



PUBLIC TRANSPARENCY REPORT

2024

Ameris S.A.

Generated 25-11-2024

About this report

PRI reporting is the largest global reporting project on responsible investment. It was developed with investors, for investors.

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

The public Transparency Reports, which are produced using signatories' reported information, provide accountability and support signatories to have internal discussions about their practices and to discuss these with their clients, beneficiaries, and other stakeholders.

This public Transparency Report is an export of the signatory's responses to the PRI Reporting Framework during the 2024 reporting period. It includes the signatory's responses to core indicators, as well as responses to plus indicators that the signatory has agreed to make public.

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

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

Disclaimers

Legal Context

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

Responsible investment definitions

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

Data accuracy

This document presents information reported directly by signatories in the 2024 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented. The PRI has taken reasonable action to ensure that data submitted by signatories in the reporting tool is reflected in their official PRI reports accurately. However, it is possible that small data inaccuracies and/or gaps remain, and the PRI shall not be responsible or liable for such inaccuracies and gaps.

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SENIOR LEADERSHIP STATEMENT (SLS)

SENIOR LEADERSHIP STATEMENT

SENIOR LEADERSHIP STATEMENT

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

Section 1. Our commitment

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

Our approach to sustainability is deeply rooted in our ability as a company to create value now and in the future. We firmly believe that this value creation transcends mere economic gains and must encompass social and environmental dimensions as well. This holistic perspective drives us to engage in responsible investment as a means to achieve comprehensive value creation across these three dimensions: economic, social, and environmental.

While our commitment to sustainability and responsible investment is unwavering, we also recognize the paramount importance of investment profitability. Our approach ensures that financial returns are not sacrificed in the pursuit of Environmental, Social, and Governance (ESG) goals. Instead, we believe that integrating ESG factors enhances the long-term performance and resilience of our investments, leading to sustainable and profitable outcomes for our clients.

Overall Approach to Responsible Investment

We engage in responsible investment because we view it as essential for effective risk management and long-term value creation for our clients. Incorporating ESG factors into our investment processes allows us to align our investments with the broader objectives of society, thereby contributing positively to sustainable development.

Our primary approach to responsible investment is through integration. We seek to incorporate ESG matters both in the initial investment analysis and in their subsequent monitoring. This ensures that our investment decisions are well-informed and take into account all relevant factors that might impact the long-term success of our investments.

In addition to ESG integration, our approach includes the development of impact investment funds and thematic funds that are aligned with the United Nations Sustainable Development Goals (SDGs). These funds are designed to generate positive social and environmental impacts alongside financial returns, thereby addressing critical global challenges.

Regarding exclusions of sectors or industries, we have currently chosen not to define filters in our investment universe. Instead, we address different ESG factors specific to each investment and asset class. This approach acknowledges that not all factors hold the same relevance across industries, and it necessitates the use of tailored procedures for different asset classes.

We have defined five minimum corporate governance topics that are cross-cutting to all investment evaluations. For social and environmental aspects, we use the Sustainability Accounting Standards Board (SASB) standards as our reference, ensuring that our assessments are comprehensive and consistent.

Responsible Investment Commitments

- ESG Integration: We have embedded ESG considerations into our investment processes to manage risks and identify opportunities that contribute to long-term value creation.

- **Impact and Thematic Funds:** We continue to develop funds focused on impact investing and thematic areas aligned with the SDGs. These funds aim to address specific social and environmental challenges while delivering financial returns.
- **Active Stewardship:** We engage actively with our investments to enhance their ESG performance through dialogue and collaborative efforts, focusing on areas with potential for significant improvement.
- **Corporate Governance:** We adhere to five minimum corporate governance topics across all investments, reinforcing our commitment to robust governance practices.
- **Employee Engagement:** We cultivate a culture of sustainability excellence, encouraging employee involvement in ESG seminars and forums to deepen their commitment and understanding.
- **ESG Metrics and Reporting:** Committed to transparency, we continually refine our ESG methodologies and set targets to enhance our sustainability impact.
- **SASB Standards:** We use SASB standards for social and environmental aspects, ensuring our assessments are rigorous and aligned with industry best practices.
- **SDGs:** Our impact and thematic funds are aligned with the SDGs to address key global social and environmental challenges.
- **Collaborative Initiatives:** We participate in various sustainable investment initiatives and alliances, including Asociación Chilena de Administradoras de Fondos de Inversión (ACAFI) and the Global Steering Group for Impact Investment (GSG Chile), to promote sustainable practices across the industry.

Through these commitments and our comprehensive approach to responsible investment, we aim to create sustained value that benefits not only our clients but also society and the environment at large.

Section 2. Annual overview

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

During the reporting year, our most notable achievement has been the substantial increase in assets under management that incorporate Environmental, Social, and Governance (ESG) criteria, now accounting for a significant portion of our total managed assets (73%). This progress is a testament to our dedicated efforts in refining our ESG integration and active stewardship, demonstrating our commitment to not only achieving financial returns but also making a positive impact on society and the environment.

Our organization made significant strides in the realm of responsible investment, focusing on several key areas that are highly material to our operations and asset management:

- Refinement of ESG Analysis and Incorporation:

We have systematically enhanced our ESG analysis by integrating sustainability considerations into our investment decisions. This involves a meticulous evaluation of ESG factors that hold financial materiality, ensuring risk mitigation and improved returns. We have also refined our approach by aligning with international standards and engaging in periodic reviews with the managers of the entities we have invested in.

- Stewardship Activities with Investees:

Our stewardship practices are designed to influence positive changes in the companies we invest in. Through active dialogue and engagement, we focus on companies with significant potential for ESG improvement, thereby fostering long-term value creation. This approach also includes collaborative engagements where we join forces with other investors to enhance the impact of our stewardship activities.

- Collaborative Engagements:

We actively participate in industry-wide initiatives to promote sustainable investment practices. This includes our leadership roles in organizations such as the Asociación Chilena de Administradoras de Fondos de Inversión (ACAFI) and the Global Steering Group for Impact Investment (GSG Chile), where we work collaboratively to drive the sustainability agenda forward.

- Attainment of Responsible Investment Certifications and/or Awards:

Our commitment to responsible investment is further underscored by our adherence to the Principles for Responsible Investment (PRI). All the fund managers for the feeder funds we distribute are PRI signatories, reflecting our dedication to upholding the highest standards of responsible investment practices.

These initiatives and achievements reflect our ongoing commitment to responsible investment, aligning our operational strategies with broader societal and environmental goals.

Section 3. Next steps

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

To advance our commitment to responsible investment over the next two years, our organization has outlined several specific steps:

- Maintaining Environmental, Social, and Governance (ESG) Coverage: We are dedicated to maintaining at least 60% of our Assets Under Management covered with ESG criteria, ensuring that a significant portion of our portfolio adheres to rigorous sustainability standards.
- Further Development of ESG Methodologies: We plan to enhance our ESG analysis methodologies, focusing on a deeper integration with the Sustainable Development Goals (SDGs). This will involve refining our internal ESG tracking indicators to better assess and report our impact on these global objectives.

- **Expansion of Collaborative Initiatives:** We aim to extend our participation in collaborative initiatives within the investment community. We will continue our active involvement in organizations such as the Asociación Chilena de Administradoras de Fondos de Inversión (ACAFI) and the Global Steering Group for Impact Investment (GSG Chile), contributing to sustainability committees and advisory councils.
- **Incorporation of ESG in Investment Processes:** We are committed to systematically incorporating ESG considerations into all aspects of our investment analysis and management processes. This will ensure that responsible investment practices are consistently applied across all our business lines and investment decisions.
- **Enhanced ESG Reporting:** We plan to increase ESG reporting through our funds, providing more detailed and frequent updates on how ESG factors are integrated into our investment strategies and the impacts achieved.

These strategic steps are designed to strengthen our leadership in responsible investment and set new benchmarks for sustainability in the financial industry.

Section 4. Endorsement

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

Name

Ignacio Montane

Position

CEO

Organisation's Name

Ameris S.A.

☒ **A**

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

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ORGANISATIONAL OVERVIEW (OO)

ORGANISATIONAL INFORMATION

REPORTING YEAR

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

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

	Date	Month	Year
Year-end date of the 12-month period for PRI reporting purposes:	31	12	2023

SUBSIDIARY INFORMATION

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

Does your organisation have subsidiaries?

- ☐ (A) Yes
- ☒ (B) No

ASSETS UNDER MANAGEMENT

ALL ASSET CLASSES

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

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

USD

(A) AUM of your organisation, including subsidiaries, and excluding the AUM subject to execution, advisory, custody, or research advisory only

US\$ 1,786,000,000.00

(B) AUM of subsidiaries that are PRI signatories in their own right and excluded from this submission, as indicated in [OO 2.2]

US\$ 0.00

(C) AUM subject to execution, advisory, custody, or research advisory only

US\$ 0.00

ASSET BREAKDOWN

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

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

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

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

We manage 8 feeder funds encompassing various strategies and 2 secondary funds in alternative assets.

ASSET BREAKDOWN: INTERNALLY MANAGED LISTED EQUITY

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

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

(A) Passive equity >10-50%

(B) Active – quantitative 0%

(C) Active – fundamental >10-50%

(D) Other strategies 0%

ASSET BREAKDOWN: INTERNALLY MANAGED FIXED INCOME

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

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

(A) Passive – SSA 0%

(B) Passive – corporate 0%

(C) Active – SSA 0%

(D) Active – corporate >0-10%

(E) Securitised 0%

(F) Private debt >75%

ASSET BREAKDOWN: INTERNALLY MANAGED PRIVATE EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 PE	CORE	OO 5	N/A	PUBLIC	Asset breakdown: Internally managed private equity	GENERAL

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

(A) Venture capital 0%

(B) Growth capital >0-10%

(C) (Leveraged) buy-out 0%

(D) Distressed, turnaround or
special situations 0%

(E) Secondaries 0%

(F) Other >75%

(F) Other - Specify:

99.1% We offer investment vehicle structuring services for international private equity firms

0.4% Two impact investment funds

ASSET BREAKDOWN: INTERNALLY MANAGED REAL ESTATE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 RE	CORE	OO 5	N/A	PUBLIC	Asset breakdown: Internally managed real estate	GENERAL

Provide a further breakdown of your internally managed real estate AUM.

(A) Retail >10-50%

(B) Office >0-10%

(C) Industrial >10-50%

(D) Residential	>10-50%
(E) Hotel	0%
(F) Lodging, leisure and recreation	0%
(G) Education	0%
(H) Technology or science	0%
(I) Healthcare	0%
(J) Mixed use	0%
(K) Other	>10-50%

(K) Other - Specify:

8% real estate financing
2.7% housing development
0.3% Coinvestments for second home developments, among others.

ASSET BREAKDOWN: INTERNALLY MANAGED INFRASTRUCTURE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 INF	CORE	OO 5	N/A	PUBLIC	Asset breakdown: Internally managed infrastructure	GENERAL

Provide a further breakdown of your internally managed infrastructure AUM.

(A) Data infrastructure	0%
(B) Diversified	0%
(C) Energy and water resources	>75%
(D) Environmental services	0%
(E) Network utilities	0%
(F) Power generation (excl. renewables)	0%

(G) Renewable power	0%
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(H) Social infrastructure	0%
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(I) Transport	0%
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(J) Other	0%
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GEOGRAPHICAL BREAKDOWN

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

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

AUM in Emerging Markets and Developing Economies

(A) Listed equity	(12) 100%
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(C) Fixed income – corporate	(12) 100%
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(E) Fixed income – private debt	(12) 100%
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(F) Private equity	(12) 100%
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(G) Real estate	(11) >90 to <100%
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(H) Infrastructure	(12) 100%
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STEWARDSHIP

STEWARDSHIP

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

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

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

STEWARDSHIP: (PROXY) VOTING

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

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

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

STEWARDSHIP NOT CONDUCTED

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 10	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship not conducted	2

Describe why your organisation does not currently conduct stewardship and/or (proxy) voting.

Stewardship, excluding (proxy) voting

(A) Listed equity – active

We do not currently conduct stewardship considering the small size of our Funds relative to the floating stake of its underlying assets.

(B) Listed equity – passive

We do not currently conduct stewardship considering the small size of our Funds relative to the floating stake of its underlying assets.

