1286 779"><input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p data-bbox="560 795 1323 822"><input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process</p> <p data-bbox="560 837 1302 864"><input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p data-bbox="560 880 935 907"><input type="checkbox"/> We do not do ESG incorporation</p>
Fixed income - corporate (financial)	<p data-bbox="560 969 1474 1072">Fixed income - corporate (financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p data-bbox="560 1088 1286 1115"><input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p data-bbox="560 1131 1323 1158"><input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process</p> <p data-bbox="560 1173 1302 1200"><input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p data-bbox="560 1216 935 1243"><input type="checkbox"/> We do not do ESG incorporation</p>
Fixed income - corporate (non-financial)	<p data-bbox="560 1305 1474 1408">Fixed income - corporate (non-financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p data-bbox="560 1424 1286 1451"><input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p data-bbox="560 1467 1323 1494"><input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process</p> <p data-bbox="560 1509 1302 1536"><input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p data-bbox="560 1552 935 1579"><input type="checkbox"/> We do not do ESG incorporation</p>
Private equity	<p data-bbox="560 1641 1474 1722">Private equity - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p data-bbox="560 1738 1286 1765"><input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p data-bbox="560 1780 1323 1807"><input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process</p> <p data-bbox="560 1823 1302 1850"><input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p data-bbox="560 1865 935 1892"><input type="checkbox"/> We do not do ESG incorporation</p>
Property	

	<p><b>Property - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</b></p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p><input type="checkbox"/> We do not do ESG incorporation</p>
Other (1)	<p><b>Other (1) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</b></p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process</p> <p><input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p><input type="checkbox"/> We do not do ESG incorporation</p>

**OO 11.4** Provide a brief description of how your organisation includes responsible investment considerations in your investment manager selection, appointment and monitoring processes.

The manager selection criteria apply for liquid assets, private equity and real estate.

SC includes ESG assessment both in the initial due diligence as well as the ongoing monitoring of its external investment managers. External investment managers are expected to:

Provide details of the manager's ESG policies.

Disclose to SC

- How they integrate ESG into their investment decisions and the competence and drivers for their staff to incorporate ESG considerations.
- The manager's ESG activities, including research, voting and engagement. SC expects that fund managers will document and be able to provide meaningful data in relation to the number of engagements, proportion that relate to ESG issues and number of successful engagements with companies.

SC may assess the following aspects:

- If the manager has a structured approach to managing ESG risks and opportunities.
- Transparency: access to ESG information, scope of information, quality of ESG information.
- Ability to mitigate ESG risks: risk exposure assessment, adherence to the principles of the UN Global Compact, ESG policies and implementation, ESG characteristics, presence of quantified and dated targets, ESG performance, and trend.
- The news flow: controversial news, reputational risk.

SC aims to analyze the investment process of external managers from an ESG perspective in the initial due diligence. SC promotes responsible investment to existing managers that do not yet adhere to responsible investment principles. SC annually reviews the manager's responsible investment process.

This analysis is documented in the investment research and due diligence memos. Investment decisions should consider this documentation. Regular updates on ESG should be documented in Manager Discussion Summaries.

OO 12	Mandatory	Public	Gateway	General
-------	-----------	--------	---------	---------

**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**

- Organisational Overview
- Strategy and Governance

**RI implementation directly or via service providers**

## Direct - Listed Equity incorporation

- Listed Equity incorporation

## Direct - Listed Equity active ownership

- (Proxy) voting

## Direct - Fixed Income

- Fixed income - Corporate (financial)

## Direct - Other asset classes with dedicated modules

- Private Equity
- Property

**RI implementation via external managers**

## Indirect - Selection, Appointment and Monitoring of External Managers

- Listed Equities
- Fixed income - SSA
- Fixed income - Corporate (financial)
- Fixed income - Corporate (non-financial)
- Private Equity
- Property

**Closing module**

- Closing module

**Peering questions**

OO PR 01	Mandatory to Report Voluntary to Disclose	Public	Descriptive	General
----------	---	--------	-------------	---------

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

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

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

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

- >50%
- 10 – 50%
- <10%
- 0%

OO PR 02	Mandatory to Report Voluntary to Disclose	Public	Gateway	General
----------	---	--------	---------	---------

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

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

# SEDCO Capital

## Reported Information

### Public version

### Strategy and Governance

## PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

## Investment policy

SG 01

Mandatory

Public

Core Assessed

General

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

SG 01.1

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

Yes

SG 01.2

Indicate the components/types and coverage of your policy.

Select all that apply

Policy components/types	Coverage by AUM
<input checked="" type="checkbox"/> Policy setting out your overall approach <input checked="" type="checkbox"/> Formalised guidelines on environmental factors <input checked="" type="checkbox"/> Formalised guidelines on social factors <input checked="" type="checkbox"/> Formalised guidelines on corporate governance factors <input checked="" type="checkbox"/> Asset class-specific RI guidelines <input checked="" 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="radio"/> Applicable policies cover all AUM <input type="radio"/> Applicable policies cover a majority of AUM <input type="radio"/> Applicable policies cover a minority of AUM

SG 01.3

Indicate if the investment policy covers any of the following

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

SEDCO Capital (SC) has become the first Shariah-compliant signatory of the Principles for Responsible Investment (PRI). SC stresses the similarities of Shariah-compliance and responsible investing. For SC, responsible investing and environmental, social and (corporate) governance aspects are an integral part of its activities. SC aims to be a prudent investor, who avoids undue risks and seeks sustainable investments with strong governance that are in compliance with relevant regulation. SC believes that an ESG overlay can lead to long-term rewards in terms of risk reduction and potentially higher returns. SC aims to use the ESG assessment to incorporate non-financial information and to identify risk factors. SC regards ESG investing as an investment decision making process that considers the environmental, social and corporate governance risks associated with the companies in which it invests and employs strategies to evaluate their impact within the context of financial analysis. This process is a sound complement to the traditional investment analysis focused on financial data. Furthermore, SC intends for its investments to contribute to sustainable development - meeting the needs of the present without compromising the ability of future generations to meet their own needs.

**SG 01.5**

Provide a brief description of the key elements, any variations or exceptions to your investment policy that covers your responsible investment approach. [Optional]

SC incorporates responsible investment approaches in all its investment activities. There are no exceptions in SC's responsible investment approach relative to its overall investment policy. Islamic finance and responsible investment are well aligned. SC considers Shariah-compliant investing as a sub-set of responsible investing. Therefore, SC applies the same investment guidelines and aims to restrict non-permissible activities which include the following:

- The manufacture and/or sale/distribution of alcohol, tobacco and pornographic productions.
- Restaurant or hotel/motel businesses, except those not selling alcohol.
- Operators of gambling casinos or manufacturers of gambling machines.
- The manufacture of military defense equipment or weaponry.

No

Your responses to this indicator will be used to determine if you meet the minimum requirements of being a PRI signatory introduced for the first time in 2018. Signatories have until 2020 to meet these requirements.

You can find out more information on the PRI website.

There are two minimum requirements for this indicator SG 01.1 and SG 01.2:

- A policy, or similar document, that: Sets out your overall approach to responsible investment; or
- Formalised guidelines on environmental factors; or
- Formalised guidelines on social factors; or
- Formalised guidelines on governance factors.
- 

The PRI recognises that RI "policies" can take many different forms and can have a variety of titles. Please see the explanatory notes for this indicator to see further explanation of this and further guidance.

- This policy/document should cover more than 50% of your AUM

If you have any questions or need support please contact [reporting@unpri.org](mailto:reporting@unpri.org) or call on + 44 (0) 203 714 3187.

I confirm that I have read and understood this information

I confirm that I have read and understood this information

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

<b>SG 02.1</b>	Indicate which of your investment policy documents (if any) are publicly available. Provide a URL and an attachment of the document.
----------------	--

- Policy setting out your overall approach
- Formalised guidelines on environmental factors
- Formalised guidelines on social factors
- Formalised guidelines on corporate governance factors
- Asset class-specific RI guidelines
- Sector specific RI guidelines
- Screening / exclusions policy
- Engagement policy
- (Proxy) voting policy
- We do not publicly disclose our investment policy documents

<b>SG 02.2</b>	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
--	----------------

- URL

	URL
--	-----

<http://sedccapital.com/philosophy>

- Attachment
- Your investment objectives that take ESG factors/real economy influence into account
- Governance structure of organisational ESG responsibilities
- ESG incorporation approaches

	URL/Attachment
--	----------------

- URL

URL

<http://sedccapital.com/philosophy>

- Attachment
- Active ownership approaches
- Reporting

URL/Attachment

- URL

URL

<http://sedccapital.com/philosophy>

- Attachment
- Climate-related issues
- 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
- No

<b>SG 03</b>	<b>Mandatory</b>	<b>Public</b>	<b>Core Assessed</b>	<b>General</b>
--------------	------------------	---------------	----------------------	----------------

**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.

SC has a Conflict of Interest Policy which covers all aspects of the investment process, governance, guidelines on handling of conflicts of interests and escalation and reporting.

- No

## Objectives and strategies

<b>SG 05</b>	<b>Mandatory</b>	<b>Public</b>	<b>Gateway/Core Assessed</b>	<b>General</b>
--------------	------------------	---------------	------------------------------	----------------

**SG 05.1**

Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad-hoc basis
- It is not set/reviewed

## Governance and human resources

**SG 07****Mandatory****Public****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

- Board members or trustees
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Chief Executive Officer (CEO), Chief Investment Officer (CIO), Investment Committee
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Other Chief-level staff or head of department, specify  
Chief Risk Officer (CRO)

- Oversight/accountability for responsible investment
- Implementation of responsible investment
- No oversight/accountability or implementation responsibility for responsible investment
- Portfolio managers
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- ESG portfolio manager
- Investment analysts
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Dedicated responsible investment staff
- External managers or service providers
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Investor relations
- Other role, specify (1)

	Other description (1)
--	-----------------------

**Heads of asset classes**

- Oversight/accountability for responsible investment
- Implementation of responsible investment
- No oversight/accountability or implementation responsibility for responsible investment
- Other role, specify (2)

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

The Board has the overall oversight of the program. The CEO is the sponsor and driver of SC's responsible investment activities. CEO drives many key responsible investment initiatives.

The CRO oversees SC's responsible investment activities and leads the implementation of the responsible investment program for SC as well as the ongoing enhancement.

The heads of asset classes, portfolio managers and investment analysts are responsible for the consideration of responsible investment aspects in the normal investment process within their area of responsibility. The heads of asset classes support the reporting activities.

<b>SG 07.3</b>	Indicate the number of dedicated responsible investment staff your organisation has.
----------------	--

	Number
--	--------

0

Your responses to this indicator will be used to determine if you meet the minimum requirements of being a PRI signatory introduced for the first time in 2018. Signatories have until 2020 to meet these requirements.

You can find out more information on the PRI website.

There are two minimum requirements for this indicator SG 07.1:

- A role implementing responsible investment: Individuals with implementation roles are those charged with implementing specific aspects of the organisation's responsible investment practices, for example, conducting ESG-related research, incorporating ESG issues into investment strategies, voting shareholdings, engaging with companies and policy makers;
- This can be an internal staff or an external role;
- They do not have to be a dedicated RI/ESG investment staff (captured in 07.3); and
- They do not have to be allocating the majority of their time to RI/ESG activities.
- 
- Senior level oversight and accountability for RI implementation: Individuals with oversight roles are those with management or governance responsibility for ensuring that the organisation implements its policies, and achieves its objectives and targets in relation to responsible investment performance; and
- "Senior level" includes the roles: Chief level staff, head of department, CEO, CIO, Investment Committee and Board members or trustees.
- 

If you have any questions or need support please contact [reporting@unpri.org](mailto:reporting@unpri.org) or call on + 44 (0) 203 714 3187.

I confirm that I have read and understood this information

I confirm that I have read and understood this information

## Promoting responsible investment

SG 09	Mandatory	Public	Core Assessed	PRI 4,5
-------	-----------	--------	---------------	---------

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

**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.

### Select all that apply

- Principles for Responsible Investment

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

- Basic
- Moderate
- Advanced
  
- Asian Corporate Governance Association
- Australian Council of Superannuation Investors
- AFIC – La Commission ESG
- BVCA – Responsible Investment Advisory Board
- CDP Climate Change
- CDP Forests
- CDP Water
- 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)
- 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
- 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  
**Arab Bankers Association of North America (ABANA)**

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

- Basic
- Moderate
- Advanced

Other collaborative organisation/initiative, specify

Responsible Finance Institute (RFI)

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

- Basic
- Moderate
- Advanced

Other collaborative organisation/initiative, specify

Other collaborative organisation/initiative, specify

SG 10

Mandatory

Public

Core Assessed

PRI 4

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

Training on Responsible Investments

Frequency of contribution

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

Provided financial support for academic or industry research on responsible investment

Description

Active involvement on the Board of Trustees and financial contribution to RFI Foundation

#### Frequency of contribution

- Quarterly or more frequently
  - Biannually
  - Annually
  - Less frequently than annually
  - Ad hoc
  - Other
- Provided input and/or collaborated with academia on RI related work
- Encouraged better transparency and disclosure of responsible investment practices across the investment industry
- Spoke publicly at events and conferences to promote responsible investment

#### Description

Conference presentations on responsible investment topics during 2017:

- Responsible Finance and Investment Summit 2017, Zurich
- IFN Asia, Kuala Lumpur
- Fund Forum Middle East, Dubai
- Global Ethical Finance Forum, Edinburgh
- Islamic Finance Forum London

#### Frequency of contribution

- Quarterly or more frequently
  - Biannually
  - Annually
  - Less frequently than annually
  - Ad hoc
  - Other
- Wrote and published in-house research papers on responsible investment
- Encouraged the adoption of the PRI

#### Description

At various panels and presentations of industry conferences.

Frequency of contribution

- Quarterly or more frequently
  - Biannually
  - Annually
  - Less frequently than annually
  - Ad hoc
  - Other
- Responded to RI related consultations by non-governmental organisations (OECD, FSB etc.)
- Wrote and published articles on responsible investment in the media

Description

How Can Responsible Investors Benefit from Islamic Criteria?  
[https://papers.ssrn.com/sol3/papers2.cfm?abstract\\_id=2918849](https://papers.ssrn.com/sol3/papers2.cfm?abstract_id=2918849)

Articles in industry publications, e.g. Thomson Reuters Global Islamic Asset Management Outlook

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

Description

RFI Foundation

Frequency of contribution

- Quarterly or more frequently
  - Biannually
  - Annually
  - Less frequently than annually
  - Ad hoc
  - Other
- Other, specify
- No

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

## Outsourcing to fiduciary managers and investment consultants

<b>SG 12</b>	<b>Mandatory</b>	<b>Public</b>	<b>Core Assessed</b>	<b>PRI 4</b>
--------------	------------------	---------------	----------------------	--------------

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

<b>SG 12.1</b>	Indicate whether your organisation uses investment consultants.
----------------	---

- Yes, we use investment consultants
- No, we do not use investment consultants.

## ESG issues in asset allocation

<b>SG 13</b>	<b>Mandatory</b>	<b>Public</b>	<b>Descriptive</b>	<b>PRI 1</b>
--------------	------------------	---------------	--------------------	--------------

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

<b>SG 13.1</b>	Indicate if your organisation executes scenario analysis and/or modelling in which the risk profile of future ESG trends at portfolio level is calculated.
----------------	--

- We execute scenario analysis which includes factors representing the investment impacts of future environmental trends
- We execute scenario analysis which includes factors representing the investment impacts of future social trends
- We execute scenario analysis which includes factors representing the investment impacts of future governance trends
- We consider scenario analysis that includes factors representing the investment impacts of future climate-related risks and opportunities

	Is this scenario analysis based on a 2°C or lower scenario?
--	---

- Yes
- No
- We execute other scenario analysis, specify
- We do not execute such scenario analysis and/or modelling

<b>SG 13.2</b>	Indicate if your organisation considers ESG issues in strategic asset allocation and/or allocation of assets between sectors or geographic markets.
----------------	---

**We do the following**

- Allocation between asset classes
- Determining fixed income duration
- Allocation of assets between geographic markets
- Sector weightings
- Other, specify
- We do not consider ESG issues in strategic asset allocation

<b>SG 14</b>	<b>Mandatory to Report Voluntary to Disclose</b>	<b>Public</b>	<b>Additional Assessed</b>	<b>PRI 1</b>
--------------	--	---------------	----------------------------	--------------

**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.

For all investment and operational/business-related risks at all horizons, SC follows an iterative process of 1) risk identification, 2) assessment, 3) management and 4) reporting.

**SG 14.2** Some investment risks and opportunities arise as a result of long term trends. Indicate which of the following you act on.

- Changing demographics
- Climate change and related issues

**SG 14.3** Indicate which of the following activities you have undertaken to respond to climate change risk and opportunity

- Established a climate change sensitive or climate change integrated asset allocation strategy
- Targeted low carbon or climate resilient investments
- Reduced portfolio exposure to emissions intensive or fossil fuel holdings
- Used emissions data or analysis to inform investment decision making
- Sought climate change integration by companies
- Sought climate supportive policy from governments
- Other, specify
- None of the above

**SG 14.4**

Indicate which of the following tools you use to manage emissions risks and opportunities

- Scenario analysis
  - Disclosure on emissions risk to clients/trustees/management/beneficiaries
  - Climate-related targets
  - Encourage internal and/or external portfolio managers to monitor emissions risk
  - Emissions risk monitoring and reporting are formalised into contracts when appointing managers
  - Weighted average carbon intensity
  - Carbon footprint (scope 1 and 2)
  - Portfolio carbon footprint
  - Total carbon emissions
  - Carbon intensity
  - Exposure to carbon-related assets
  - Other emissions metrics
  - Other, specify
  - None of the above
- Resource scarcity
  - Technology developments
  - Other, specify(1)
  - Other, specify(2)
  - None of the above

**Asset class implementation not reported in other modules**

SG 16	Mandatory	Public	Descriptive	General
<b>Asset Class</b>	<b>Describe what processes are in place and the outputs or outcomes achieved</b>			
Fixed income - Corporate (financial)	<p>SEDCO Capital (SC) applies a set of screens and exclusions that are in-line with its Shariah-compliant investment philosophy.</p> <p>SC analyzes sukuk, murabaha and other income assets from an ESG perspective. The ESG review is part of the issuer review for financial and qualitative risks and considerations. SC's ESG assessment is an integral part of the investment analysis of issuers and other specific instruments. The results of the ESG analysis are discussed between investment analyst and fund manager.</p>			
Cash	<p>SEDCO Capital (SC) applies a set of screens and exclusions that are in-line with its Shariah-compliant investment philosophy.</p>			

**SG 16.2**

Additional information [Optional].

While the incorporation of ESG is a continuous process and may not be reflected in all activities, SEDCO Capital (SC) strives to make responsible investment decisions whilst having regard to its overriding duty of protecting the interests of its clients.

SC applies the following investment restrictions across all asset classes. SC considers Shariah-compliant investing as a sub-set of responsible investing. Islamic finance and responsible investment are well aligned. Therefore, SC applies the same investment guidelines and aims to restrict non-permissible activities which include: (i) The manufacture and/or sale/distribution of alcohol, tobacco and pornographic productions. (ii) Restaurant or hotel/motel businesses, except those not selling alcohol. (iii) Operators of gambling casinos or manufacturers of gambling machines. (iv) The manufacture of military defense equipment or weaponry.

Besides the exclusions, which are defined in SC's Shariah Manual among other investment restrictions, SC does not make a priori exclusions in the sense of refusing to invest in companies with predefined activities deemed unethical.

SC integrates ESG issues into traditional financial analysis. SC's investment process should substantially reduce the probability that it will make an investment that is ethically questionable or that exposes investors to high risks resulting from environmental, social and governance criteria. Thus, investments with significant weaknesses and risks on the basis of ESG criteria should be excluded from the investment universe - on a case by case basis.

SG 17	Mandatory	Public	Descriptive	General
<b>SG 17.1</b>	Describe how you address ESG issues for externally 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
Fixed income - SSA	<p>SC includes ESG assessment both in the initial due diligence as well as the ongoing monitoring of its external investment managers. External investment managers are expected to provide details of their ESG policies and disclose to SC:</p> <ul style="list-style-type: none"> <li>- How they integrate ESG into their investment decisions and the competence and drivers for their staff to incorporate ESG considerations.</li> <li>- Their ESG activities, including research, voting and engagement.</li> <li>- SC expects that fund managers will document and be able to provide meaningful data in relation to the number of engagements, proportion that relate to ESG issues and number of successful engagements with companies.</li> </ul> <p>SC aims to analyze the investment process of external managers from an ESG perspective in the initial due diligence. SC promotes responsible investment to existing managers that do not yet adhere to responsible investment principles.</p> <p>SC annually reviews the manager's responsible investment process. This analysis is documented in the investment research and due diligence memos. Investment decisions should consider this documentation. Regular updates on ESG should be documented in Manager Discussion Summaries.</p>
Fixed income - Corporate (financial)	See Fixed income - SSA.
Fixed income - Corporate (non-financial)	See Fixed income - SSA.
Property	<p>SC includes ESG assessment both in the initial due diligence as well as the ongoing monitoring of its external investment managers. External investment managers are expected to provide details of their ESG policies and disclose to SC:</p> <ul style="list-style-type: none"> <li>- How they integrate ESG into their investment decisions and the competence and drivers for their staff to incorporate ESG considerations.</li> <li>- Their ESG activities, including research, voting and engagement.</li> <li>- SC expects that fund managers will document and be able to provide meaningful data in relation to the number of engagements, proportion that relate to ESG issues and number of successful engagements with companies.</li> </ul> <p>SC aims to analyze the investment process of external managers from an ESG perspective in the initial due diligence. SC promotes responsible investment to existing managers that do not yet adhere to responsible investment principles.</p> <p>SC annually reviews the manager's responsible investment process. This analysis is documented in the investment research and due diligence memos. Investment decisions should consider this documentation. Regular updates on ESG should be documented in Manager Discussion Summaries.</p>
Other (1) [as defined in Organisational Overview module]	ESG is addressed in Leasing following the incorporation strategy for manager selection and private equity.