(Proxy) voting

(L) Listed equity – active

We do not currently conduct (proxy) voting considering the small size of our Funds relative to the floating stake of its underlying assets.

(M) Listed equity – passive

We do not currently conduct (proxy) voting considering the small size of our Funds relative to the floating stake of its underlying assets.

ESG INCORPORATION

INTERNALLY MANAGED ASSETS

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

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

	(1) Yes, we incorporate ESG factors into our investment decisions	(2) No, we do not incorporate ESG factors into our investment decisions
(A) Listed equity - passive	☒	☐
(C) Listed equity - active - fundamental	☒	☐
(F) Fixed income - corporate	☒	☐
(H) Fixed income - private debt	☒	☐
(I) Private equity	☒	☐
(J) Real estate	☒	☐
(K) Infrastructure	☒	☐
(V) Other: We manage 8 feeder funds encompassing various strategies and 2 secondary funds in alternative assets.	☒	☐

ESG IN OTHER ASSET CLASSES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 15	CORE	OO 11, OO 12–14	N/A	PUBLIC	ESG in other asset classes	1

Describe how your organisation incorporates ESG factors into the following asset classes.

Internally managed
(C) Other

Incorporation of ESG Factors into Feeder and Secondary Funds: Our investment in feeder and secondary funds is aligned with international ESG standards and guidelines, such as the Principles for Responsible Investment (PRI). We assess the fund managers' adherence to ESG criteria as part of the due diligence process. We review the ESG policies, practices, and if they are either signatories to PRI or adhere to comparable ESG standards.

ESG STRATEGIES

LISTED EQUITY

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

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

Percentage out of total internally managed active listed equity

(A) Screening alone	0%
(B) Thematic alone	0%
(C) Integration alone	0%
(D) Screening and integration	0%
(E) Thematic and integration	>75%
(F) Screening and thematic	0%
(G) All three approaches combined	0%

(H) None 0%

FIXED INCOME

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

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

(2) Fixed income - corporate

(A) Screening alone	0%
(B) Thematic alone	0%
(C) Integration alone	>75%
(D) Screening and integration	0%
(E) Thematic and integration	0%
(F) Screening and thematic	0%
(G) All three approaches combined	0%
(H) None	0%

ESG/SUSTAINABILITY FUNDS AND PRODUCTS

LABELLING AND MARKETING

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

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

- ☒ (A) Yes, we market products and/or funds as ESG and/or sustainable

Provide the percentage of AUM that your ESG and/or sustainability-marketed products or funds represent:

>0-10%

- (B) No, we do not offer products or funds explicitly marketed as ESG and/or sustainable
- (C) Not applicable; we do not offer products or funds

Additional information: (Voluntary)

The thematic investment strategy also include our impact investment funds, each of which has been supplemented with a sustainability strategy based on the principles established in our Guide for Thematic Funds.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18.1	CORE	OO 18	OO 18.2	PUBLIC	Labelling and marketing	1

Do any of your ESG and/or sustainability-marketed products and/or funds hold formal ESG and/or RI certification(s) or label(s) awarded by a third party?

- **(A) Yes, our ESG and/or sustainability-marketed products and/or funds hold formal labels or certifications**

Provide the percentage of AUM that your labelled and/or certified products and/or funds represent:

>0-10%

- (B) No, our ESG and/or sustainability-marketed products and/or funds do not hold formal labels or certifications

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18.2	CORE	OO 18.1	N/A	PUBLIC	Labelling and marketing	1

Which ESG/RI certifications or labels do you hold?

- ☐ (A) Commodity type label (e.g. BCI)
- ☐ (B) GRESB
- ☐ (C) Austrian Ecolabel (UZ49)
- ☒ **(D) B Corporation**
- ☐ (E) BREEAM
- ☐ (F) CBI Climate Bonds Standard
- ☐ (G) DDV-Nachhaltigkeitskodex-ESG-Strategie
- ☐ (H) DDV-Nachhaltigkeitskodex-ESG-Impact
- ☐ (I) EU Ecolabel
- ☐ (J) EU Green Bond Standard
- ☐ (K) Febelfin label (Belgium)
- ☐ (L) Finansol
- ☐ (M) FNG-Siegel Ecolabel (Germany, Austria and Switzerland)
- ☐ (N) Greenfin label (France)
- ☐ (O) Grüner Pfandbrief
- ☐ (P) ICMA Green Bond Principles
- ☐ (Q) ICMA Social Bonds Principles
- ☐ (R) ICMA Sustainability Bonds Principles
- ☐ (S) ICMA Sustainability-linked Bonds Principles
- ☐ (T) Kein Verstoß gegen Atomwaffensperrvertrag
- ☐ (U) Le label ISR (French government SRI label)
- ☐ (V) Luxflag Climate Finance
- ☐ (W) Luxflag Environment

- ☐ (X) Luxflag ESG
- ☐ (Y) Luxflag Green Bond
- ☐ (Z) Luxflag Microfinance
- ☐ (AA) Luxflag Sustainable Insurance Products
- ☐ (AB) National stewardship code
- ☐ (AC) Nordic Swan Ecolabel
- ☐ (AD) Other SRI label based on EUROSIF SRI Transparency Code (e.g. Novethic)
- ☐ (AE) People's Bank of China green bond guidelines
- ☐ (AF) RIAA (Australia)
- ☐ (AG) Towards Sustainability label (Belgium)
- ☐ (AH) Other

PASSIVE INVESTMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 19	CORE	OO 5.3 FI, OO 11	LE 8, FI 10	PUBLIC	Passive investments	1

What percentage of your total internally managed passive listed equity and/or fixed income passive AUM utilise an ESG index or benchmark?

Percentage of AUM that utilise an ESG index or benchmark

(A) Listed equity - passive	>10-50%
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SUMMARY OF REPORTING REQUIREMENTS

SUMMARY OF REPORTING REQUIREMENTS

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

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

Applicable modules	(1) Mandatory to report (pre-filled based on previous responses)	(2.1) Voluntary to report. Yes, I want to opt-in to reporting on the module	(2.2) Voluntary to report. No, I want to opt-out of reporting on the module
Policy, Governance and Strategy	☒	☐	☐
Confidence Building Measures	☒	☐	☐
(A) Listed equity – passive	☐	☒	☐
(C) Listed equity – active – fundamental	☐	☒	☐
(F) Fixed income – corporate	☐	☒	☐
(H) Fixed income – private debt	☒	☐	☐
(I) Private equity	☒	☐	☐
(J) Real estate	☒	☐	☐
(K) Infrastructure	☐	☒	☐

OTHER ASSET BREAKDOWNS

PRIVATE EQUITY: SECTORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 22	CORE	OO 21	N/A	PUBLIC	Private equity: Sectors	GENERAL

In which sector(s) are your internally managed private equity assets invested?

- ☒ (A) Energy
- ☐ (B) Materials
- ☒ (C) Industrials
- ☒ (D) Consumer discretionary
- ☐ (E) Consumer staples
- ☐ (F) Healthcare
- ☐ (G) Financials
- ☐ (H) Information technology
- ☐ (I) Communication services
- ☐ (J) Utilities
- ☐ (K) Real estate

PRIVATE EQUITY: OWNERSHIP LEVEL

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 23	CORE	OO 21	N/A	PUBLIC	Private equity: Ownership level	GENERAL

What is the percentage breakdown of your internally managed private equity investments by the level of ownership?

- ☒ (A) A majority stake (more than 50%)
 - Select from the list:
 - ☐ (1) >0 to 10%
 - ☐ (2) >10 to 50%
 - ☐ (3) >50 to 75%
 - ☒ (4) >75%
- ☒ (B) A significant minority stake (between 10–50%)
 - Select from the list:
 - ☒ (1) >0 to 10%
 - ☐ (2) >10 to 50%
- ☐ (C) A limited minority stake (less than 10%)

REAL ESTATE: BUILDING TYPE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 24	CORE	OO 21	RE 1, RE 9 - 10	PUBLIC	Real estate: Building type	GENERAL

What is the building type of your physical real estate assets?

- ☒ (A) Standing investments
- ☒ (B) New construction
- ☐ (C) Major renovation

REAL ESTATE: OWNERSHIP LEVEL

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 25	CORE	OO 21	N/A	PUBLIC	Real estate: Ownership level	GENERAL

What is the percentage breakdown of your physical real estate assets by the level of ownership?

- ☒ (A) A majority stake (more than 50%)
 - Select from the list:
 - ☐ (1) >0 to 10%
 - ☐ (2) >10 to 50%
 - ☒ (3) >50 to 75%
 - ☐ (4) >75%
- ☒ (B) A significant minority stake (between 10–50%)
 - Select from the list:
 - ☐ (1) >0 to 10%
 - ☒ (2) >10 to 50%
- ☐ (C) A limited minority stake (less than 10%)

REAL ESTATE: MANAGEMENT TYPE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 26	CORE	OO 21	RE 1, RE 6–8, RE 13	PUBLIC	Real estate: Management type	GENERAL

Who manages your physical real estate assets?

- ☐ (A) Direct management by our organisation
- ☒ (B) Third-party property managers that our organisation appoints
- ☒ (C) Other investors or their third-party property managers
- ☐ (D) Tenant(s) with operational control

INFRASTRUCTURE: OWNERSHIP LEVEL

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 27	CORE	OO 21	N/A	PUBLIC	Infrastructure: Ownership level	GENERAL

What is the percentage breakdown of your organisation's infrastructure assets by the level of ownership?

- ☐ (A) A majority stake (more than 50%)
- ☒ (B) A significant minority stake (between 10–50%)
- Select from the list:
- ☐ (1) >0 to 10%
 - ☐ (2) >10 to 50%
 - ☐ (3) >50 to 75%
 - ☒ (4) >75%
- ☐ (C) A limited minority stake (less than 10%)

INFRASTRUCTURE: STRATEGY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 28	CORE	OO 21	N/A	PUBLIC	Infrastructure: Strategy	GENERAL

What is the investment strategy for your infrastructure assets?

- ☒ (A) Core
- ☐ (B) Value added
- ☐ (C) Opportunistic
- ☐ (D) Other

INFRASTRUCTURE: TYPE OF ASSET

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 29	CORE	OO 21	INF 1	PUBLIC	Infrastructure: Type of asset	GENERAL

What is the asset type of your infrastructure?

- ☐ (A) Greenfield
- ☒ (B) Brownfield

INFRASTRUCTURE: MANAGEMENT TYPE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 30	CORE	OO 21	Multiple, see guidance	PUBLIC	Infrastructure: Management type	GENERAL

Who manages your infrastructure assets?

- ☐ (A) Direct management by our organisation
- ☐ (B) Third-party infrastructure operators that our organisation appoints
- ☒ (C) Other investors, infrastructure companies or their third-party operators
- ☐ (D) Public or government entities or their third-party operators

SUBMISSION INFORMATION

REPORT DISCLOSURE

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

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

- ☐ (A) Publish as absolute numbers
- ☒ (B) Publish as ranges

POLICY, GOVERNANCE AND STRATEGY (PGS)

POLICY

RESPONSIBLE INVESTMENT POLICY ELEMENTS

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

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

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

Specify:

The policy includes training for directors and ESG focal points, promotion of sustainable investment practices internally and externally, and transparent reporting of sustainability and responsible investment activities.

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

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

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

- ☒ (A) Specific guidelines on climate change (may be part of guidelines on environmental factors)
- ☐ (B) Specific guidelines on human rights (may be part of guidelines on social factors)
- ☒ (C) Specific guidelines on other systematic sustainability issues

Specify:

The policy broadly integrates sustainability into its investment analysis and decision-making processes, indicating a systemic approach to sustainability that includes various ESG factors. This likely covers a range of sustainability issues beyond just environmental and social factors, such as economic sustainability and governance.