## Innovation

<b>SG 18</b>	<b>Voluntary</b>	<b>Public</b>	<b>Descriptive</b>	<b>General</b>
--------------	------------------	---------------	--------------------	----------------

<b>SG 18.1</b>	Indicate whether any specific features of your approach to responsible investment are particularly innovative.
----------------	--

Yes

<b>SG 18.2</b>	Describe any specific features of your approach to responsible investment that you believe are particularly innovative.
----------------	---

SEDCO Capital (SC) was the first Shariah-compliant signatory of the UNPRI. SC was the first Saudi Arabia-based asset manager to become a signatory of the UNPRI. SC stresses the similarities between Shariah-compliant and responsible investing in creating the term Prudent Ethical Investing (PEI) to merge both approaches.

SC has integrated its responsible investment strategy within its Islamic/ Shariah-compliant investment approach, which not only restricts investments in sectors considered unethical but also incorporates the quality of the balance sheet. SC refers to the incorporation of both approaches as Prudent Ethical Investing (PEI). We regard the concept of PEI as an evolution of responsible investment strategies:

- PEI stresses the importance of due diligence and transparency of investment structures, processes and reporting. Thus, it integrates the analysis of environmental, social and governance criteria in the investment process to incorporate non-financial aspects.
- PEI avoids high financial risks and thus aims to enhance long-term risk-adjusted return. The Global Financial Crisis has clearly shown the downside of excessive leverage and financial risk. Through the entire business cycle, the avoidance of excessive financial risk leverage should deliver better risk-adjusted returns.
- PEI is an investment style, which through its prudence element biases its portfolios to better quality, thus avoiding high and undue risks.
- PEI demands the understanding for the underlying risks, structure and cash flows.

No

## Communication

<b>SG 19</b>	<b>Mandatory</b>	<b>Public</b>	<b>Core Assessed</b>	<b>PRI 6</b>
--------------	------------------	---------------	----------------------	--------------

<b>SG 19.1</b>	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.
----------------	---

	Listed equity – (Proxy) Voting
--	--------------------------------

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

<b>Disclosure to clients/beneficiaries</b>	
	<p><b>Disclosure to clients/beneficiaries</b></p> <p><input type="radio"/> Explain all voting decisions</p> <p><input checked="" type="radio"/> Explain some voting decisions</p> <p><input type="radio"/> Only explain abstentions and votes against management</p> <p><input type="radio"/> No explanations provided</p>
	<p><b>Frequency</b></p> <p><input type="checkbox"/> Quarterly</p> <p><input type="checkbox"/> Biannually</p> <p><input checked="" type="checkbox"/> Annually</p> <p><input type="checkbox"/> Less frequently than annually</p> <p><input type="checkbox"/> Ad hoc/when requested</p>

**Listed equity - Incorporation**

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

**The information disclosed to clients/beneficiaries is the same**

- Yes
- No

<b>Disclosure to public and URL</b>	
<p><b>Disclosure to public and URL</b></p> <p><input checked="" type="radio"/> Broad approach to ESG incorporation</p> <p><input type="radio"/> Detailed explanation of ESG incorporation strategy used</p>	<p><b>Disclosure to clients/beneficiaries</b></p> <p><input type="radio"/> Broad approach to ESG incorporation</p> <p><input checked="" type="radio"/> Detailed explanation of ESG incorporation strategy used</p>
<p><b>Frequency</b></p> <p><input type="checkbox"/> Quarterly or more frequently</p> <p><input type="checkbox"/> Biannually</p> <p><input checked="" type="checkbox"/> Annually</p> <p><input type="checkbox"/> Less frequently than annually</p> <p><input type="checkbox"/> Ad-hoc/when requested</p>	<p><b>Frequency</b></p> <p><input type="checkbox"/> Quarterly or more frequently</p> <p><input type="checkbox"/> Biannually</p> <p><input checked="" type="checkbox"/> Annually</p> <p><input type="checkbox"/> Less frequently than annually</p> <p><input type="checkbox"/> Ad-hoc/when requested</p>
<p><b>URL</b></p> <p><a href="http://sedccapital.com/philosophy#UNPRI">http://sedccapital.com/philosophy#UNPRI</a></p>	

**Private equity**

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

**The information disclosed to clients/beneficiaries is the same**

- Yes
- No

<b>Disclosure to public and URL</b>		
<p><b>Disclosure to public and URL</b></p> <p><input checked="" type="checkbox"/> ESG information in relationship to our pre-investment activities</p> <p><input type="checkbox"/> ESG information in relationship to our post-investment monitoring and ownership activities</p> <p><input type="checkbox"/> Information on our portfolio companies' ESG performance</p> <p><input checked="" type="checkbox"/> Other</p> <p><b>Specify</b></p> <p>High level overview on responsible investment integration</p>	<p><b>Disclosure to clients/beneficiaries</b></p> <p><input checked="" type="checkbox"/> ESG information in relationship to our pre-investment activities</p> <p><input checked="" type="checkbox"/> ESG information in relationship to our post-investment monitoring and ownership activities</p> <p><input checked="" type="checkbox"/> Information on our portfolio companies' ESG performance</p> <p><input type="checkbox"/> Other</p>	
<p><b>Frequency</b></p> <p><input type="checkbox"/> Quarterly or more frequently</p> <p><input type="checkbox"/> Biannually</p> <p><input checked="" type="checkbox"/> Annually</p> <p><input type="checkbox"/> Less frequently than annually</p> <p><input type="checkbox"/> Ad-hoc/when requested</p>	<p><b>Frequency</b></p> <p><input type="checkbox"/> Quarterly or more frequently</p> <p><input type="checkbox"/> Biannually</p> <p><input checked="" type="checkbox"/> Annually</p> <p><input type="checkbox"/> Less frequently than annually</p> <p><input type="checkbox"/> Ad-hoc/when requested</p>	
<p><b>URL</b></p> <p><a href="http://sedccapital.com/philosophy#UNPRI">http://sedccapital.com/philosophy#UNPRI</a></p>		

**Property**

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

**The information disclosed to clients/beneficiaries is the same**

- Yes
- No

<b>Disclosure to public and URL</b>		
<p><b>Disclosure to public and URL</b></p> <p><input checked="" type="checkbox"/> ESG information on how you select property investments</p> <p><input type="checkbox"/> ESG information on how you monitor and manage property investments</p> <p><input type="checkbox"/> Information on your property investments' ESG performance</p> <p><input checked="" type="checkbox"/> Other</p> <p><b>Specify</b></p> <p>High level overview on responsible investment integration</p>	<p><b>Disclosure to clients/beneficiaries</b></p> <p><input checked="" type="checkbox"/> ESG information on how you select property investments</p> <p><input checked="" type="checkbox"/> ESG information on how you monitor and manage property investments</p> <p><input type="checkbox"/> Information on your property investments' ESG performance</p> <p><input type="checkbox"/> Other</p>	
<p><b>Frequency</b></p> <p><input type="checkbox"/> Quarterly or more frequently</p> <p><input type="checkbox"/> Biannually</p> <p><input checked="" type="checkbox"/> Annually</p> <p><input type="checkbox"/> Less frequently than annually</p> <p><input type="checkbox"/> Ad-hoc/when requested</p>	<p><b>Frequency</b></p> <p><input type="checkbox"/> Quarterly or more frequently</p> <p><input type="checkbox"/> Biannually</p> <p><input checked="" type="checkbox"/> Annually</p> <p><input type="checkbox"/> Less frequently than annually</p> <p><input type="checkbox"/> Ad-hoc/when requested</p>	
<p><b>URL</b></p> <p><a href="http://sedcocapital.com/philosophy#UNPRI">http://sedcocapital.com/philosophy#UNPRI</a></p>		

**Selection, Appointment and Monitoring**

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

**The information disclosed to clients/beneficiaries is the same**

- Yes
- No

<b>Disclosure to public and URL</b>		
<p><b>Disclosure to public and URL</b></p> <p><input checked="" type="checkbox"/> How responsible investment considerations are included in manager selection, appointment and monitoring processes</p> <p><input type="checkbox"/> Details of the responsible investment activities carried out by managers on your behalf</p> <p><input type="checkbox"/> E, S and/or G impacts and outcomes that have resulted from your managers' investments and/or active ownership</p> <p><input checked="" type="checkbox"/> Other</p> <p><b>Specify</b></p> <p>High level overview on responsible investment integration</p>	<p><b>Disclosure to clients/beneficiaries</b></p> <p><input checked="" type="checkbox"/> How responsible investment considerations are included in manager selection, appointment and monitoring processes</p> <p><input checked="" type="checkbox"/> Details of the responsible investment activities carried out by managers on your behalf</p> <p><input checked="" type="checkbox"/> E, S and/or G impacts and outcomes that have resulted from your managers' investments and/or active ownership</p> <p><input type="checkbox"/> Other</p>	
<p><b>Frequency</b></p> <p><input type="checkbox"/> Quarterly or more frequently</p> <p><input type="checkbox"/> Biannually</p> <p><input checked="" type="checkbox"/> Annually</p> <p><input type="checkbox"/> Less frequently than annually</p> <p><input type="checkbox"/> Ad-hoc/when requested</p>	<p><b>Frequency</b></p> <p><input type="checkbox"/> Quarterly or more frequently</p> <p><input type="checkbox"/> Biannually</p> <p><input checked="" type="checkbox"/> Annually</p> <p><input type="checkbox"/> Less frequently than annually</p> <p><input type="checkbox"/> Ad-hoc/when requested</p>	
<p><b>URL</b></p> <p><a href="http://sedccapital.com/philosophy#UNPRI">http://sedccapital.com/philosophy#UNPRI</a></p>		

# SEDCO Capital

## Reported Information

### Public version

#### Indirect – Manager Selection, Appointment and Monitoring

## PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

## Listed Equity and Fixed Income Strategies

SAM 01	Mandatory	Public	Gateway	PRI 1
--------	-----------	--------	---------	-------

**SAM 01.1** Indicate which of the following ESG incorporation strategies you require your external manager(s) to implement on your behalf for all your listed equity and/or fixed income assets:

### Active investment strategies

Active investment strategies	Listed Equity				
Screening	<input checked="" type="checkbox"/>				
Thematic	<input checked="" type="checkbox"/>				
Integration	<input checked="" type="checkbox"/>				
None of the above	<input type="checkbox"/>				

### Passive investment strategies

Passive investment strategies	Listed Equity				
Screening	<input checked="" type="checkbox"/>				
Thematic	<input type="checkbox"/>				
Integration	<input checked="" type="checkbox"/>				
None of the above	<input type="checkbox"/>				

## Selection

SAM 02	Mandatory	Public	Core Assessed	PRI 1
--------	-----------	--------	---------------	-------

**SAM 02.1** Indicate what RI-related information your organisation typically covers in the majority of selection documentation for your external managers

	LE					Private equity		
Investment strategy and how ESG objectives relate to it	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
ESG incorporation requirements	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
ESG reporting requirements	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
Other	<input type="checkbox"/>					<input type="checkbox"/>		
No RI information covered in the RFPs	<input type="checkbox"/>					<input type="checkbox"/>		

**SAM 02.2**

Explain how your organisation evaluates the investment manager's ability to align between your investment strategy and their investment approach

Strategy

	LE					Private equity		
Assess the time horizon of the investment manager's offering vs. your/beneficiaries' requirements	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
Assess the quality of investment policy and its reference to ESG	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
Assess the investment approach and how ESG objectives are implemented in the investment process	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
Review the manager's firm-level vs. product-level approach to RI	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
Assess the ESG definitions to be used	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
Other	<input type="checkbox"/>					<input type="checkbox"/>		
None of the above	<input type="checkbox"/>					<input type="checkbox"/>		

ESG people/oversight

	LE					Private equity		
Assess ESG expertise of investment teams	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
Review the oversight and responsibilities of ESG implementation	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
Review how is ESG implementation enforced /ensured	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
Review the manager's RI-promotion efforts and engagement with the industry	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
Other	<input type="checkbox"/>					<input type="checkbox"/>		
None of the above	<input type="checkbox"/>					<input type="checkbox"/>		

Process/portfolio construction/investment valuation

	LE					Private equity		
Review the process for ensuring the quality of the ESG data used	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
Review and agree the use of ESG data in the investment decision making process	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
Review and agree the impact of ESG analysis on investment decisions	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
Review and agree ESG objectives (e.g. risk reduction, return seeking, real-world impact)	<input checked="" type="checkbox"/>					<input type="checkbox"/>		
Review and agree manager's ESG risk framework	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
Review and agree ESG risk limits at the portfolio level (portfolio construction) and other ESG objectives	<input checked="" type="checkbox"/>					<input type="checkbox"/>		
Review how ESG materiality is evaluated by the manager	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
Review process for defining and communicating on ESG incidents	<input type="checkbox"/>					<input checked="" type="checkbox"/>		
Review and agree ESG reporting frequency and detail	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
Other, specify	<input type="checkbox"/>					<input type="checkbox"/>		
None of the above	<input type="checkbox"/>					<input type="checkbox"/>		

### SAM 02.3

Indicate the selection process and its ESG/RI components

- Review ESG/RI responses to RfP, RfI, DDQ etc.
- Review responses to PRI's Limited Partners' Responsible Investment Due Diligence Questionnaire (LP DDQ)
- Review publicly available information on ESG/RI
- Review assurance process on ESG/RI data and processes
- Review PRI Transparency Reports
- Request and discuss PRI Assessment Reports
- Meetings with the potential shortlisted managers covering ESG/RI themes
- Site visits to potential managers offices
- Other, specify

### SAM 02.4

When selecting external managers does your organisation set any of the following:

	LE					Private equity		
ESG performance development targets	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
ESG score	<input type="checkbox"/>					<input type="checkbox"/>		
ESG weight	<input type="checkbox"/>					<input type="checkbox"/>		
Real world economy targets	<input type="checkbox"/>					<input type="checkbox"/>		
Other RI considerations	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
None of the above	<input type="checkbox"/>					<input type="checkbox"/>		

If you select any 'Other' option(s), specify

Restrictions of certain activities deemed unethical.

<b>SAM 03</b>	<b>Mandatory</b>	<b>Public</b>	<b>Additional Assessed</b>	<b>PRI 2</b>
---------------	------------------	---------------	----------------------------	--------------

**SAM 03.1**

Indicate how your organisation typically evaluates the manager's active ownership practices in the majority of the manager selection process.

Engagement

	LE				
Review the manager's engagement policy	<input checked="" type="checkbox"/>				
Review the manager's engagement process (with examples and outcomes)	<input checked="" type="checkbox"/>				
Ensure that engagement outcomes feed back into the investment decision-making process	<input checked="" type="checkbox"/>				
Other engagement issues in your selection process specify	<input type="checkbox"/>				
None of the above	<input type="checkbox"/>				

(Proxy) voting

	<b>LE</b>
Review the manager's voting policy	<input checked="" type="checkbox"/>
Review the manager's ability to align voting activities with clients' specific voting policies	<input type="checkbox"/>
Review the manager's process for informing clients about voting decisions	<input checked="" type="checkbox"/>
Ensure that voting outcomes feed back into the investment decision-making process	<input type="checkbox"/>
Review the number of votes cast as a percentage of ballots/AGMs or holdings and available rationale	<input checked="" type="checkbox"/>
Other active ownership voting issues in your selection process; specify	<input type="checkbox"/>
None of the above	<input type="checkbox"/>

**SAM 03.2**

Describe how you assess if the manager's engagement approach is effective.

- Impact on investment decisions
- Financial impact on target company or asset class
- Impact on ESG profile of company or the portfolio
- Evidence of changes in corporate practices(i.e. ESG policies and implementation activities)
- Other, specify
- None of the above

**SAM 03.3**

Describe how you assess if the manager's voting approach is effective/appropriate

- Impact on investment decisions
- Impact on ESG profile of company or the portfolio
- Evidence of changes in corporate practices(i.e. ESG policies and implementation activities)
- Other, specify
- None of the above

**Appointment**

<b>SAM 04</b>	<b>Mandatory</b>	<b>Public</b>	<b>Core Assessed</b>	<b>PRI 1</b>
---------------	------------------	---------------	----------------------	--------------

**SAM 04.1**

Indicate if in the majority of cases and where the structure of the product allows, your organisation does any of the following as part of the manager appointment and/or commitment process

- Sets standard benchmarks or ESG benchmarks
- Defines ESG objectives
- Sets incentives and controls linked to the ESG objectives
- Requires reporting on ESG objectives
- Requires the investment manager to adhere to ESG guidelines, regulations, principles or standards
- None of the above
- None of the above, we invest only in pooled funds and have a thorough selection process

**SAM 04.2**

Provide an example per asset class of your benchmarks, objectives, incentives/controls and reporting requirements that would typically be included in your managers' appointment.

## Asset class

- Listed equity (LE)

## Benchmark

- Standard benchmark
- ESG benchmark, specify  
typically Dow Jones Islamic Market indices

## ESG Objectives

- ESG related strategy, specify
- ESG related investment restrictions, specify
- ESG integration, specify  
**Evaluation of ESG criteria as part of the investment process**
- Engagement, specify
- Voting, specify  
**Review of the % coverage of proxy votes and details such as % votes against management recommendations.**
- Promoting responsible investment  
**Active ownership according to ESG considerations.**
- ESG specific improvements
- ESG guidelines/regulation, principles/standards, specify
- Other, specify

## Incentives and controls

- Fee based incentive
- Communication and remedy of breaches
- Termination
- No fee/ breach of contract

## Reporting requirements

- Monthly
  - Quarterly
  - Bi-annually
  - Annually
  - Ad-hoc/when requested
- Private equity

## Benchmark

- Standard benchmark, specify  
Absolute return benchmark as a multi-year performance target
- ESG benchmark, specify

## ESG Objectives

- ESG related strategy, specify  
Such as Shariah-compliance and thematic investment strategies
- ESG related investment restrictions, specify  
Exclusion of certain activities and sectors
- ESG integration, specify  
Evaluation of ESG criteria as part of the investment process
- Engagement, specify  
KPIs and ESG initiatives for value creation
- Voting, specify
- Promoting responsible investment
- ESG specific improvements
- ESG guidelines/regulation, principles/standards, specify

## Incentives and controls

- Fee based incentive
- Communication and remedy of breaches
- Termination
- No fee/ breach of contract

## Reporting requirements

- Ad-hoc/when requested
- Annually
- Bi-annually
- Quarterly
- Monthly

**SAM 04.4** | Indicate which of these actions your organisation might take if any of the requirements are not met

- Discuss requirements not met and set project plan to rectify
- Place investment manager on a “watch list”
- Track and investigate reason for non-compliance
- Re-negotiate fees
- Failing all actions, terminate contract with the manager
- Other, specify
- No actions are taken if any of the ESG requirements are not met

**Monitoring**

**SAM 05**

**Mandatory**

**Public**

**Core Assessed**

**PRI 1**

**SAM 05.1**

When monitoring managers, indicate which of the following types of responsible investment information your organisation typically reviews and evaluates

	LE					Private equity		
ESG objectives linked to investment strategy	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
Evidence on how the ESG incorporation strategy(ies) affected the investment decisions and financial / ESG performance of the portfolio/fund	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
Compliance with investment restrictions and any controversial investment decisions	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
ESG portfolio characteristics	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
How ESG materiality has been evaluated by the manager in the monitored period	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
Information on any ESG incidents	<input type="checkbox"/>					<input checked="" type="checkbox"/>		
Metrics on the real economy influence of the investments	<input type="checkbox"/>					<input type="checkbox"/>		
PRI Transparency Reports	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
PRI Assessment Reports	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
RI-promotion and engagement with the industry to enhance RI implementation	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
Other general RI considerations in investment management agreements; specify	<input type="checkbox"/>					<input type="checkbox"/>		
None of the above	<input type="checkbox"/>					<input type="checkbox"/>		

**SAM 05.2**

When monitoring external managers, does your organisation set any of the following to measure compliance/progress

	LE					Private equity		
ESG score	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
ESG weight	<input type="checkbox"/>					<input type="checkbox"/>		
ESG performance minimum threshold	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
Real world economy targets	<input type="checkbox"/>					<input type="checkbox"/>		
Other RI considerations	<input type="checkbox"/>					<input type="checkbox"/>		
None of the above	<input type="checkbox"/>					<input type="checkbox"/>		