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

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

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

☒ **(A) Overall approach to responsible investment**

Add link:

<https://amerisdocs-prod.s3.amazonaws.com/Sostenibilidad/Pol%C3%ADtica+de+Sostenibilidad/Pol%C3%ADtica+de+Sostenibilidad+Ameris+v4.0.pdf>

☒ **(B) Guidelines on environmental factors**

Add link:

<https://amerisdocs-prod.s3.amazonaws.com/Sostenibilidad/Pol%C3%ADtica+de+Sostenibilidad/Pol%C3%ADtica+de+Sostenibilidad+Ameris+v4.0.pdf>

☒ **(C) Guidelines on social factors**

Add link:

<https://amerisdocs-prod.s3.amazonaws.com/Sostenibilidad/Pol%C3%ADtica+de+Sostenibilidad/Pol%C3%ADtica+de+Sostenibilidad+Ameris+v4.0.pdf>

☒ **(D) Guidelines on governance factors**

Add link:

<https://amerisdocs-prod.s3.amazonaws.com/Sostenibilidad/Pol%C3%ADtica+de+Sostenibilidad/Pol%C3%ADtica+de+Sostenibilidad+Ameris+v4.0.pdf>

☒ **(E) Guidelines on sustainability outcomes**

Add link:

<https://amerisdocs-prod.s3.amazonaws.com/Sostenibilidad/Pol%C3%ADtica+de+Sostenibilidad/Pol%C3%ADtica+de+Sostenibilidad+Ameris+v4.0.pdf>

☒ **(F) Specific guidelines on climate change (may be part of guidelines on environmental factors)**

Add link:

<https://amerisdocs-prod.s3.amazonaws.com/Sostenibilidad/Pol%C3%ADtica+de+Sostenibilidad/Pol%C3%ADtica+de+Sostenibilidad+Ameris+v4.0.pdf>

☒ **(H) Specific guidelines on other systematic sustainability issues**

Add link:

<https://amerisdocs-prod.s3.amazonaws.com/Sostenibilidad/Pol%C3%ADtica+de+Sostenibilidad/Pol%C3%ADtica+de+Sostenibilidad+Ameris+v4.0.pdf>

☒ **(I) Guidelines tailored to the specific asset class(es) we hold**

Add link:

<https://amerisdocs-prod.s3.amazonaws.com/Sostenibilidad/Pol%C3%ADtica+de+Sostenibilidad/Pol%C3%ADtica+de+Sostenibilidad+Ameris+v4.0.pdf>

☒ **(J) Guidelines on exclusions**

Add link:

<https://amerisdocs-prod.s3.amazonaws.com/Sostenibilidad/Pol%C3%ADtica+de+Sostenibilidad/Pol%C3%ADtica+de+Sostenibilidad+Ameris+v4.0.pdf>

☒ **(L) Stewardship: Guidelines on engagement with investees**

Add link:

<https://amerisdocs-prod.s3.amazonaws.com/Sostenibilidad/Pol%C3%ADtica+de+Sostenibilidad/Pol%C3%ADtica+de+Sostenibilidad+Ameris+v4.0.pdf>

☒ **(N) Stewardship: Guidelines on engagement with other key stakeholders**

Add link:

<https://amerisdocs-prod.s3.amazonaws.com/Sostenibilidad/Pol%C3%ADtica+de+Sostenibilidad/Pol%C3%ADtica+de+Sostenibilidad+Ameris+v4.0.pdf>

☒ **(P) Other responsible investment aspects not listed here**

Add link:

<https://amerisdocs-prod.s3.amazonaws.com/Sostenibilidad/Pol%C3%ADtica+de+Sostenibilidad/Pol%C3%ADtica+de+Sostenibilidad+Ameris+v4.0.pdf>

- (Q) No elements of our formal responsible investment policy(ies) are publicly available

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 4	PLUS	PGS 1	N/A	PUBLIC	Responsible investment policy elements	1 – 6

Does your formal responsible investment policy(ies) identify a link between your responsible investment activities and your fiduciary duties or equivalent obligations?

☒ **(A) Yes**

Elaborate:

There is a strong link between responsible investment activities and fiduciary duties, which is further reinforced by several key aspects of our operations:

- **Integration of ESG Factors:** Our policy explicitly defines sustainable investment as incorporating environmental, social, and governance (ESG) issues into investment analysis and asset management. This practice is considered part of Ameris' fiduciary responsibilities, highlighting that addressing these issues is essential for comprehensive risk management and long-term value creation. This approach is aligned with fiduciary duties to act in the best interests of clients and stakeholders.
- **Alignment with Broader Societal Objectives:** By integrating ESG considerations, Ameris aligns its investments with broader societal goals, which enhances the firm's approach to meeting its fiduciary duties by contributing positively to societal welfare and environmental sustainability.
- **Commitment as PRI Signatories:** The commitment to the Principles of Responsible Investment (PRI) and adherence to its guidelines further reinforces the view that responsible investing is a fiduciary duty. The principles advocate for the incorporation of ESG issues into investment decision-making, which Ameris has committed to following.

- Guided by the Corporate Conduct Pillar: The fiduciary duty aspects of our operation are mainly guided by the Corporate Conduct pillar of our Sustainability Policy, in line with our Ethics Code. Ameris maintains a behavior of responsibility and integrity, striving to be a responsible and inclusive employer and client, incorporating Diversity, Equity, and Inclusion criteria in actions; maintaining high standards of corporate governance, aspiring to meet the best industry standards; and minimizing the environmental impact of operations.

- Principles of Transparency and Fairness: Ameris adopts principles of transparency and fairness in the delivery of information to clients and the market. We have established comprehensive policies and procedures aimed at implementing these principles, including a Manual for the Management of Information of Interest to the Market, Policy and Procedure for Advertising and Propaganda, and a Manual of Procedures for Communication with Investors.

These elements collectively demonstrate how Ameris' responsible investment activities are intricately linked to fulfilling fiduciary duties, ensuring that the firm not only adheres to but also leads with principles that protect and advance the interests of its stakeholders.

o (B) No

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

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

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

RESPONSIBLE INVESTMENT POLICY COVERAGE

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

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

Combined AUM coverage of all policy elements

(A) Overall approach to responsible investment	
(B) Guidelines on environmental factors	(7) 100%
(C) Guidelines on social factors	
(D) Guidelines on governance factors	

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

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

AUM coverage

(A) Specific guidelines on climate change	(1) for all of our AUM
(C) Specific guidelines on other systematic sustainability issues	(1) for all of our AUM

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

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

☒ **(B) Fixed income**

(1) Percentage of AUM covered

- ☐ (1) >0% to 10%
- ☐ (2) >10% to 20%
- ☐ (3) >20% to 30%
- ☐ (4) >30% to 40%
- ☐ (5) >40% to 50%
- ☐ (6) >50% to 60%
- ☐ (7) >60% to 70%
- ☐ (8) >70% to 80%
- ☐ (9) >80% to 90%
- ☐ (10) >90% to <100%

☒ **(11) 100%**

☒ **(C) Private equity**

(1) Percentage of AUM covered

- ☐ (1) >0% to 10%
- ☐ (2) >10% to 20%
- ☐ (3) >20% to 30%
- ☐ (4) >30% to 40%
- ☐ (5) >40% to 50%
- ☐ (6) >50% to 60%
- ☐ (7) >60% to 70%
- ☐ (8) >70% to 80%
- ☐ (9) >80% to 90%
- ☐ (10) >90% to <100%

☒ **(11) 100%**

☒ **(D) Real estate**

(1) Percentage of AUM covered

- ☐ (1) >0% to 10%
- ☐ (2) >10% to 20%
- ☐ (3) >20% to 30%
- ☐ (4) >30% to 40%
- ☐ (5) >40% to 50%
- ☐ (6) >50% to 60%
- ☐ (7) >60% to 70%
- ☐ (8) >70% to 80%
- ☐ (9) >80% to 90%
- ☐ (10) >90% to <100%

☒ **(11) 100%**

☒ **(E) Infrastructure**

(1) Percentage of AUM covered

- ☐ (1) >0% to 10%
- ☐ (2) >10% to 20%
- ☐ (3) >20% to 30%
- ☐ (4) >30% to 40%
- ☐ (5) >40% to 50%
- ☐ (6) >50% to 60%
- ☐ (7) >60% to 70%
- ☐ (8) >70% to 80%

- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

☐ (I) Other

GOVERNANCE

ROLES AND RESPONSIBILITIES

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

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

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

Specify:

Chief Executive Officer (CEO)

- ☒ (C) Investment committee, or equivalent

Specify:

Sustainability Committee: It is composed of the CEO of Ameris S.A., a representative of the Board of Ameris S.A., the Director of Sustainable Investments, and the Manager of Sustainable Investments.

- ☒ (D) Head of department, or equivalent

Specify department:

Sustainable Investments

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

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

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

	(1) Board members, trustees, or equivalent	(2) Senior executive-level staff, investment committee, head of department, or equivalent
(A) Overall approach to responsible investment	☒	☒
(B) Guidelines on environmental, social and/or governance factors	☒	☒

(C) Guidelines on sustainability outcomes	☐	☒
(D) Specific guidelines on climate change (may be part of guidelines on environmental factors)	☐	☒
(F) Specific guidelines on other systematic sustainability issues	☐	☒
(G) Guidelines tailored to the specific asset class(es) we hold	☐	☒
(H) Guidelines on exclusions	☐	☒
(J) Stewardship: Guidelines on engagement with investees	☐	☒
(L) Stewardship: Guidelines on engagement with other key stakeholders	☐	☒
(N) This role has no formal oversight over and accountability for any of the above elements covered in our responsible investment policy(ies)	☐	☐

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

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

● (A) Yes

Describe how you do this:

Our organization meticulously debates our positions within our Sustainability Committee, ensuring that all our political engagements are aligned with our commitment to the Principles for Responsible Investment (PRI). Additionally, we have the oversight of our Director of Sustainable Investments who plays a crucial role in overseeing and validating these engagements in Ameris' Board, including those conducted by third parties on our behalf. This governance structure helps us maintain our dedication to sustainability and responsible investment practices in all our political interactions.

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

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

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

☒ **(A) Internal role(s)**

Specify:

In our organization, the Sustainability Committee, Sustainability Director, Director of Sustainable Investments, and Manager of Sustainable Investments are key in implementing our responsible investment approach. Additionally, ESG Focal Points across departments ensure adherence to ESG principles. External advisors also provide expertise in aligning with global standards.

☐ **(B) External investment managers, service providers, or other external partners or suppliers**

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

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

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

☐ **(A) Yes, we use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent**

☒ **(B) No, we do not use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent**

Explain why: (Voluntary)

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

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

☒ **(A) Yes, we use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)**

Indicate whether these responsible investment KPIs are linked to compensation

☐ **(1) KPIs are linked to compensation**

☐ **(2) KPIs are not linked to compensation as these roles do not have variable compensation**

☒ **(3) KPIs are not linked to compensation even though these roles have variable compensation**

Describe: (Voluntary)

We incorporate ESG KPIs into the performance evaluation of the focal points, and into that of the entire team of the Sustainable Investments department.

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

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 15	PLUS	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

What responsible investment competencies do you regularly include in the training of senior-level body(ies) or role(s) in your organisation?

	(1) Board members, trustees or equivalent	(2) Senior executive-level staff, investment committee, head of department or equivalent
(A) Specific competence in climate change mitigation and adaptation	☐	☒
(B) Specific competence in investors' responsibility to respect human rights	☐	☒
(C) Specific competence in other systematic sustainability issues	☒	☒
(D) The regular training of this senior leadership role does not include any of the above responsible investment competencies	☐	☐

EXTERNAL REPORTING AND DISCLOSURES

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

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

- ☐ (A) Any changes in policies related to responsible investment
- ☐ (B) Any changes in governance or oversight related to responsible investment
- ☐ (C) Stewardship-related commitments
- ☐ (D) Progress towards stewardship-related commitments
- ☐ (E) Climate-related commitments
- ☐ (F) Progress towards climate-related commitments
- ☐ (G) Human rights-related commitments
- ☐ (H) Progress towards human rights-related commitments
- ☐ (I) Commitments to other systematic sustainability issues
- ☐ (J) Progress towards commitments on other systematic sustainability issues
- ☒ (K) We do not include any of these elements in our regular reporting to clients and/or beneficiaries for the majority of our AUM

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

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

- ☐ (A) Yes, including all governance-related recommended disclosures
- ☐ (B) Yes, including all strategy-related recommended disclosures
- ☒ (C) Yes, including all risk management-related recommended disclosures
- ☐ (D) Yes, including all applicable metrics and targets-related recommended disclosures
- ☐ (E) None of the above

Add link(s):

<https://amerisdocs-prod.s3.amazonaws.com/Sostenibilidad/Reportes/2023/Memoria%20Integrada%20Anual%20Ameris%20Capital%20AGF%20S.A.%202023.pdf>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 18	PLUS	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, to which international responsible investment standards, frameworks, or regulations did your organisation report?