SAM 06	Mandatory	Public	Additional Assessed	PRI 1
--------	-----------	--------	---------------------	-------

**SAM 06.1** When monitoring managers, indicate which of the following active ownership information your organisation typically reviews and evaluates from the investment manager in meetings/calls

Engagement

	LE				
Report on engagements undertaken (summary with metrics, themes, issues, sectors or similar)	<input checked="" type="checkbox"/>				
Report on engagement ESG impacts (outcomes, progress made against objectives and examples)	<input checked="" type="checkbox"/>				
Information on any escalation strategy taken after initial unsuccessful dialogue	<input type="checkbox"/>				
Alignment with any eventual engagement programme done internally	<input type="checkbox"/>				
Information on the engagement activities' impact on investment decisions	<input checked="" type="checkbox"/>				
Other RI considerations relating to engagement in investment management agreements; specify	<input type="checkbox"/>				
None of the above	<input type="checkbox"/>				

(Proxy) voting

	<b>LE</b>
Report on voting undertaken (with outcomes and examples)	<input checked="" type="checkbox"/>
Report on voting decisions taken	<input checked="" type="checkbox"/>
Adherence with the agreed upon voting policy	<input checked="" type="checkbox"/>
Other RI considerations relating to (proxy) voting in investment management agreements; specify	<input type="checkbox"/>
None of the above	<input type="checkbox"/>

<b>SAM 07</b>	<b>Mandatory</b>	<b>Public</b>	<b>Core Assessed</b>	<b>PRI 2</b>
---------------	------------------	---------------	----------------------	--------------

**SAM 07.1** For the listed equities for which you have given your external managers a (proxy) voting mandate, indicate the approximate percentage (+/- 5%) of votes that were cast during the reporting year.

Votes cast (to the nearest 5%)

	%
--	---

95.1

	Specify the basis on which this percentage is calculated.
--	---

- Of the total number of ballot items on which they could have issued instructions
- Of the total number of company meetings at which they could have voted
- Of the total value of your listed equity holdings on which they could have voted
- We do not collect this information.

## Outputs and outcomes

<b>SAM 09</b>	<b>Mandatory</b>	<b>Public</b>	<b>Additional Assessed</b>	<b>PRI 1,6</b>
---------------	------------------	---------------	----------------------------	----------------

**SAM 09.1** Provide examples of how ESG issues have been addressed in the manager selection, appointment and/or monitoring process for your organisation during the reporting year.

Add Example 1

Topic or issue	Responsible investments as a performance driver
Conducted by	<input checked="" type="checkbox"/> Internal staff
Asset class	<input type="checkbox"/> All asset classes <input checked="" type="checkbox"/> Listed Equity
Scope and process	For a quantitative equity strategy, performance comparison between conventional and responsible investment strategies
Outcomes	Selection of responsible investment strategy as it created measurable value-added

Add Example 2

Topic or issue	ESG study by one of SC's private equity managers when to support the value-add strategy of a portfolio company
Conducted by	<input type="checkbox"/> Internal staff
Asset class	<input type="checkbox"/> All asset classes <input type="checkbox"/> Listed Equity
Scope and process	PE manager commissioned study on ESG risks/benefits on a portfolio company to support value creation
Outcomes	ESG study created value add, because it helped to focus resources. It may also help when exiting the company.

Add Example 3

Add Example 4

Add Example 5

We are not able to provide examples

# SEDCO Capital

## Reported Information

### Public version

### Direct - Listed Equity Incorporation

## PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

## ESG incorporation in actively managed listed equities

### Implementation processes

LEI 01	Mandatory	Public	Core Assessed	PRI 1
--------	-----------	--------	---------------	-------

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

<b>LEI 01.1</b>	Indicate (1) which ESG incorporation strategy and/or combination of strategies you apply to your actively managed listed equities and (2) the breakdown of your actively managed listed equities by strategy or combination of strategies (+/- 5%)
-----------------	--

#### ESG incorporation strategy (select all that apply)

- Screening alone (i.e. not combined with any other strategies)
- Thematic alone (i.e. not combined with any other strategies)
- Integration alone (i.e. not combined with any other strategies)
- Screening and integration strategies

Percentage of active listed equity to which the strategy is applied	<div style="display: flex; align-items: center;"> <div style="width: 100px; height: 20px; background-color: #0070C0; margin-right: 5px;"></div> <span style="margin-left: 5px;">%</span> </div> <p style="margin-top: 5px;">100</p>
---	---

- Thematic and integration strategies
- Screening and thematic strategies
- All three strategies combined
- We do not apply incorporation strategies

	Total actively managed listed equities
--	--

100%

<b>LEI 01.2</b>	Describe your organisation's approach to incorporation and the reasons for choosing the particular ESG incorporation strategy/strategies.
-----------------	---

SEDCO Capital (SC) stresses the similarities of Shariah-compliance and responsible investing. PRI is a principle based framework designed to encourage the incorporation and analysis of Environmental, Social and Governance (ESG) characteristics in the context of risk for investments.

SEDCO Capital refers to its approach of integrating responsible and Shariah-compliant investment as Prudent Ethical Investment (PEI). PEI can deliver distinct return/risk characteristics relative to conventional strategies. Shariah-compliant balance sheet screens tend to provide a prudence element and bias portfolios towards quality characteristics. Positive ESG screening can potentially improve risk-adjusted returns as well.

Islamic finance and responsible investing are both ethical in nature. Both principles align in their aim to improve the living conditions and well-being of society, to establish social equality and to prevent injustice in trade relations. Accordingly, SC sees much synergy between the two principles.

Islamic finance and responsible investment are well aligned. SC considers Shariah-compliant investing as a sub-set of responsible investing. Therefore, SC applies the same investment guidelines and aims to restrict non-permissible activities which include the following:

- The manufacture and/or sale/distribution of alcohol, tobacco and pornographic productions.
- Restaurant or hotel/motel businesses, except those not selling alcohol.
- Operators of gambling casinos or manufacturers of gambling machines.
- The manufacture of military defense equipment or weaponry.

Besides the exclusions, which are defined in SC's Shariah Manual among other investment restrictions and negative screens, SC does not make a priori exclusions in the sense of refusing to invest in companies with predefined activities it deems unethical.

The long-term profitability and competitiveness of companies depends on their capacity to take into account the imperatives of sustainable development, human rights and abide to strong governance standards. SC supports the principle that companies have a responsibility to comply with international norms. Furthermore, companies shall respect the rule of law in the countries in which they operate.

SC integrates ESG issues into traditional financial analysis. SC's investment process should substantially reduce the probability that it will make an investment that is ethically questionable or that exposes investors to high risks resulting from environmental, social and governance criteria. Thus, investments with significant weaknesses and risks on the basis of ESG criteria will be excluded from the investment universe - on a case by case basis.

**LEI 01.3**

If assets are managed using a combination of ESG incorporation strategies, briefly describe how these combinations are used. [Optional]

SC uses negative screens to filter out non-compliant stocks. Thus the investable universe is derived.

Constituents of the investable universe are analyzed from an ESG perspective through its internal research. SC's ESG analysis is integrated in the analysis of its target companies. The results of the ESG analysis are discussed between investment analyst and fund manager.

## (A) Implementation: Screening

**LEI 04**

**Mandatory**

**Public**

**Descriptive**

**PRI 1**

**LEI 04.1**

Indicate and describe the type of screening you apply to your internally managed active listed equities.

### Type of screening

- Negative/exclusionary screening

### Screened by

- Product
- Activity
- Sector
- Country/geographic region
- Environmental and social practices and performance
- Corporate governance

Description
-------------

SC has implemented a multi-level screening process.

- Positive/best-in-class screening

**Screened by**

- Product
- Activity
- Sector
- Country/geographic region
- Environmental and social practices and performance
- Corporate governance

Description
-------------

SC performs general evaluation of ESG risks for a stock. This ESG assessment is (where possible) put in perspective to sector peers.

- Norms-based screening

LEI 04.2	Describe how the screening criteria are established, how often the criteria are reviewed and how you notify clients and/or beneficiaries when changes are made.
----------	---

ESG is analysed on a stock level. Negative outcomes are discussed to determine potential engagement.

We exclude the following sectors/activities (among other investment restrictions):

- The manufacture and/or sale/distribution of alcohol, tobacco and pornographic productions.
- Restaurant or hotel/motel businesses, except those not selling alcohol.
- Operators of gambling casinos or manufacturers of gambling machines.
- The manufacture of military defense equipment or weaponry.

The negative screening criteria typically do not change. Stocks are regularly reviewed if they still pass the negative screening criteria.

Management assessment and board related developments are monitored on daily basis to identify any weaknesses that can cause strategic dislocation for the investee company.

SC's criteria for negative screening generally are not expected to change.

LEI 05	Mandatory	Public	Core Assessed	PRI 1
--------	-----------	--------	---------------	-------

**LEI 05.1**

Indicate which processes your organisation uses to ensure screening is based on robust analysis.

- Comprehensive ESG research is undertaken or sourced to determine companies' activities and products.
- Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- External research and data used to identify companies to be excluded/included is subject to internal audit by ESG/RI staff, the internal audit function or similar
- Third-party ESG ratings are updated regularly to ensure that portfolio holdings comply with fund policies.
- A committee or body with representatives independent of the individuals who conduct company research reviews some or all screening decisions
- A periodic review of the quality of the research undertaken or provided is carried out
- Review and evaluation of external research providers
- Other, specify
- None of the above

**LEI 05.2**

Indicate the proportion of your actively managed listed equity portfolio that is subject to comprehensive ESG research as part your ESG screening strategy.

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

**LEI 05.3**

Indicate how frequently third party ESG ratings are updated for screening purposes.

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

### (C) Implementation: Integration of ESG issues

**LEI 08**

**Mandatory**

**Public**

**Core Assessed**

**PRI 1**

**LEI 08.1**

Indicate which ESG factors you systematically research as part of your investment analysis and the proportion of actively managed listed equity portfolios that is impacted by this analysis.

ESG issues	Proportion impacted by analysis
Environmental	 <p>Environmental</p> <p> <input type="radio"/> &lt;10%  <input type="radio"/> 10-50%  <input checked="" type="radio"/> 51-90%  <input type="radio"/> &gt;90% </p>
Social	 <p>Social</p> <p> <input type="radio"/> &lt;10%  <input type="radio"/> 10-50%  <input checked="" type="radio"/> 51-90%  <input type="radio"/> &gt;90% </p>
Corporate Governance	 <p>Corporate Governance</p> <p> <input type="radio"/> &lt;10%  <input type="radio"/> 10-50%  <input type="radio"/> 51-90%  <input checked="" type="radio"/> &gt;90% </p>

# SEDCO Capital

## Reported Information

### Public version

#### Direct - Listed Equity Active Ownership

## PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

## (Proxy) voting and shareholder resolutions

### Overview

LEA 15

Mandatory

Public

Core Assessed

PRI 1,2,3

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

LEA 15.1

Indicate whether your organisation has a formal voting policy.

Yes

LEA 15.2

Indicate what your voting policy covers:

- Conflicts of interest
- Share blocking
- Securities lending process
- Prioritisation of voting activities
- Decision making processes
- Environmental factors
- Social factors
- Governance factors
- Filing/co-filing resolutions
- Extraordinary meetings
- Regional voting practices
- Transparency of proxy voting activities
- Company dialogue pre/post vote
- Other, describe
- None of the above

LEA 15.4

Provide a brief overview of your organization's approach to (proxy) voting.

In line with SEDCO Capital's (SC) Responsible Investment Policy, SC believes it is important to exercise its rights as an active owner on behalf of its clients through ongoing engagement and proxy voting with the companies in which it invests. For SC it is important to learn about a company's operations and therefore enable a robust assessment of their long term prospects by meeting with management and members of the Board and, where thought helpful, visiting operating sites to gain insight into a company's operation.

SC takes its duties as an asset manager seriously. These duties include engaging with companies, developing and enhancing in-house corporate governance policies, analyzing corporate governance issues on a case-by-case basis at the company level, and exercising its voting rights to maximize shareholder value.

SC aims to make all voting and engagement decisions in the best interest of its clients.

No

## Process

LEA 16

Mandatory

Public

Descriptive

PRI 2

LEA 16.1

Indicate how you typically make your (proxy) voting decisions.

### Approach

- We use our own research or voting team and make voting decisions without the use of service providers.
- We hire service provider(s) that make voting recommendations or provide research that we use to inform our voting decisions.

### Based on

- the service provider voting policy signed off by us
  - our own voting policy
  - our clients' requests or policy
  - other, explain
- We hire service provider(s) that make voting decisions on our behalf, except for some pre-defined scenarios for which we review and make voting decisions.
- We hire service provider(s) that make voting decisions on our behalf.

LEA 16.2

Provide an overview of how you ensure your voting policy is adhered to, giving details of your approach when exceptions to the policy are made (if applicable).

SC retains Institutional Shareholder Services Inc. ('ISS'), a firm with expertise in proxy voting and corporate governance as a service provider. The service provider considers environmental, social and corporate governance factors in its recommendations. SC reviews these recommendations and may act subject to its overriding duties to its clients.

SC utilizes ISS's services to gain proxy voting research and recommendations according to SC guidelines following the ISS Benchmark research offering.

SC investment professionals will review ISS's recommendations and execute proxy votes in accordance with SC's Proxy Voting Policy, SC's Shariah-compliant and Responsible Investment Policies and SC's Conflict of Interest Policy. SC investment professionals will document the specific rationale for any deviations from ISS's recommendations.

SC investment professionals keep track of upcoming proxy votes. SC investment professionals document data on the specific proxy votes and any form of engagement. In particular, any reasons for not executing a vote are documented to facilitate a high coverage ratio going forward. Specific votes may be referred to the SC Investment Committee for decision.

As an example, proxy votes are typically executed through the Tadawulaty system for Saudi stocks or the physical attendance of a SC representative at annual/extraordinary general meeting and through the fund's custodian.

LEA 16.3	Additional information.[Optional]
----------	-----------------------------------

Sedco Capital (SC) uses ISS as a research provider for proxy voting recommendations. The research provider considers environmental, social and corporate governance factors in its recommendations. SC reviews these recommendations and may act subject to its overriding duties to its clients.

LEA 20	Mandatory	Public	Core Assessed	PRI 2
--------	-----------	--------	---------------	-------

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

LEA 20.1	Indicate whether you or the service providers acting on your behalf raise any concerns with companies ahead of voting
----------	---

- Yes, in most cases
- Sometimes, in the following cases:
  - Votes for selected markets
  - Votes relating to certain ESG issues
  - Votes for significant shareholdings
  - Votes for companies we are engaging with
  - On request by clients
  - Other
- Neither we nor our service provider raise concerns with companies ahead of voting

LEA 20.2	Indicate whether you and/or the service provider(s) acting on your behalf, communicate the rationale to companies, when , you abstain or vote against management recommendations.
----------	---

- Yes, in most cases
- Sometimes, in the following cases.
- We do not communicate the rationale to companies
- Not applicable because we and/or our service providers do not abstain or vote against management recommendations

<b>Outputs and outcomes</b>				
-----------------------------	--	--	--	--

LEA 21	Mandatory	Public	Core Assessed	PRI 2
--------	-----------	--------	---------------	-------

LEA 21.1	For listed equities where you and/or your service provider have the mandate to issue (proxy) voting instructions, indicate the percentage of votes cast during the reporting year.
----------	--

- We do track or collect this information

Votes cast (to the nearest 1%)
--------------------------------

80 %

80

Specify the basis on which this percentage is calculated

- of the total number of ballot items on which you could have issued instructions
- of the total number of company meetings at which you could have voted
- of the total value of your listed equity holdings on which you could have voted

**LEA 21.2** Explain your reason(s) for not voting certain holdings

- Shares were blocked
  - Notice, ballots or materials not received in time
  - Missed deadline
  - Geographical restrictions (non-home market)
  - Cost
  - Conflicts of interest
  - Holdings deemed too small
  - Administrative impediments (e.g., power of attorney requirements, ineligibility due to participation in share placement)
  - On request by clients
  - Other
- We do not track or collect this information

<b>LEA 22</b>	<b>Mandatory</b>	<b>Public</b>	<b>Additional Assessed</b>	<b>PRI 2</b>
---------------	------------------	---------------	----------------------------	--------------

**LEA 22.1** Indicate if you track the voting instructions that you and/or your service provider on your behalf have issued.

- Yes, we track this information

**LEA 22.2** Of the voting instructions that you and/or third parties on your behalf issued, indicate the proportion of ballot items that were:

Voting instructions	Breakdown as percentage of votes cast
For (supporting) management recommendations	 92
Against (opposing) management recommendations	 8
Abstentions	 0

100%

**LEA 22.3** Describe the actions you take in relation to voting against management recommendations.

Evaluation vs. the research provider, SC's Proxy Voting Policy, SC's Shariah-compliant and Responsible Investment Policies and SC's Conflict of Interest Policy. Potentially documenting the rationale when deviating from the research provider's assessment.

No, we do not track this information

# SEDCO Capital

## Reported Information

### Public version

### Direct – Private Equity

## PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

## Overview

PE 01	Voluntary	Public	Descriptive	PRI 1-6
-------	-----------	--------	-------------	---------

PE 01.1	Provide a brief overview of your organisation's approach to responsible investment in private equity.
---------	---

SEDCO Capital's (SC) focus is to engage with private equity general partners (GPs) to promote the incorporation of ESG into investment decisions as part of its ongoing dialogue with the GPs and, where applicable, through its participation in Advisory Committees. SC may agree certain ESG considerations and exclusions through side letters with the GPs.

For co- and direct-investments, SC aims to use an active ownership approach to promote ESG considerations with portfolio companies and/or general partners leading the transaction. In particular, SC aims to integrate ESG aspects in deal documentation and to engage with portfolio companies to directly and indirectly promote ESG compliance and reporting. However, SC's ability to require any ESG due diligence or reporting may often be very limited.

SC invests in a Shariah-compliant way. Islamic finance and responsible investment are well aligned. SC considers Shariah-compliant investing as a sub-set of responsible investing. Therefore, SC applies the same investment guidelines and aims to restrict non-permissible activities which include the following:

- (i) The manufacture and/or sale/distribution of alcohol, tobacco and pornographic productions.
- (ii) Restaurant or hotel/motel businesses, except those not selling alcohol.
- (iii) Operators of gambling casinos or manufacturers of gambling machines.
- (iv) The manufacture of military defense equipment or weaponry.

Besides the exclusions, which are defined in SC's Shariah Manual among other investment restrictions, SC does not make a priori exclusions in the sense of refusing to invest in companies with predefined activities deemed unethical.

SC's investment process should substantially reduce the probability that it will make an investment that is ethically questionable or that exposes investors to high risks resulting from environmental, social and governance criteria. Thus, investments with significant weaknesses and risks on the basis of ESG criteria are likely to be excluded from the investment universe.

PE 02	Mandatory	Public	Core Assessed	PRI 2
-------	-----------	--------	---------------	-------

PE 02.1	Indicate whether your organisation's investment activities are guided by a responsible investment policy / follow responsible investment guidelines.
---------	--

- Our investment activities are guided by a responsible investment policy

PE 02.2	Describe how your organisation outlines expectations on staff and portfolio companies' approach towards ESG issues in investment activities.
---------	--

Responsibility for maintaining and periodically reviewing the Responsible Investment policy is the responsibility of the CRO and SC's respective governance bodies. The Head of Private Equity is responsible for ensuring the execution of this policy for private equity fund, co- and direct investments.

SC staff addresses ESG issues in the proactive sourcing of investment opportunities, the due diligence and investment process, the ongoing monitoring of investments and (where applicable) in the eventual divestment process. ESG issues are documented in investment process documentation.

- Our investment activities are not guided by a responsible investment policy
- We do not have a responsible investment policy

## Fundraising of private equity funds

PE 03	Mandatory	Public	Core Assessed	PRI 1,4,6
-------	-----------	--------	---------------	-----------

PE 03.1

Indicate if your most recent fund placement documents (private placement memorandums (PPM) or similar) refer to responsible investment.

Yes

PE 03.2

Indicate how your most recent fund placement documents (PPM or similar) refer to the following responsible investment:

- Policy and commitment to responsible investment
- Approach to ESG issues in pre-investment processes
- Approach to ESG issues in post-investment processes
- Approach to ESG reporting

PE 03.3

Describe how your organisation refers to responsible investment in fund placement documents (PPMs or similar). [Optional]

The placement document refers to SC's commitment to the principles of responsible investing. Reference is made to SC's commitment to the six PRI principles such as the incorporation of ESG issues into decision-making processes. SC commits to be an active promoter of responsible investment and owner.

- No
- Not applicable as our organisation does not fundraise

## Pre-investment (selection)

PE 05	Mandatory	Public	Gateway	PRI 1
-------	-----------	--------	---------	-------

PE 05.1

During due-diligence indicate if your organisation typically incorporates ESG issues when selecting private equity investments.

Yes

PE 05.2

Describe your organisation's approach to incorporating ESG issues in private equity investment selection.

SC typically categorises opportunities based on ESG performance/issues. This approach is complemented with a qualitative review as part of its investment analysis and documentation.