- ☐ (A) Disclosures against the European Union's Sustainable Finance Disclosure Regulation (SFDR)
- ☐ (B) Disclosures against the European Union's Taxonomy
- ☐ (C) Disclosures against the CFA's ESG Disclosures Standard
- ☒ (D) Disclosures against other international standards, frameworks or regulations

Specify:

It references the standards of the Sustainability Accounting Standards Board (SASB) for the sector "Asset Management and Custody Activities." In the realm of financial accounting information, the information is prepared under International Financial Reporting Standards (IFRS), presenting the data in thousands of Chilean pesos.

Link to example of public disclosures

<https://amerisdocs-prod.s3.amazonaws.com/Sostenibilidad/Reportes/2023/Memoria%20Integrada%20Anual%20Ameris%20Capital%20AGF%20S.A.%202023.pdf>

- ☒ (E) Disclosures against other international standards, frameworks or regulations

Specify:

COSO-WBCSD Enterprise Risk Management Framework

Link to example of public disclosures

<https://amerisdocs-prod.s3.amazonaws.com/Sostenibilidad/Reportes/2023/Memoria%20Integrada%20Anual%20Ameris%20Capital%20AGF%20S.A.%202023.pdf>

- ☒ (F) Disclosures against other international standards, frameworks or regulations

Specify:

Sustainable Development Goals (SDGs)

Link to example of public disclosures

<https://amerisdocs-prod.s3.amazonaws.com/Sostenibilidad/Reportes/2023/Memoria%20Integrada%20Anual%20Ameris%20Capital%20AGF%20S.A.%202023.pdf>

☐ (G) Disclosures against other international standards, frameworks or regulations

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

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

☒ (A) Yes, we publicly disclosed our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement

Add link(s):

<https://amerisdocs-prod.s3.amazonaws.com/Sostenibilidad/Reportes/2023/Memoria%20Integrada%20Anual%20Ameris%20Capital%20AGF%20S.A.%202023.pdf>

☐ (B) No, we did not publicly disclose our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement

☐ (C) Not applicable, we were not members in or supporters of any trade associations, think tanks, or similar bodies that conduct any form of political engagement during the reporting year

STRATEGY

CAPITAL ALLOCATION

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

Which elements do your organisation-level exclusions cover?

☐ (A) Exclusions based on our organisation's values or beliefs regarding particular sectors, products or services

☐ (B) Exclusions based on our organisation's values or beliefs regarding particular regions or countries

☐ (C) Exclusions based on minimum standards of business practice aligned with international norms such as the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, UN Security Council sanctions or the UN Global Compact

☐ (D) Exclusions based on our organisation's climate change commitments

☒ (E) Other elements

Specify:

No Pre-set Exclusions (with Legal Exceptions): The policy explicitly states that there are no exclusions of sectors or industries prior to the evaluation process, except for those exclusions mandated by Chilean legal standards. This approach ensures all opportunities are considered on a case-by-case basis, providing a thorough assessment of their sustainability impacts and alignment with Ameris' investment criteria.

☐ (F) Not applicable; our organisation does not have any organisation-level exclusions

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

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

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

STEWARDSHIP: OVERALL STEWARDSHIP STRATEGY

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

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

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

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 23	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

How does your organisation, or the external service providers or external managers acting on your behalf, prioritise the investees or other entities on which to focus its stewardship efforts?

Regarding stewardship activities, we seek to play an active role by leveraging the powers we have as investors in each asset class, aiming for direct dialogue with companies to improve their ESG outcomes. To this end, we will prioritize those with greater potential for improvement based on our internal ESG evaluation, also considering their role in the portfolio and potential impact. We will also consider it important to participate in collaborative engagement initiatives to maximize the likelihood of success in the dialogue process. In the event that the dialogue process is considered unsuccessful, it must be analyzed by the Sustainability Committee to determine potential scaling measures. As for voting practices, we maintain a passive role, adhering to the requirements of regulations and our Voting Policy, exercising our right to vote mainly at shareholder meetings when the stake is significant (greater than 4%).

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

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

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

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 25	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Rank the channels that are most important for your organisation in achieving its stewardship objectives.

- ☒ (A) Internal resources, e.g. stewardship team, investment team, ESG team, or staff
 - Select from the list:
 - ☒ 1
 - ☐ 4
 - ☐ 5
- ☒ (B) External investment managers, third-party operators and/or external property managers, if applicable
 - Select from the list:
 - ☒ 2
 - ☐ 4
 - ☐ 5
- ☐ (C) External paid specialist stewardship services (e.g. engagement overlay services or, in private markets, sustainability consultants) excluding investment managers, real assets third-party operators, or external property managers
- ☒ (D) Informal or unstructured collaborations with investors or other entities
 - Select from the list:
 - ☒ 3
 - ☐ 4
 - ☐ 5
- ☐ (E) Formal collaborative engagements, e.g. PRI-coordinated collaborative engagements, Climate Action 100+, or similar
- ☐ (F) We do not use any of these channels

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 27	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

How are your organisation's stewardship activities linked to your investment decision making, and vice versa?

Our organization's stewardship activities are intricately linked to our investment decision-making process, reinforcing our commitment to sustainable and responsible investing. This year, we achieved a significant milestone by substantially increasing the portion of our assets under management that incorporate ESG criteria, reflecting our ongoing efforts to refine ESG integration and active stewardship. This progress highlights our dual focus on achieving robust financial returns and exerting a positive impact on society and the environment.

Through targeted dialogue and engagement, we aim to drive long-term value creation. Additionally, we may engage in collaborative efforts with other investors to amplify the impact of our stewardship activities.

STEWARDSHIP: ESCALATION

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

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

- ☐ (A) Joining or broadening an existing collaborative engagement or creating a new one
- ☐ (B) Publicly engaging the entity, e.g. signing an open letter
- ☐ (C) Not investing
- ☐ (D) Reducing exposure to the investee entity
- ☐ (E) Divesting
- ☐ (F) Litigation
- ☐ (G) Other

☒ **(H) In the past three years, we did not use any of the above escalation measures for our corporate fixed income assets**

Explain why: (Voluntary)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 38	PLUS	Multiple, see guidance	N/A	PUBLIC	Stewardship: Escalation	2

Describe your approach to escalation for your SSA and/or private debt fixed income assets.

(B) Private debt - Approach to escalation

Not investing
 Reducing exposure to the investee entity
 Litigation
 Other: could include direct negotiations with senior management or the board.

STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

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

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

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

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

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

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

Describe:

During 2023, we actively participated in several key initiatives, such as the Board of the Chilean Association of Investment Fund Administrators (ACAFI), the presidency of the ACAFI Sustainability Committee, the advisory council of the Chilean chapter of the Global Steering Group for Impact Investment (GSG Chile), the advisory council of NGO Comunidad Mujer, and the Civil Society Council of the Chilean Corporation for the Promotion of Production (Corfo).

- ☐ (D) We engaged policy makers on our own initiative

- ☒ (E) Other methods

Describe:

Currently, we maintain 13 impact investment partnerships and networks in operation. Additionally, our collaborators contributed to more than 35 seminars and forums, both national and international, thereby strengthening our commitment to positive change.

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

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

☒ (A) We publicly disclosed all our policy positions

Add link(s):

<https://amerisdocs-prod.s3.amazonaws.com/Sostenibilidad/Reportes/2023/Memoria%20Integrada%20Anual%20Ameris%20Capital%20AGF%20S.A.%202023.pdf>

☐ (B) We publicly disclosed details of our engagements with policy makers

- ☐ (C) No, we did not publicly disclose details of our engagement with policy makers conducted as part of our responsible investment approach during the reporting year

CLIMATE CHANGE

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

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

☒ (A) Yes, within our standard planning horizon

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

Will depend on the industry of the company we are invested (or evaluating for investment) as we take SASB standards as reference, and one of the indicators are GHG emissions and climate change impacts.

To identify physical risks we use the ARCLIM tool (Climate Risk Atlas for Chile) from the Chilean Ministry of the Environment (<https://arclim.mma.gob.cl/>), based on the geographic location of the assets to which we are most exposed and that are most sensitive to physical effects. Given the current location of the assets, the impacts would primarily come from: reduced precipitation, heatwaves, and an increase in very hot days; changes in wave patterns (swells) and, to a lesser extent, drought and flooding.

☒ (B) Yes, beyond our standard planning horizon

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

We identify transition risks. Investments associated with fossil fuels may become stranded assets if the energy transition occurs rapidly. Assets we invest in could be affected by requirements for carbon footprint measurement and greenhouse gas emissions reduction (climate change law, national commitments, and decarbonization plan); water efficiency measures (country situation); and energy efficiency measures (energy efficiency law).

- ☐ (C) No, we have not identified climate-related risks and/or opportunities affecting our investments

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

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

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

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

Our main sustainable investment strategy is integration, seeking to incorporate ESG matters both in the initial investment analysis and in their subsequent monitoring. The matters to be evaluated in the ESG integration use the SASB materiality map and respective standards as a reference, however we also incorporate cross-over matters to the analysis of all our investments, one of which is climate change.

To identify risks at a more macro level, we incorporate into Ameris' Risk Matrix the evaluation of ESG risks that could impact the performance of the strategy and the achievement of sustainability objectives, the so-called ESG Risk Matrix. The analysis for this matrix was conducted following guidelines from the COSO-WBCSD Enterprise Risk Management Framework and considered the following approaches to identify risks:

1. Compliance with our commitments and obligations in terms of sustainability.
2. Materiality analysis based on SASB recommendations for the main sectors to which we are exposed (our own financial and those of our main investments).
3. Analysis of megatrends with a local focus, including emerging trends in regulation.
4. Interviews and expert judgment.

The matrix establishes different fields for each identified risk: root cause, possible impacts, controls, risk indicators and review, responsible parties, among others. It is worth mentioning that with the active participation of the Director of Sustainable Investments on the Board, environmental and social issues are fully considered during deliberations and strategic decision-making, as well as in business planning and budgeting, among other crucial aspects for the management and direction of the company.

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

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 42	PLUS	N/A	N/A	PUBLIC	Climate change	General

Which sectors are covered by your organisation's strategy addressing high-emitting sectors?

- ☐ (A) Coal
- ☐ (B) Gas
- ☐ (C) Oil
- ☐ (D) Utilities
- ☐ (E) Cement

- ☐ (F) Steel
- ☐ (G) Aviation
- ☐ (H) Heavy duty road
- ☐ (I) Light duty road
- ☐ (J) Shipping
- ☐ (K) Aluminium
- ☐ (L) Agriculture, forestry, fishery
- ☐ (M) Chemicals
- ☐ (N) Construction and buildings
- ☐ (O) Textile and leather
- ☐ (P) Water
- ☐ (Q) Other

☒ (R) We do not have a strategy addressing high-emitting sectors

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

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

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

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

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

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

☒ (A) Yes, we have a process to identify and assess climate-related risks

(1) Describe your process

Our organization has developed a comprehensive process to identify, assess, and manage climate-related risks that could potentially affect our investments. This process integrates several key elements:

- Risk Identification: We utilize advanced tools such as the ARCLIM (Climate Risk Atlas) provided by the Ministry of the Environment, which helps us identify climate-related risks based on the geographic location of the assets we are most exposed to and which are most sensitive to physical effects.

- **Risk Matrix Integration:** We incorporate climate-related risks into our broader ESG Risk Matrix, which outlines various fields for each risk identified, including root cause, possible impacts, and controls. This matrix is a crucial part of our risk management framework, guiding us in systematically addressing potential vulnerabilities.
- **Macro-Level Risk Analysis:** To capture risks at a macro level, we follow the COSO-WBCSD Enterprise Risk Management Framework. This approach allows us to consider compliance with sustainability obligations, materiality analysis based on SASB recommendations for the sectors we are exposed to, and an analysis of megatrends with a local focus, including emerging regulatory trends.
- **Active Board Involvement:** The Director of Sustainable Investments plays an active role in the Board of Directors, ensuring that environmental and climate-related issues are fully considered during strategic decision-making, business planning, and budgeting processes. This ensures that climate considerations are embedded in all crucial aspects of our investment strategy and corporate governance.
- **Continuous Monitoring and Updating:** Our process includes continuous monitoring of climate-related risks and the effectiveness of implemented controls. We regularly review and update our risk matrix and strategies based on new information and emerging trends to ensure our approach remains robust and responsive.

Through these strategies, we aim to minimize potential adverse impacts from climate-related risks on our investments and enhance our capacity to capitalize on opportunities arising from the transition to a more sustainable economy. This structured approach not only helps us manage risks but also aligns with our commitment to sustainability and responsible investment.

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

Our process for identifying, assessing, and managing climate-related risks is seamlessly integrated into our overall risk management framework, ensuring that these considerations are central to our strategic planning and operational decisions. Here's how this integration is structured:

- **Holistic Risk Assessment:** We begin by incorporating climate-related risks into our comprehensive ESG Risk Matrix. This matrix is part of our wider risk management strategy, which includes various types of risks—financial, operational, and environmental. By integrating climate risks into this matrix, we ensure a unified approach to assessing all potential risks across our investment portfolio.
- **Tools and Frameworks:** Utilizing tools like the ARCLIM (Climate Risk Atlas) and adhering to frameworks such as the COSO-WBCSD Enterprise Risk Management Framework enable us to align our climate risk assessments with global best practices and standards. These tools help us pinpoint risks based on asset location and sensitivity to climate impacts, ensuring a data-driven approach to risk management.
- **Board Involvement and Governance:** The integration of our Director of Sustainable Investments into the Board of Directors ensures that climate-related issues are considered at the highest level of decision-making. This top-down approach guarantees that climate considerations influence not only investment decisions but also strategic corporate decisions, aligning with broader business objectives and sustainability goals.
- **Active Monitoring and Continuous Improvement:** We actively monitor the effectiveness of our risk controls and strategies through regular reviews of our Risk Matrix. This dynamic approach allows us to adapt to emerging risks and evolving regulatory environments.

By integrating climate risk management into our overall risk management framework, we ensure that these environmental factors are consistently considered across all levels of operation, enhancing our ability to manage potential impacts effectively while supporting our commitment to sustainability and responsible investment.

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

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

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

☒ (A) Exposure to physical risk

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
- (2) Metric or variable used and disclosed

☒ (3) Metric or variable used and disclosed, including methodology

(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

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☒ (B) Exposure to transition risk

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
- (2) Metric or variable used and disclosed

☒ (3) Metric or variable used and disclosed, including methodology

(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

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☐ (C) Internal carbon price

☐ (D) Total carbon emissions

☐ (E) Weighted average carbon intensity

☐ (F) Avoided emissions

☐ (G) Implied Temperature Rise (ITR)

☐ (H) Non-ITR measure of portfolio alignment with UNFCCC Paris Agreement goals

☐ (I) Proportion of assets or other business activities aligned with climate-related opportunities

☒ (J) Other metrics or variables

Specify:

AUM with exposure to fossil fuels (own funds) and waste management

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
- (2) Metric or variable used and disclosed

☒ (3) Metric or variable used and disclosed, including methodology

(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

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○ (K) Our organisation did not use or publicly disclose any climate risk metrics or variables affecting our investments during the reporting year

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

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

- ☐ (A) Scope 1 emissions
- ☐ (B) Scope 2 emissions
- ☐ (C) Scope 3 emissions (including financed emissions)
- ☒ (D) Our organisation did not publicly disclose its Scope 1, Scope 2, or Scope 3 greenhouse gas emissions during the reporting year

SUSTAINABILITY OUTCOMES

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

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

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

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.1	CORE	PGS 47	N/A	PUBLIC	Sustainability outcomes	1, 2

Which widely recognised frameworks has your organisation used to identify the intended and unintended sustainability outcomes connected to its investment activities?

- ☒ (A) The UN Sustainable Development Goals (SDGs) and targets
 - ☐ (B) The UNFCCC Paris Agreement
 - ☐ (C) The UN Guiding Principles on Business and Human Rights (UNGPs)
 - ☐ (D) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
 - ☐ (E) The EU Taxonomy
 - ☐ (F) Other relevant taxonomies
 - ☐ (G) The International Bill of Human Rights
 - ☐ (H) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
 - ☐ (I) The Convention on Biological Diversity
 - ☐ (J) Other international framework(s)
 - ☐ (K) Other regional framework(s)
 - ☒ (L) Other sectoral/issue-specific framework(s)
- Specify:

Not frameworks specifically but we also use BCorp, Iris+ and Theory of change approach

- (M) Our organisation did not use any widely recognised frameworks to identify the intended and unintended sustainability outcomes connected to its investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
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PGS 47.2	CORE	PGS 47	PGS 48	PUBLIC	Sustainability outcomes	1, 2
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What are the primary methods that your organisation has used to determine the most important intended and unintended sustainability outcomes connected to its investment activities?

- ☒ (A) Identify sustainability outcomes that are closely linked to our core investment activities
- ☐ (B) Consult with key clients and/or beneficiaries to align with their priorities
- ☐ (C) Assess which actual or potential negative outcomes for people are most severe based on their scale, scope, and irremediable character
- ☒ (D) Identify sustainability outcomes that are closely linked to systematic sustainability issues
- ☒ (E) Analyse the input from different stakeholders (e.g. affected communities, civil society, trade unions or similar)
- ☒ (F) Understand the geographical relevance of specific sustainability outcome objectives
- ☐ (G) Other method
- (H) We have not yet determined the most important sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
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PGS 48	CORE	PGS 47.2	PGS 48.1, SO 1	PUBLIC	Sustainability outcomes	1, 2
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Has your organisation taken action on any specific sustainability outcomes connected to its investment activities, including to prevent and mitigate actual and potential negative outcomes?

- ☒ (A) Yes, we have taken action on some of the specific sustainability outcomes connected to our investment activities
- (B) No, we have not yet taken action on any specific sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
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PGS 48.1	PLUS	PGS 48	N/A	PUBLIC	Sustainability outcomes	1, 2
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Why has your organisation taken action on specific sustainability outcomes connected to its investment activities?

- ☐ (A) We believe that taking action on sustainability outcomes is relevant to our financial risks and returns over both short- and long-term horizons
- ☒ (B) We believe that taking action on sustainability outcomes, although not yet relevant to our financial risks and returns, will become so over a long-time horizon
- ☒ (C) We have been requested to do so by our clients and/or beneficiaries
- ☒ (D) We want to prepare for and respond to legal and regulatory developments that are increasingly addressing sustainability outcomes
- ☒ (E) We want to protect our reputation, particularly in the event of negative sustainability outcomes connected to investments
- ☐ (F) We want to enhance our social licence-to-operate (i.e. the trust of beneficiaries, clients, and other stakeholders)
- ☐ (G) We believe that taking action on sustainability outcomes in parallel to financial return goals has merit in its own right
- ☐ (H) Other

LISTED EQUITY (LE)

OVERALL APPROACH

MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 1	CORE	OO 21	N/A	PUBLIC	Materiality analysis	1

Does your organisation have a formal investment process to identify and incorporate material ESG factors across your listed equity strategies?

	(1) Passive equity	(3) Active - fundamental
(A) Yes, our investment process incorporates material governance factors	(3) for a minority of our AUM	(2) for a majority of our AUM
(B) Yes, our investment process incorporates material environmental and social factors	(3) for a minority of our AUM	(2) for a majority of our AUM
(C) Yes, our investment process incorporates material ESG factors beyond our organisation's average investment holding period	(3) for a minority of our AUM	(2) for a majority of our AUM
(D) No, we do not have a formal process. Our investment professionals identify material ESG factors at their discretion	○	○
(E) No, we do not have a formal or informal process to identify and incorporate material ESG factors	○	○

MONITORING ESG TRENDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 2	CORE	OO 21	N/A	PUBLIC	Monitoring ESG trends	1

Does your organisation have a formal process for monitoring and reviewing the implications of changing ESG trends across your listed equity strategies?

	(1) Passive equity	(3) Active - fundamental
(A) Yes, we have a formal process that includes scenario analyses		
(B) Yes, we have a formal process, but it does not include scenario analyses		
(C) We do not have a formal process for our listed equity strategies; our investment professionals monitor how ESG trends vary over time at their discretion	☒	☒
(D) We do not monitor and review the implications of changing ESG trends on our listed equity strategies	☐	☐

PRE-INVESTMENT

ESG INCORPORATION IN RESEARCH

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 3	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

How does your financial analysis and equity valuation or security rating process incorporate material ESG risks?

(2) Active - fundamental

(A) We incorporate material governance-related risks into our financial analysis and equity valuation or security rating process

(2) in a majority of cases

(B) We incorporate material environmental and social risks into our financial analysis and equity valuation or security rating process

(2) in a majority of cases

(C) We incorporate material environmental and social risks related to companies' supply chains into our financial analysis and equity valuation or security rating process

(3) in a minority of cases

(D) We do not incorporate material ESG risks into our financial analysis, equity valuation or security rating processes

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Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 4	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

What information do you incorporate when you assess the ESG performance of companies in your financial analysis, benchmark selection and/or portfolio construction process?

	(1) Passive equity	(3) Active - fundamental
(A) We incorporate qualitative and/or quantitative information on current performance across a range of material ESG factors		(2) in a majority of cases
(B) We incorporate qualitative and/or quantitative information on historical performance across a range of material ESG factors		(3) in a minority of cases
(C) We incorporate qualitative and/or quantitative information on material ESG factors that may impact or influence future corporate revenues and/or profitability		(2) in a majority of cases
(D) We incorporate qualitative and/or quantitative information enabling current, historical and/or future performance comparison within a selected peer group across a range of material ESG factors	(3) in a minority of cases	(2) in a majority of cases
(E) We do not incorporate qualitative or quantitative information on material ESG factors when assessing the ESG performance of companies in our financial analysis, equity investment or portfolio construction process	○	○

ESG INCORPORATION IN PORTFOLIO CONSTRUCTION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 5	PLUS	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

Provide an example of how you incorporated ESG factors into your equity selection and research process during the reporting year.

In the selection and research of investments, we monitor 3 ESG ratings: MSCI, Sustainalytics/Morning Star and S&P. They allow us to have a general image of the investment in the three agencies.

Periodically, we review the ESG performance of our funds according to these ratings.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 6	CORE	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

How do material ESG factors contribute to your stock selection, portfolio construction and/or benchmark selection process?

	(1) Passive equity	(3) Active - fundamental
(A) Material ESG factors contribute to the selection of individual assets and/or sector weightings within our portfolio construction and/or benchmark selection process		
(B) Material ESG factors contribute to the portfolio weighting of individual assets within our portfolio construction and/or benchmark selection process		
(C) Material ESG factors contribute to the country or region weighting of assets within our portfolio construction and/or benchmark selection process		
(D) Other ways material ESG factors contribute to your portfolio construction and/or benchmark selection process	(2) for a majority of our AUM	(2) for a majority of our AUM

(E) Our stock selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors

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(D) Other ways material ESG factors contribute to your portfolio construction and/or benchmark selection process - Specify:

Faced with two possible investments with similar financial performance, priority is given to the one with better ESG factors

PASSIVE INVESTMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 7	PLUS	OO 21	N/A	PUBLIC	Passive investments	1

Provide an example of how material ESG factors influenced weightings and tilts in the design of your passively managed funds.

Rather than determining weightings and tilts in the design of our passively managed funds, ESG factors provide us with a framework for company selection at source.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 8	PLUS	OO 19, OO 21	N/A	PUBLIC	Passive investments	1

How does your organisation select the ESG index(es) or benchmark(s) for your passive listed equity assets?

- ☐ (A) We commission customised indexes
- ☒ **(B) We compare the methodology amongst the index providers available**

Explain:

We monitor 3 ESG ratings: MSCI, Sustainalytics/Morning Star and S&P.

- ☐ (C) We compare the costs of different options available in the market
- ☐ (D) Other

POST-INVESTMENT

ESG RISK MANAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 10	CORE	OO 21	N/A	PUBLIC	ESG risk management	1

For the majority of your listed equity assets, do you have a formal process to identify and incorporate material ESG risks and ESG incidents into your risk management process?