No

PE 06	Mandatory	Public	Core Assessed	PRI 1,3
-------	-----------	--------	---------------	---------

PE 06.1

Indicate what type of ESG information your organisation typically considers during your private equity investment selection process.

- Raw data from target company
- Benchmarks against other companies
- Sector level data/benchmarks
- Country level data/benchmarks
- Reporting standards, industry codes and certifications
- International initiatives, declarations or standards
- Engagements with stakeholders (e.g. customers and suppliers)
- Advice from external resources
- Other, specify
- We do not track this information

PE 06.2

Describe how this information is reported to, considered and documented by the Investment Committee or similar.

The information is gathered in the due diligence process and summarized in detailed investment memos. A summary of the investment process documentation goes to the Investment Committee.

### Post-investment (monitoring)

PE 09

Mandatory

Public

Gateway/Core Assessed

PRI 2

PE 09.1

Indicate whether your organisation incorporates ESG issues in investment monitoring of portfolio companies.

- Yes

PE 09.2

Indicate the proportion of portfolio companies where your organisation included ESG performance in investment monitoring during the reporting year.

- >90% of portfolio companies
- 51-90% of portfolio companies
- 10-50% of portfolio companies
- <10% of portfolio companies

(in terms of total number of portfolio companies)

PE 09.3

Indicate ESG issues for which your organisation typically sets and monitors targets (KPIs or similar) and provide examples per issue.

#### ESG issues

- Environmental

List up to three example targets of environmental issues

Sustainability

Social

List up to three example targets of social issues

Job creation

Governance

List up to three example targets of governance issues

Transparency

We do not set and/or monitor against targets

No

PE 10	Mandatory	Public	Core Assessed	PRI 2
-------	-----------	--------	---------------	-------

**PE 10.1** Indicate if your organisation tracks the proportion of your portfolio companies that have an ESG/sustainability-related policy (or similar guidelines).

Yes

**PE 10.2** Indicate what percentage of your portfolio companies has an ESG/sustainability policy (or similar guidelines).

- >90% of portfolio companies
- 51-90% of portfolio companies
- 10-50% of portfolio companies
- <10% of portfolio companies
- 0% of portfolio companies

(in terms of total number of portfolio companies)

No

# SEDCO Capital

## Reported Information

### Public version

#### Direct - Property

## PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

## Overview

PR 01	Mandatory	Public	Core Assessed	PRI 1-6
-------	-----------	--------	---------------	---------

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

**PR 01.1** Indicate if your organisation has a Responsible Property Investment (RPI) policy.

Yes

**PR 01.2** Provide a URL or attach the document

URL

Attach Document

SC Responsible Investment Policy- Nov 17.pdf [192KB]

No

**PR 01.3** Provide a brief overview of your organisation's approach to responsible investment in property, and how you link responsible investment in property to your business strategy.

For SEDCO Capital (SC), responsible investing and environmental, social and (corporate) governance aspects are an integral part of its activities. SC's responsible investment policy for property is part of the responsible investment policy which covers all asset classes.

SC aims to be a prudent investor, who avoids undue risks and seeks sustainable investments with strong governance that are in compliance with relevant regulation. SC believes that an ESG overlay can lead to long-term rewards in terms of risk reduction and potentially higher returns. SC aims to use the ESG assessment to incorporate non-financial information and to identify risk factors.

Real estate investments are managed with the support of advisors and internally. SC generally invests directly in single properties - instead of funds. SC uses both screening and integration approaches in its investment activities in real estate. Properties or tenants in certain non-compliant sectors are avoided. SC strives to incorporate sustainability considerations with a specific focus on energy, water and waste. In its monitoring process, SC will address ESG considerations for investments. SC aims to analyse new investments from an ESG perspective.

## Fundraising of property funds

PR 02	Mandatory	Public	Core Assessed	PRI 1,4,6
-------	-----------	--------	---------------	-----------

**PR 02.1** Indicate if your most recent fund placement documents (private placement memorandums (PPMs) or similar) refer to responsible investment aspects of your organisation.

Yes

**PR 02.2**

Indicate how your fund placement documents (PPMs or similar) refer to the following responsible investment aspects of your organisation:

- Policy and commitment to responsible investment
- Approach to ESG issues in pre-investment processes
- Approach to ESG issues in post-investment processes

**PR 02.3**

Describe how your organisation refers to responsible investment for property funds in fund placement documents (PPMs or similar). [Optional]

The placement documents mention that SEDCO Capital (SC) is a signatory of the Principles for Responsible Investment and the background of the framework. The fund documents refer to SC's philosophy and rationale and integration of ESG into the investment process.

- No
- Not applicable as our organisation does not fundraise

### Pre-investment (selection)

**PR 04**

**Mandatory**

**Public**

**Gateway/Core Assessed**

**PRI 1**

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

**PR 04.1**

Indicate if your organisation typically incorporates ESG issues when selecting property investments.

- Yes

**PR 04.2**

Provide a description of your organisation's approach to incorporating ESG issues in property investment selection.

ESG issues are assessed in the initial due diligence of potential property acquisitions. The potential risks and benefits are evaluated in the due diligence documentation. SEDCO Capital (SC) also scores new investment opportunities with an ESG checklist.

Furthermore, SC evaluates and updates ESG aspects for existing properties on a regular basis. SC follows a Shariah-compliant investment approach. Islamic finance and responsible investment are well aligned. SC considers Shariah-compliant investing as a sub-set of responsible investing. Therefore, SC applies the same investment guidelines and aims to restrict non-permissible activities which include the following:

- (i) The manufacture and/or sale/distribution of alcohol, tobacco and pornographic productions.
- (ii) Restaurant or hotel/motel businesses, except those not selling alcohol.
- (iii) Operators of gambling casinos or manufacturers of gambling machines.
- (iv) The manufacture of military defense equipment or weaponry.

Besides the exclusions, which are defined in SC's Shariah Manual among other investment restrictions, SC does not make a priori exclusions in the sense of refusing to invest in companies with predefined activities deemed unethical.

SC's investment process should substantially reduce the probability that it will make an investment that is ethically questionable or that exposes investors to high risks resulting from environmental, social and governance criteria. Thus, investments with significant weaknesses and risks on the basis of ESG criteria should be excluded from the investment universe - on a case by case basis.

**PR 04.3**

Indicate which E, S and/or G issues are typically considered by your organisation in the property investment selection process, and list up to three examples per issue.

**ESG issues**

Environmental

List up to three typical examples per E, S and G issue

- Climate change adaptation
- Contamination
- Energy efficiency
- Energy supply
- Flooding
- GHG emissions
- Indoor environmental quality
- Natural hazards
- Resilience
- Transportation
- Water efficiency
- Waste management
- Water supply
- Other
- Other

Description [OPTIONAL]

Does the building meet energy efficiency standards? Is there a plan to address value enhancements through ESG criteria?

List up to three typical examples per E, S and G issue

- Climate change adaptation
- Contamination
- Energy efficiency
- Energy supply
- Flooding
- GHG emissions
- Indoor environmental quality
- Natural hazards
- Resilience
- Transportation
- Water efficiency
- Waste management
- Water supply
- Other
- Other

Description [OPTIONAL]

Availability of energy efficiency certification

List up to three typical examples per E, S and G issue

- Climate change adaptation
  - Contamination
  - Energy efficiency
  - Energy supply
  - Flooding
  - GHG emissions
  - Indoor environmental quality
  - Natural hazards
  - Resilience
  - Transportation
  - Water efficiency
  - Waste management
  - Water supply
  - Other
  - Other
- Social

List up to three typical examples per E, S and G issue

- Building safety and materials
- Health, safety and wellbeing
- Socio-economic
- Accessibility
- Affordable Housing
- Occupier Satisfaction
- Other
- Other
- Other

Description [OPTIONAL]

Distance from public transportation

List up to three typical examples per E, S and G issue

- Building safety and materials
- Health, Safety and wellbeing
- Socio-economic
- Accessibility
- Affordable Housing
- Occupier Satisfaction
- Other
- Other
- Other

Description [OPTIONAL]

Office property is important in a company's SRI profile, e.g. in the service sector

List up to three typical examples per E, S and G issue

- Building safety and materials
  - Health, Safety and wellbeing
  - Socio-economic
  - Accessibility
  - Affordable Housing
  - Occupier Satisfaction
  - Other
  - Other
  - Other
- Governance

List up to three typical examples per E, S and G issue

- Anti-bribery & corruption
- Board structure
- Conflicts of interest
- Governance structure
- Regulatory
- Shareholder structure & rights
- Supply chain governance
- Other
- Other
- Other

List up to three typical examples per E, S and G issue

- Anti-bribery & corruption
- Board structure
- Conflicts of interest
- Governance structure
- Regulatory
- Shareholder structure & rights
- Supply chain governance
- Other
- Other
- Other

List up to three typical examples per E, S and G issue

- Anti-bribery & corruption
- Board structure
- Conflicts of interest
- Governance structure
- Regulatory
- Shareholder structure & rights
- Supply chain governance
- Other
- Other
- Other

Description [OPTIONAL]

Tax regime

No

PR 06	Mandatory	Public	Core Assessed	PRI 1
-------	-----------	--------	---------------	-------

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

<b>PR 06.1</b>	Indicate if ESG issues impacted your property investment selection process during the reporting year.
----------------	---

- ESG issues helped identify risks and/or opportunities for value creation
- ESG issues led to the abandonment of potential investments
- ESG issues impacted the investment in terms of price offered and/or paid
- ESG issues impacted the terms in the shareholder/purchase agreements and/or lending covenants
- ESG issues were considered but did not have an impact on the investment selection process
- Other, specify
- Not applicable, our organisation did not select any investments in the reporting year
- We do not track this potential impact

<b>PR 06.2</b>	Indicate how ESG issues impacted your property investment deal structuring processes during the reporting year.
----------------	---

- ESG issues impacted the investment in terms of price offered and/or paid
- ESG issues impacted the terms in the shareholder/purchase agreements and/or lending covenants
- ESG issues were considered but did not have an impact on the deal structuring process
- Other, specify
- Not applicable, our organisation did not select any investments in the reporting year
- We do not track this potential impact

### Selection, appointment and monitoring third-party property managers

PR 07	Mandatory	Public	Core Assessed	PRI 4
-------	-----------	--------	---------------	-------

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

<b>PR 07.1</b>	Indicate if your organisation includes ESG issues in your selection, appointment and/or monitoring of third-party property managers.
----------------	--

Yes

<b>PR 07.2</b>	Indicate how your organisation includes ESG issues in your selection, appointment and/or monitoring of third party property managers.
----------------	---

- Selection process of property managers incorporated ESG issues

#### Types of actions

- Request explanation of how ESG is effectively integrated, including inquiries about governance and processes
- Request track records and examples of how the manager implements ESG in their asset and property management
- Discuss property level out-performance opportunities through greater integration of ESG criteria
- Request explanation of engaging stakeholders on ESG issues
- Other, explain

#### Coverage

- >75% to 100%
  - >50% to 75%
  - >25% to 50%
  - >0% to 25%
- Contractual requirements when appointing property managers includes ESG issues

#### Types of actions

- Include clear and detailed expectations for incorporating ESG
- Require dedicated ESG procedures in all relevant asset and property management phases
- Clear ESG reporting requirements
- Clear ESG performance targets
- Other, explain

#### Coverage

- >75% to 100%
  - >50% to 75%
  - >25% to 50%
  - >0% to 25%
- Monitoring of property managers covers ESG responsibilities and implementation

#### Types of actions

- Performance against quantitative and material environmental / resource targets over specified timeframe.
- Performance against quantitative and material environmental / resource targets against relevant benchmarks
- Performance against quantitative and qualitative targets to address social impacts of the portfolio/investment,
- Other, explain

Coverage

- >75% to 100%
- >50% to 75%
- >25% to 50%
- >0% to 25%

No

**PR 07.3** Provide a brief description of your organisations selection, appointment and monitoring of third party property managers and how they contribute to the management of ESG issues for your property investments.