(2) Active - fundamental

(A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual listed equity holdings

☐

(B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for other listed equity holdings exposed to similar risks and/or incidents

☐

(C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for our stewardship activities

☐

(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents

☐

(E) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process; our investment professionals identify and incorporate material ESG risks and ESG incidents at their discretion

○

(F) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process

●

FIXED INCOME (FI)

OVERALL APPROACH

MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 1	CORE	OO 21	N/A	PUBLIC	Materiality analysis	1

Does your organisation have a formal investment process to identify and incorporate material ESG factors across your fixed income assets?

	(2) Corporate	(4) Private debt
(A) Yes, our investment process incorporates material governance factors	(1) for all of our AUM	(1) for all of our AUM
(B) Yes, our investment process incorporates material environmental and social factors	(3) for a minority of our AUM	(2) for a majority of our AUM
(C) Yes, our investment process incorporates material ESG factors depending on different investment time horizons		
(D) No, we do not have a formal process; our investment professionals identify material ESG factors at their discretion	○	○
(E) No, we do not have a formal or informal process to identify and incorporate material ESG factors	○	○

MONITORING ESG TRENDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 2	CORE	OO 21	N/A	PUBLIC	Monitoring ESG trends	1

Does your organisation have a formal process for monitoring and reviewing the implications of changing ESG trends across your fixed income assets?

(2) Corporate

(A) Yes, we have a formal process that includes scenario analyses

(B) Yes, we have a formal process, but does it not include scenario analyses

(C) We do not have a formal process for our fixed income assets; our investment professionals monitor how ESG trends vary over time at their discretion

☐

(D) We do not monitor and review the implications of changing ESG trends on our fixed income assets

☒

PRE-INVESTMENT

ESG INCORPORATION IN RESEARCH

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 3	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

For the majority of your fixed income investments, does your organisation incorporate material ESG factors when assessing their credit quality?

	(2) Corporate	(4) Private debt
(A) We incorporate material environmental and social factors	☐	☒
(B) We incorporate material governance-related factors	☒	☒
(C) We do not incorporate material ESG factors for the majority of our fixed income investments	☐	☐

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 4	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

Does your organisation have a framework that differentiates ESG risks by issuer country, region and/or sector?

	(2) Corporate	(4) Private debt
(A) Yes, we have a framework that differentiates ESG risks by country and/or region (e.g. local governance and labour practices)		(2) for a majority of our AUM
(B) Yes, we have a framework that differentiates ESG risks by sector		(2) for a majority of our AUM
(C) No, we do not have a framework that differentiates ESG risks by issuer country, region and/or sector	☒	☐

(D) Not applicable; we are not able to differentiate ESG risks by issuer country, region and/or sector due to the limited universe of our issuers

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Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 5	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

How does your organisation incorporate material ESG factors when selecting private debt investments during the due diligence phase?

☒ **(A) We use a qualitative ESG checklist**

Select from dropdown list:

☒ **(1) in all cases**

- ☐ (2) in a majority of cases
- ☐ (3) in a minority of cases

☒ **(B) We assess quantitative information on material ESG factors, such as energy consumption, carbon footprint and gender diversity**

Select from dropdown list:

☒ **(1) in all cases**

- ☐ (2) in a majority of cases
- ☐ (3) in a minority of cases

☒ **(C) We check whether the target company has its own responsible investment policy, sustainability policy or ESG policy**

Select from dropdown list:

☒ **(1) in all cases**

- ☐ (2) in a majority of cases
- ☐ (3) in a minority of cases

☐ **(D) We hire third-party consultants to do technical due diligence on specific material ESG factors where internal capabilities are not available**

☒ **(E) We require the review and sign-off of our ESG due diligence process by our investment committee, or the equivalent function**

Select from dropdown list:

☒ **(1) in all cases**

- ☐ (2) in a majority of cases
- ☐ (3) in a minority of cases

☐ **(F) We use industry-recognised responsible investment due diligence questionnaire (DDQ) templates**

☐ **(G) We use another method of incorporating material ESG factors when selecting private debt investments during the due diligence process**

☐ **(H) We do not incorporate material ESG factors when selecting private debt investments during the due diligence phase**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 6	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

How do you incorporate significant changes in material ESG factors over time into your fixed income asset valuation process?

(2) Corporate

(3) Private debt

(A) We incorporate it into the forecast of financial metrics or other quantitative assessments

(B) We make a qualitative assessment of how material ESG factors may evolve

(2) for a majority of our AUM

(C) We do not incorporate significant changes in material ESG factors



ESG INCORPORATION IN PORTFOLIO CONSTRUCTION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 8	CORE	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

How do material ESG factors contribute to your security selection, portfolio construction and/or benchmark selection process?

(2) Corporate

(A) Material ESG factors contribute to the selection of individual assets and/or sector weightings within our portfolio construction and/or benchmark selection process

(B) Material ESG factors contribute to determining the holding period of individual assets within our portfolio construction and/or benchmark selection process

(C) Material ESG factors contribute to the portfolio weighting of individual assets within our portfolio construction and/or benchmark selection process

(D) Material ESG factors contribute to the country or region weighting of assets within our portfolio construction and/or benchmark selection process

(E) Material ESG factors contribute to our portfolio construction and/or benchmark selection process in other ways

(F) Our security selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors



POST-INVESTMENT

ESG RISK MANAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 11	CORE	OO 21	N/A	PUBLIC	ESG risk management	1

How are material ESG factors incorporated into your portfolio risk management process?

	(2) Corporate	(4) Private debt
(A) Investment committee members, or the equivalent function or group, can veto investment decisions based on ESG considerations	(1) for all of our AUM	(1) for all of our AUM
(B) Companies, sectors, countries and/or currencies are monitored for changes in exposure to material ESG factors and any breaches of risk limits		(2) for a majority of our AUM
(C) Overall exposure to specific material ESG factors is measured for our portfolio construction, and sizing or hedging adjustments are made depending on the individual issuer or issue sensitivity to these factors		(3) for a minority of our AUM
(D) We use another method of incorporating material ESG factors into our portfolio's risk management process		
(E) We do not have a process to incorporate material ESG factors into our portfolio's risk management process	○	○

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 12	CORE	OO 21	N/A	PUBLIC	ESG risk management	1

For the majority of your fixed income assets, do you have a formal process to identify and incorporate material ESG risks and ESG incidents into your risk management process?

	(2) Corporate	(4) Private debt
(A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual fixed income holdings	☐	☒
(B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents, and their implications for other fixed income holdings exposed to similar risks and/or incidents	☐	☒
(C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents, and their implications for our stewardship activities	☐	☐
(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents	☐	☒
(E) We do not have a formal process to identify and incorporate ESG risks and ESG incidents; our investment professionals identify and incorporate ESG risks and ESG incidents at their discretion	☒	☐
(F) We do not have a formal process to identify and incorporate ESG risks and ESG incidents into our risk management process	☐	☐

PERFORMANCE MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 13	CORE	OO 21	N/A	PUBLIC	Performance monitoring	1

During the reporting year, how did your organisation incorporate material ESG factors when monitoring private debt investments?

☒ **(A) We used a qualitative ESG checklist**

Select from dropdown list:

- ☒ **(1) in all cases**
- ☐ (2) in the majority of cases
- ☐ (3) in the minority of cases

☒ **(B) We assessed quantitative information on material ESG factors, such as energy consumption, carbon footprint and gender diversity**

Select from dropdown list:

- ☒ **(1) in all cases**
- ☐ (2) in the majority of cases
- ☐ (3) in the minority of cases

☐ (C) We hired third-party consultants to do technical assessment on specific material ESG factors where internal capabilities were not available

☒ **(D) We used industry body guidelines**

Select from dropdown list:

- ☒ **(1) in all cases**
- ☐ (2) in the majority of cases
- ☐ (3) in the minority of cases

☐ (E) We used another method to incorporate material ESG factors into the monitoring of private debt investments

☐ (F) We did not incorporate material ESG factors when monitoring private debt investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 14	PLUS	OO 5.3 FI, OO 21	N/A	PUBLIC	Performance monitoring	1

Provide an example of how the incorporation of environmental and/or social factors in your fixed income valuation or portfolio construction affected the realised returns of those assets.

Ameris completed a Private Debt investments towards a Non-Banking Financial Institutions providing leasing and loans to financing automobiles in Mexico. A large volume of customers of this company financed acquisitions of Internal Combustions Engine (ICE) vehicles and as such a large share of the underlying assets of such portfolio were ICE vehicles that, on a bird of a feather, issue more pollution particles than Hybrid and EV-vehicles.

In light of such underlying portfolio composition, the investee company held weak environmental credentials and although the company had in place robust social and governmental practices, its overall ESG credentials were damped as a result. The investment team hence factored such ESG consideration onto a higher interest rate charged to the investee company, this is, the team increased the cost of capital of such company because of its weak ESG overall position. Consequently, the return and profitability of the portfolio was driven by such ESG consideration.

REAL ESTATE (RE)

POLICY

INVESTMENT GUIDELINES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 1	CORE	OO 21, OO 24, OO 26	N/A	PUBLIC	Investment guidelines	1 to 6

What real estate-specific ESG guidelines are currently covered in your organisation's responsible investment policy(ies)?

- ☒ (A) Guidelines on our ESG approach to real estate depending on use (e.g. retail and education) and geography
- ☒ (B) Guidelines on our ESG approach to new construction
- ☒ (D) Guidelines on our ESG approach to standing real estate investments
- ☐ (E) Guidelines on pre-investment screening
- ☐ (F) Guidelines on our approach to ESG integration into short-term or 100-day plans (or equivalent)
- ☒ (G) Guidelines on our approach to ESG integration into long-term value creation efforts
- ☒ (H) Guidelines on our approach to ESG reporting
- ☒ (I) Guidelines on our engagement approach related to third-party property managers
- ☐ (J) Guidelines on our engagement approach related to tenants
- ☐ (K) Guidelines on our engagement approach related to construction contractors
- ☐ (L) Our responsible investment policy(ies) does not cover real estate-specific ESG guidelines

FUNDRAISING

COMMITMENTS TO INVESTORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 2	CORE	OO 21	N/A	PUBLIC	Commitments to investors	1, 4

For all of the funds that you closed during the reporting year, what type of formal responsible investment commitments did you make in Limited Partnership Agreements (LPAs), side letters, or other constitutive fund documents?

- ☐ (A) We incorporated responsible investment commitments in LPAs (or equivalent) as a standard default procedure
- ☐ (B) We added responsible investment commitments in LPAs (or equivalent) upon a client's request
- ☐ (C) We added responsible investment commitments in side letters upon a client's request
- ☒ (D) We did not make any formal responsible investment commitments for the relevant reporting year
- ☐ (E) Not applicable; we have not raised funds in the last five years

PRE-INVESTMENT

MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 3	CORE	OO 21	RE 3.1	PUBLIC	Materiality analysis	1

During the reporting year, how did you conduct ESG materiality analysis for your potential real estate investments?

- ☐ (A) We assessed ESG materiality for each property, as each case is unique
- ☒ (B) We performed a mix of property level and property type or category level ESG materiality analysis
 - Select from dropdown list:
 - ☐ (1) for all of our potential real estate investments
 - ☒ (2) for a majority of our potential real estate investments
 - ☐ (3) for a minority of our potential real estate investments
- ☐ (C) We assessed ESG materiality at the property type or category level only
- ☐ (D) We did not conduct ESG materiality analysis for our potential real estate investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 3.1	CORE	RE 3	N/A	PUBLIC	Materiality analysis	1

During the reporting year, what tools, standards and data did you use in your ESG materiality analysis of potential real estate investments?

- ☐ (A) We used GRI standards to inform our real estate ESG materiality analysis
- ☒ (B) We used SASB standards to inform our real estate ESG materiality analysis
- ☒ (C) We used the UN Sustainable Development Goals (SDGs) to inform our real estate ESG materiality analysis
- ☐ (D) We used GRESB Materiality Assessment (RC7) or similar to inform our real estate ESG materiality analysis
- ☒ (E) We used climate disclosures, such as the TCFD recommendations or other climate risk and/or exposure analysis tools, to inform our real estate ESG materiality analysis
- ☐ (F) We used the UN Guiding Principles on Business and Human Rights (UNGPs) to inform our real estate ESG materiality analysis
- ☐ (G) We used geopolitical and macro-economic considerations in our real estate ESG materiality analysis
- ☒ (H) We used green building certifications to inform our real estate ESG materiality analysis
- ☒ (I) We engaged with the existing owners and/or managers (or developers for new properties) to inform our real estate ESG materiality analysis
- ☐ (J) Other

DUE DILIGENCE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 4	CORE	OO 21	N/A	PUBLIC	Due diligence	1

During the reporting year, how did material ESG factors influence your selection of real estate investments?

☒ (A) Material ESG factors were used to identify risks

Select from dropdown list:

- ☐ (1) for all of our potential real estate investments
- ☒ (2) for a majority of our potential real estate investments
- ☐ (3) for a minority of our potential real estate investments

☐ (B) Material ESG factors were discussed by the investment committee (or equivalent)

☐ (C) Material ESG factors were used to identify remedial actions for our 100-day plans (or equivalent)

☒ (D) Material ESG factors were used to identify opportunities for value creation

Select from dropdown list:

- ☐ (1) for all of our potential real estate investments
- ☒ (2) for a majority of our potential real estate investments
- ☐ (3) for a minority of our potential real estate investments

☐ (E) Material ESG factors informed our decision to abandon potential investments in the due diligence phase in cases where ESG risks were considered too high to mitigate

☐ (F) Material ESG factors impacted investments in terms of the price offered and/or paid

☐ (G) Material ESG factors did not influence the selection of our real estate investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 5	CORE	OO 21	N/A	PUBLIC	Due diligence	1

Once material ESG factors have been identified, what processes do you use to conduct due diligence on these factors for potential real estate investments?

☒ (A) We conduct a high-level or desktop review against an ESG checklist for initial red flags

Select from dropdown list:

- ☐ (1) for all of our potential real estate investments
- ☒ (2) for a majority of our potential real estate investments
- ☐ (3) for a minority of our potential real estate investments

☒ (B) We send detailed ESG questionnaires to target properties

Select from dropdown list:

- ☐ (1) for all of our potential real estate investments
- ☒ (2) for a majority of our potential real estate investments
- ☐ (3) for a minority of our potential real estate investments

☐ (C) We hire third-party consultants to do technical due diligence on specific material ESG factors

☒ (D) We conduct site visits

Select from dropdown list:

- ☒ (1) for all of our potential real estate investments
- ☐ (2) for a majority of our potential real estate investments
- ☐ (3) for a minority of our potential real estate investments

☒ (E) We conduct in-depth interviews with management and/or personnel

Select from dropdown list:

- ☐ (1) for all of our potential real estate investments
- ☒ (2) for a majority of our potential real estate investments

- (3) for a minority of our potential real estate investments
- ☒ (F) We conduct detailed external stakeholder analysis and/or engagement
 - Select from dropdown list:
 - (1) for all of our potential real estate investments
 - (2) for a majority of our potential real estate investments
 - (3) for a minority of our potential real estate investments
- ☐ (G) We incorporate ESG due diligence findings in all of our relevant investment process documentation in the same manner as for other key due diligence, e.g. commercial, accounting and legal
- ☐ (H) Our investment committee (or an equivalent decision-making body) is ultimately responsible for ensuring all ESG due diligence is completed in the same manner as for other key due diligence, e.g. commercial, accounting and legal
- ☐ (I) Other
- (J) We do not conduct due diligence on material ESG factors for potential real estate investments

SELECTION, APPOINTMENT AND MONITORING OF THIRD-PARTY PROPERTY MANAGERS

SELECTION PROCESS OF THIRD-PARTY PROPERTY MANAGERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 6	CORE	OO 26	N/A	PUBLIC	Selection process of third-party property managers	1, 4

During the reporting year, how did you include material ESG factors in all of your selections of third-party property managers?

- ☒ (A) We requested information from potential third-party property managers on their overall approach to material ESG factors
- ☐ (B) We requested track records and examples from potential third-party property managers on their management of material ESG factors
- ☐ (C) We requested information from potential third-party property managers on their engagement process(es) with stakeholders
- ☒ (D) We requested documentation from potential third-party property managers on their responsible procurement practices, including responsibilities, approach and incentives
- ☐ (E) We requested the assessment of current and planned availability and aggregation of metering data from potential third-party property managers
- ☐ (F) Other
- (G) We did not include material ESG factors in our selection of third-party property managers

APPOINTMENT PROCESS OF THIRD-PARTY PROPERTY MANAGERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 7	CORE	OO 26	N/A	PUBLIC	Appointment process of third-party property managers	1, 4

How did you include material ESG factors when appointing your current third-party property managers?

- ☐ (A) We set dedicated ESG procedures in all relevant property management phases
- ☒ (B) We set clear ESG reporting requirements
 - Select from dropdown list:
 - (1) for all of our third-party property managers

- ☒ (2) for a majority of our third-party property managers
 - ☐ (3) for a minority of our third-party property managers
- ☐ (C) We set clear targets on material ESG factors
- ☐ (D) We set incentives related to targets on material ESG factors
- ☐ (E) We included responsible investment clauses in property management contracts
- ☐ (F) Other
 - ☐ (G) We did not include material ESG factors in the appointment of third-party property managers

MONITORING PROCESS OF THIRD-PARTY PROPERTY MANAGERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 8	CORE	OO 26	N/A	PUBLIC	Monitoring process of third-party property managers	1, 4

How do you include material ESG factors when monitoring current third-party property managers?

- ☒ (A) We monitor the performance of quantitative and/or qualitative targets on material environmental factors
 - Select from dropdown list:
 - ☐ (1) for all of our third-party property managers
 - ☒ (2) for a majority of our third-party property managers
 - ☐ (3) for a minority of our third-party property managers
- ☒ (B) We monitor the performance of quantitative and/or qualitative targets on material social factors
 - Select from dropdown list:
 - ☐ (1) for all of our third-party property managers
 - ☒ (2) for a majority of our third-party property managers
 - ☐ (3) for a minority of our third-party property managers
- ☒ (C) We monitor the performance of quantitative and/or qualitative targets on material governance factors
 - Select from dropdown list:
 - ☐ (1) for all of our third-party property managers
 - ☒ (2) for a majority of our third-party property managers
 - ☐ (3) for a minority of our third-party property managers
- ☐ (D) We monitor progress reports on engagement with tenants
- ☒ (E) We require formal reporting at least yearly
 - Select from dropdown list:
 - ☐ (1) for all of our third-party property managers
 - ☒ (2) for a majority of our third-party property managers
 - ☐ (3) for a minority of our third-party property managers
- ☐ (F) We have discussions about material ESG factors with all relevant stakeholders at least yearly
- ☐ (G) We conduct a performance review of third-party property managers against targets on material ESG factors and/or a financial incentive structure linked to material ESG factors
- ☒ (H) We have internal or external parties conduct site visits at least yearly
 - Select from dropdown list:
 - ☐ (1) for all of our third-party property managers
 - ☒ (2) for a majority of our third-party property managers
 - ☐ (3) for a minority of our third-party property managers
- ☐ (I) Other
 - ☐ (J) We do not include material ESG factors in the monitoring of third-party property managers

CONSTRUCTION AND DEVELOPMENT

CONSTRUCTION REQUIREMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 9	CORE	OO 24	N/A	PUBLIC	Construction requirements	1

What ESG requirements do you currently have in place for all development projects and major renovations?

- ☒ (A) We require the management of waste by diverting materials (e.g. from construction and demolition, reusable vegetation, rocks and soil) from disposal
- ☒ (B) We require the minimisation of light and noise pollution that would affect the surrounding community
- ☒ (C) We require the performance of an environmental and social site impact assessment
- ☒ (D) We require the protection of the air quality during construction
- ☐ (E) We require the protection and restoration of the habitat and soils disturbed during construction and/or during previous development
- ☐ (F) We require the protection of surface water, groundwater and aquatic ecosystems by controlling and retaining construction pollutants
- ☒ (G) We require constant monitoring of health and safety at the construction site
- ☐ (H) We require engagement with local communities and other stakeholders during the design and/or planning process
- ☒ (I) Other
Specify:

Legal Chilean requirements in social and environmental factors (waste, noise pollution, air quality, health and safety construction site)

- (J) We do not have ESG requirements in place for development projects and major renovations

MINIMUM BUILDING REQUIREMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 10	CORE	OO 24	N/A	PUBLIC	Minimum building requirements	1

What minimum building requirements do you have in place for development projects and major renovations?

- ☐ (A) We require the implementation of the latest available metering and internet of things (IoT) technology
- ☐ (B) We require the building to be able to obtain a recognised green and/or healthy building certification for new buildings
- ☐ (C) We require the use of certified (or labelled) sustainable building materials
- ☐ (D) We require the installation of renewable energy technologies where feasible
- ☐ (E) We require that development projects and major renovations become net-zero carbon emitters within five years of completion of the construction
- ☐ (F) We require water conservation measures
- ☐ (G) We require common health and well-being measures for occupants
- ☐ (H) Other
- ☒ (I) We do not have minimum building requirements in place for development projects and major renovations

POST-INVESTMENT

MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 11	CORE	OO 21	RE 11.1	PUBLIC	Monitoring	1

During the reporting year, did you track one or more KPIs on material ESG factors across your real estate investments?

☒ (A) Yes, we tracked KPIs on environmental factors

Percentage of real estate assets this applies to:

- ☐ (1) >0 to 10%
- ☐ (2) >10 to 50%
- ☒ (3) >50 to 75%
- ☐ (4) >75 to 95%
- ☐ (5) >95%

☒ (B) Yes, we tracked KPIs on social factors

Percentage of real estate assets this applies to:

- ☐ (1) >0 to 10%
- ☐ (2) >10 to 50%
- ☒ (3) >50 to 75%
- ☐ (4) >75 to 95%
- ☐ (5) >95%

☒ (C) Yes, we tracked KPIs on governance factors

Percentage of real estate assets this applies to:

- ☐ (1) >0 to 10%
- ☐ (2) >10 to 50%
- ☒ (3) >50 to 75%
- ☐ (4) >75 to 95%
- ☐ (5) >95%

☐ (D) We did not track KPIs on material ESG factors across our real estate investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 11.1	PLUS	RE 11	N/A	PUBLIC	Monitoring	1

Provide examples of KPIs on material ESG factors you tracked across your real estate investments during the reporting year.

(A) ESG KPI #1

kWh/m2 Power consumption intensity

(B) ESG KPI #2

% Use of renewable energy

(C) ESG KPI #3

Energy classification/certification

(D) ESG KPI #4

located in a water stress area

(E) ESG KPI #5

m3/m2 water consumption intensity

(F) ESG KPI #6

% Water acquired by drinking water network

(G) ESG KPI #7

tons of waste generated (total)

(H) ESG KPI #8

% recycled waste

(I) ESG KPI #9

ton CO2eq Carbon footprint

(J) ESG KPI #10

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 12	CORE	OO 21	N/A	PUBLIC	Monitoring	1

During the reporting year, what ESG building performance data did you collect for your real estate assets?

☒ **(A) Energy consumption**

Select from dropdown list:

- ☐ (1) for all of our real estate assets
- ☒ **(2) for a majority of our real estate assets**
- ☐ (3) for a minority of our real estate assets

☒ **(B) Water consumption**

Select from dropdown list:

- ☐ (1) for all of our real estate assets
- ☒ **(2) for a majority of our real estate assets**
- ☐ (3) for a minority of our real estate assets

☒ **(C) Waste production**

Select from dropdown list:

- ☐ (1) for all of our real estate assets
- ☐ (2) for a majority of our real estate assets
- ☒ **(3) for a minority of our real estate assets**

☒ **(D) Other**

Specify:

Carbon footprint

Select from dropdown list:

- ☐ (1) for all of our real estate assets
- ☐ (2) for a majority of our real estate assets
- ☒ **(3) for a minority of our real estate assets**
- ☐ (E) We did not collect ESG building performance data for our real estate assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 13	CORE	OO 21, OO 26	RE 13.1	PUBLIC	Monitoring	1, 2

What processes do you have in place to support meeting your targets on material ESG factors for your real estate investments?