SEDCO Capital (SC) expects third-party managers to disclose how they integrate ESG into their investment decisions and the competence and drivers for their staff to incorporate ESG considerations. SC believes that a manager's ESG approach can be an important contribution to its overall value creation.

SC may assess the following aspects:

- If the manager has a structured approach to managing ESG risks and opportunities.
- Transparency: access to ESG information, scope of information, quality of ESG information.
- Ability to mitigate ESG risks: risk exposure assessment, adhesion to ESG policies and implementation, ESG characteristics, presence of quantified and dated targets, ESG performance, and trend.
- The news flow: controversial news, reputational risk.

SC promotes responsible investment to existing managers that do not yet adhere to responsible investment principles. SC annually reviews the manager's processes.

This analysis is documented in the investment research and due diligence memos. Investment decisions should consider this documentation.

Post-investment (monitoring and active ownership)

Overview

PR 08	Mandatory	Public	Gateway	PRI 2
-------	-----------	--------	---------	-------

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

**PR 08.1** Indicate if your organisation, and/or property managers, considers ESG issues in post-investment activities relating to your property assets.

Yes

**PR 08.2** Indicate whether your organisation, and/or property managers, considers ESG issues in the following post-investment activities relating to your property assets.

- We consider ESG issues in property monitoring and management
- We consider ESG issues in property developments and major renovations.
- We consider ESG issues in property occupier engagements
- We consider ESG issues in community engagements related to our properties
- We consider ESG issues in other post-investment activities, specify

See PR 08.3.

**PR 08.3** Describe how your organisation, and/or property managers, considers ESG issues in post-investment activities related to your property assets.

The review of ESG aspects is typically part of SC's post-investment activities such as a property's business or value-add plan. SC considers environmental responsibility once renovation needs arise such as LED lighting, improving isolation, motion sensors and similar applications to reduce energy consumption.

No

**Property monitoring and management**

<b>PR 09</b>	<b>Mandatory</b>	<b>Public</b>	<b>Core Assessed</b>	<b>PRI 2,3</b>
--------------	------------------	---------------	----------------------	----------------

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

**PR 09.1** Indicate the proportion of property assets for which your organisation, and/or property managers, set and monitored ESG targets (KPIs or similar) during the reporting year.

- >90% of property assets
- 51-90% of property assets
- 10-50% of property assets
- <10% of property assets

(in terms of number of property assets)

**PR 09.2** Indicate which ESG targets your organisation and/or property managers typically set and monitor

- Environmental

Target/KPI	Progress Achieved
Availability of energy efficiency certification	Achieved

- Social
- Governance
- We do not set and/or monitor against targets

## Property developments and major renovations

PR 11	Mandatory	Public	Core Assessed	PRI 2
-------	-----------	--------	---------------	-------

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

PR 11.1	Indicate the proportion of active property developments and major renovations where ESG issues have been considered.
---------	--

- >90% of active developments and major renovations
- 51-90% of active developments and major renovations
- 10-50% of active developments and major renovations
- <10% of active developments and major renovations
- N/A, no developments and major renovations of property assets are active

(by number of active property developments and refurbishments)

PR 11.2	Indicate if the following ESG considerations are typically implemented and monitored in your property developments and major renovations.
---------	---

- Environmental site selection requirements
- Environmental site development requirements
- Sustainable construction materials
- Water efficiency requirements
- Energy efficiency requirements
- Energy generation from on-site renewable sources
- Waste management plans at sites
- Health and safety management systems at sites
- Construction contractors comply with sustainability guidelines
- Resilient building design and orientation
- Other, specify

## Occupier engagement

PR 12	Mandatory	Public	Core Assessed	PRI 2
-------	-----------	--------	---------------	-------

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

<b>PR 12.1</b>	Indicate the proportion of property occupiers your organisation, and/or your property managers, engaged with on ESG issues during the reporting year.
----------------	---

- >90% of occupiers
- 50-90% of occupiers
- 10-50% of occupiers
- <10% of occupiers

(in terms of number of occupiers)

<b>PR 12.2</b>	Indicate if the following practises and areas are typically part of your, and/or your property managers', occupier engagements.
----------------	---

- Distribute a sustainability guide to occupiers
- Organise occupier events focused on increasing sustainability awareness
- Deliver training on energy and water efficiency
- Deliver training on waste minimisation
- Provide feedback on energy and water consumption and/or waste generation
- Provide feedback on waste generation
- Carry out occupier satisfaction surveys
- Offer green leases
- Other, specify

<b>PR 13</b>	<b>Mandatory</b>	<b>Public</b>	<b>Additional Assessed</b>	<b>PRI 2</b>
--------------	------------------	---------------	----------------------------	--------------

<b>PR 13.1</b>	Indicate the proportion of all leases signed during the reporting year that used green leases or the proportion of Memoranda of Understandings (MoUs) with reference to ESG issues.
----------------	---

- >90% of leases or MoUs
- 50-90% of leases or MoUs
- 10-50% of leases or MoUs
- <10% of leases or MoUs
- 0% of leases or MoUs
- N/A, no leases or MoUs were signed during the reporting year

(in terms of number of leases or MoUs)

# SEDCO Capital

## Reported Information

### Public version

### Assurance

## PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

## Assurance

CM 1 01.1	Mandatory	Public	Core Assessed	General
-----------	-----------	--------	---------------	---------

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

CM 1 01.1	Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:
-----------	---

- Third party assurance over selected responses from this year's PRI Transparency Report
- Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year
- Third party assurance or audit of the implementation of RI processes (that have been reported to the PRI this year)
- 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)
- Internal verification of responses before submission to the PRI (e.g. by the CEO or the board)
  - Whole PRI Transparency Report has been internally verified
  - Selected data has been internally verified
- Other, specify
- None of the above

CM 1 01.2 & 01.8	Mandatory	Public	Descriptive	
------------------	-----------	--------	-------------	--

CM 1 01.2	Do you plan to conduct third party assurance of this year's PRI Transparency report?
-----------	--

- Whole PRI Transparency Report will be assured
- Selected data will be assured
- We do not plan to assure this year's PRI Transparency report

CM 1 01.3 & 01.9	Mandatory	Public	Descriptive	General
------------------	-----------	--------	-------------	---------

CM 1 01.3	We undertook third party assurance on last year's PRI Transparency Report
-----------	---

- Whole PRI Transparency Report was assured last year
- Selected data was assured in last year's PRI Transparency Report
- We did not assure last year's PRI Transparency report, or we did not have such a report last year.

CM 1 01.4, 10-12	Mandatory	Public	Descriptive	General
------------------	-----------	--------	-------------	---------

CM 1 01.4

We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:

- We adhere to an RI certification or labelling scheme
- We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report
- ESG audit of holdings
- Other, specify  
Internal and external audit reviews
- None of the above

CM 1 01.7

Mandatory

Public

Descriptive

General

CM 1 01.7

Indicate who has reviewed/verified internally the whole - or selected data of the - PRI Transparency Report . and if this applies to selected data please specify what data was reviewed

**Who has conducted the verification**

- CEO or other Chief-Level staff

Sign-off or review of responses

- Sign-off
- Review of responses

What data has been verified

- Policies
- Overarching strategy and processes
- Asset class specific processes
- Quantitative data related to RI processes
- Other

Relevant modules

- Organisational Overview

Corresponding Indicator number

entire section

- Strategy and Governance

Corresponding Indicator number

entire section

- Indirect – Manager Selection, Appointment and Monitoring

Corresponding Indicator number

entire section

- Direct - Listed Equity Incorporation

Corresponding Indicator number

entire section

- Direct - Listed Equity Active Ownership

Corresponding Indicator number

entire section

- Direct – Private Equity

Corresponding Indicator number

entire section

- Direct - Property

Corresponding Indicator number

entire section

- The Board
- Investment Committee
- Compliance Function
- RI/ESG Team
- Investment Teams

What data has been verified

- Policies
- Overarching strategy and processes
- Asset class specific processes
- Quantitative data related to RI processes
- Other

Relevant modules

- Organisational Overview
- Strategy and Governance
- Indirect – Manager Selection, Appointment and Monitoring

Corresponding Indicator number

entire section

Direct - Listed Equity Incorporation

Corresponding Indicator number

entire section

Direct - Listed Equity Active Ownership

Corresponding Indicator number

entire section

Direct – Private Equity

Corresponding Indicator number

entire section

Direct - Property

Corresponding Indicator number

entire section

Legal Department

What data has been verified

- Policies
- Overarching strategy and processes
- Asset class specific processes
- Quantitative data related to RI processes
- Other

Relevant modules

Organisational Overview

Corresponding Indicator number

entire section

Strategy and Governance

Corresponding Indicator number

entire section

Indirect – Manager Selection, Appointment and Monitoring

Corresponding Indicator number

entire section

Direct - Listed Equity Incorporation

	Corresponding Indicator number
--	--------------------------------

entire section

Direct - Listed Equity Active Ownership

	Corresponding Indicator number
--	--------------------------------

entire section

Direct – Private Equity

	Corresponding Indicator number
--	--------------------------------

entire section

Direct - Property

	Corresponding Indicator number
--	--------------------------------

entire section

Other (specify)

<b>CM 1</b> <b>01.13</b>	Additional information for all confidence building measures [OPTIONAL]
-----------------------------	--

**SEDCO Capital Disclaimer**

Whilst the information in this document is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented and no responsibility or liability can be accepted by SEDCO Capital for any error or omission.