- ☐ (A) We use operational-level benchmarks to assess and analyse the performance of assets against sector performance
- ☐ (B) We implement certified environmental and social management systems across our portfolio
- ☐ (C) We make sufficient budget available to ensure that the systems and procedures needed are established
- ☐ (D) We hire external verification services to audit performance, systems, and procedures
- ☒ **(E) We collaborate and engage with our third-party property managers and/or tenants to develop action plans**
 Select from dropdown list:
 - ☐ (1) for all of our real estate assets
 - ☒ **(2) for a majority of our real estate assets**
 - ☐ (3) for a minority of our real estate assets
- ☐ (F) We develop minimum health and safety standards
- ☐ (G) We conduct ongoing engagement with all key stakeholders, e.g. local communities, NGOs, governments, and end-users
- ☒ **(H) Other**
 Specify:

Annual meetings

 Select from dropdown list:
 - ☐ (1) for all of our real estate assets
 - ☒ **(2) for a majority of our real estate assets**
 - ☐ (3) for a minority of our real estate assets
- ☐ (I) We do not have processes in place to help meet our targets on material ESG factors for our real estate investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 13.1	PLUS	RE 13	N/A	PUBLIC	Monitoring	1, 2

Describe up to two processes you put in place during the reporting year to support meeting your targets on material ESG factors.

(A) Process one

We have an initial meeting with the investments to introduce them to the importance of ESG issues at Ameris. And from now on, in the periodic monitoring meetings, emphasis is placed on the importance of complying with ESG aspects.

(B) Process two

Formal feedback is given to the investment from the internal ESG evaluation, with the aim of identifying the main areas for improvement and reducing those that may present a risk

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

Post-investment, how do you manage material ESG risks and ESG opportunities to create value during the holding period?

- ☐ (A) We develop property-specific ESG action plans based on pre-investment research, due diligence and materiality findings
- ☒ **(B) We adjust our ESG action plans based on performance monitoring findings at least yearly**
 Select from dropdown list:
- ☐ (1) for all of our real estate investments
 - ☒ **(2) for a majority of our real estate investments**
 - ☐ (3) for a minority of our real estate investments
- ☐ (C) We, or the external advisors that we hire, support our real estate investments with specific ESG value-creation opportunities
- ☐ (D) Other
- ☐ (E) We do not manage material ESG risks and opportunities post-investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 15	PLUS	OO 21	N/A	PUBLIC	Monitoring	1, 2

Describe how you ensure that material ESG risks are adequately addressed in the real estate investments where you hold a minority stake.

We address it through follow-up meetings, highlighting the importance of ESG issues at Ameris. Also, formal feedback is given to all investments, majority and minority, regarding the internal ESG evaluation, with the aim of identifying the main areas for improvement and reducing those that may present a risk.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 16	PLUS	OO 21	N/A	PUBLIC	Monitoring	1, 2

Describe how your ESG action plans are currently defined, implemented and monitored throughout the investment period.

The plan is defined based on the internal ESG evaluation, which identifies areas for improvement and those that may present a risk. It is implemented through follow-up meetings. It is monitored with the quarterly, semi-annual or annual requirement of KPIs.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 17	CORE	OO 21	N/A	PUBLIC	Monitoring	1

What proportion of your real estate assets has obtained a green or sustainable building certification?

- ☐ (A) All of our real estate assets have obtained a green or sustainable building certification
- ☐ (B) A majority of our real estate assets have obtained a green or sustainable building certification
- ☒ **(C) A minority of our real estate assets have obtained a green or sustainable building certification**
- ☐ (D) None of our real estate assets have obtained a green or sustainable building certification

STAKEHOLDER ENGAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 18	CORE	OO 21	N/A	PUBLIC	Stakeholder engagement	1, 2

How does your third-party property manager(s) engage with tenants?

- ☐ (A) They engage with real estate tenants on energy, water consumption and/or waste production
- ☐ (B) They engage with real estate tenants by organising tenant events focused on increasing sustainability awareness, ESG training and guidance
- ☐ (C) They engage with real estate tenants by offering green leases
- ☐ (D) They engage with real estate tenants by identifying collaboration opportunities that support targets related to material ESG factors
- ☐ (E) They engage with real estate tenants by offering shared financial benefits from equipment upgrades
- ☐ (F) Other
- ☒ (G) Our third-party property manager(s) do not engage with tenants

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 19	PLUS	OO 21	N/A	PUBLIC	Stakeholder engagement	1, 2

During the reporting year, how did you or the organisations operating on your behalf engage with the local community above and beyond what is required by relevant regulations for asset design, use and/or repurposing?

In residential operations, various activities are carried out to generate community in the buildings. Activities for children, camaraderie among residents, holiday celebrations, etc.

EXIT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 20	CORE	OO 21	N/A	PUBLIC	Exit	4, 6

During the reporting year, what responsible investment information was shared with potential buyers of real estate investments?

- ☐ (A) Our firm's high-level commitment to responsible investment, e.g. that we are a PRI signatory
- ☐ (B) A description of what industry and asset class standards our firm aligns with, e.g. TCFD or GRESB
- ☐ (C) Our firm's responsible investment policy (at minimum, a summary of key aspects and firm-specific approach)
- ☐ (D) Our firm's ESG risk assessment methodology (topics covered in-house and/or with external support)
- ☐ (E) The outcome of our latest ESG risk assessment of the property(s)
- ☐ (F) Key ESG performance data on the property(s) being sold
- ☐ (G) Other
- ☐ (H) No responsible investment information was shared with potential buyers of real estate investments during the reporting year
- ☒ (I) Not applicable; we had no sales process (or control over the sales process) during the reporting year

DISCLOSURE OF ESG PORTFOLIO INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 21	CORE	OO 21	N/A	PUBLIC	Disclosure of ESG portfolio information	6

During the reporting year, how did you report on your targets on material ESG factors and related data to your investors?

- ☒ (A) We reported through a publicly disclosed sustainability report
- ☐ (B) We reported in aggregate through formal reporting to investors
- ☒ (C) We reported at the property level through formal reporting to investors
- ☒ (D) We reported through a limited partners advisory committee (or equivalent)
- ☒ (E) We reported at digital or physical events or meetings with investors
- ☐ (F) We had a process in place to ensure that serious ESG incidents were reported
- ☐ (G) Other
- ☐ (H) We did not report our targets on material ESG factors and related data to our investors during the reporting year

INFRASTRUCTURE (INF)

POLICY

INVESTMENT GUIDELINES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 1	CORE	OO 21, OO 29, OO 30	N/A	PUBLIC	Investment guidelines	1 to 6

What infrastructure-specific ESG guidelines are currently covered in your organisation's responsible investment policy(ies)?

- ☒ (A) Guidelines on our ESG approach tailored to each infrastructure sector and geography where we invest
- ☐ (C) Guidelines on our ESG approach to brownfield investments
- ☐ (D) Guidelines on pre-investment screening
- ☐ (E) Guidelines on our approach to ESG integration into short-term or 100-day plans (or equivalent)
- ☐ (F) Guidelines on our approach to ESG integration into long-term value-creation efforts
- ☐ (G) Guidelines on our approach to ESG reporting
- ☐ (H) Guidelines on our engagement approach related to the workforce
- ☐ (J) Guidelines on our engagement approach related to contractors
- ☐ (K) Guidelines on our engagement approach related to other external stakeholders, e.g. governments, local communities, and end-users
- ☐ (L) Our responsible investment policy(ies) does not cover infrastructure-specific ESG guidelines

FUNDRAISING

COMMITMENTS TO INVESTORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 2	CORE	OO 21	N/A	PUBLIC	Commitments to investors	1, 4

For all of the funds that you closed during the reporting year, what type of formal responsible investment commitments did you make in Limited Partnership Agreements (LPAs), side letters, or other constitutive fund documents?

- ☐ (A) We incorporated responsible investment commitments in LPAs (or equivalent) as a standard default procedure
- ☐ (B) We added responsible investment commitments in LPAs (or equivalent) upon a client's request
- ☐ (C) We added responsible investment commitments in side letters upon a client's request
- ☒ (D) We did not make any formal responsible investment commitments for the relevant reporting year
- ☐ (E) Not applicable; we have not raised funds in the last five years

PRE-INVESTMENT

MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 3	CORE	OO 21	INF 3.1	PUBLIC	Materiality analysis	1

During the reporting year, how did you conduct ESG materiality analysis for your potential infrastructure investments?

- ☐ (A) We assessed ESG materiality at the asset level, as each case is unique
- ☒ (B) We performed a mix of industry-level and asset-level ESG materiality analyses
 - Select from dropdown list
 - ☐ (1) for all of our potential infrastructure investments
 - ☒ (2) for a majority of our potential infrastructure investments
 - ☐ (3) for a minority of our potential infrastructure investments
- ☐ (C) We assessed ESG materiality at the industry level only
- ☐ (D) We did not conduct ESG materiality analysis for our potential infrastructure investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 3.1	CORE	INF 3	N/A	PUBLIC	Materiality analysis	1

During the reporting year, what tools, standards and data did you use in your ESG materiality analysis of potential infrastructure investments?

- ☐ (A) We used GRI standards to inform our infrastructure ESG materiality analysis
- ☒ (B) We used SASB standards to inform our infrastructure ESG materiality analysis
- ☐ (C) We used the UN Sustainable Development Goals (SDGs) to inform our infrastructure ESG materiality analysis
- ☐ (D) We used the GRESB Materiality Assessment (RC7) or similar to inform our infrastructure ESG materiality analysis
- ☐ (E) We used the environmental and social factors detailed in the IFC Performance Standards (or similar standards used by development finance institutions) in our infrastructure ESG materiality analysis
- ☐ (F) We used climate disclosures, such as the TCFD recommendations or other climate risk and/or exposure analysis tools, to inform our infrastructure ESG materiality analysis
- ☐ (G) We used the UN Guiding Principles on Business and Human Rights (UNGPs) to inform our infrastructure ESG materiality analysis
- ☐ (H) We used geopolitical and macro-economic considerations in our infrastructure ESG materiality analysis
- ☐ (I) We engaged with existing owners and/or managers (or developers for new infrastructure assets) to inform our infrastructure ESG materiality analysis
- ☐ (J) Other

DUE DILIGENCE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 4	CORE	OO 21	N/A	PUBLIC	Due diligence	1

During the reporting year, how did material ESG factors influence the selection of your infrastructure investments?

☒ (A) Material ESG factors were used to identify risks

Select from dropdown list

- ☒ (1) for all of our potential infrastructure investments
- ☐ (2) for a majority of our potential infrastructure investments
- ☐ (3) for a minority of our potential infrastructure investments

☒ (B) Material ESG factors were discussed by the investment committee (or equivalent)

Select from dropdown list

- ☒ (1) for all of our potential infrastructure investments
- ☐ (2) for a majority of our potential infrastructure investments
- ☐ (3) for a minority of our potential infrastructure investments

☐ (C) Material ESG factors were used to identify remedial actions for our 100-day plans (or equivalent)

☐ (D) Material ESG factors were used to identify opportunities for value creation

☒ (E) Material ESG factors informed our decision to abandon potential investments in the due diligence phase in cases where ESG risks were considered too high to mitigate

Select from dropdown list

- ☒ (1) for all of our potential infrastructure investments
- ☐ (2) for a majority of our potential infrastructure investments
- ☐ (3) for a minority of our potential infrastructure investments

☐ (F) Material ESG factors impacted investments in terms of the price offered and/or paid

☐ (G) Material ESG factors did not influence the selection of our infrastructure investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 5	CORE	OO 21	N/A	PUBLIC	Due diligence	1

Once material ESG factors have been identified, what processes do you use to conduct due diligence on these factors for potential infrastructure investments?

☒ (A) We conduct a high-level or desktop review against an ESG checklist for initial red flags

Select from dropdown list

- ☒ (1) for all of our potential infrastructure investments
- ☐ (2) for a majority of our potential infrastructure investments
- ☐ (3) for a minority of our potential infrastructure investments

☒ (B) We send detailed ESG questionnaires to target assets

Select from dropdown list

- ☒ (1) for all of our potential infrastructure investments
- ☐ (2) for a majority of our potential infrastructure investments
- ☐ (3) for a minority of our potential infrastructure investments

☐ (C) We hire third-party consultants to do technical due diligence on specific material ESG factors

☒ (D) We conduct site visits

Select from dropdown list

- ☒ (1) for all of our potential infrastructure investments
- ☐ (2) for a majority of our potential infrastructure investments
- ☐ (3) for a minority of our potential infrastructure investments

- ☐ (E) We conduct in-depth interviews with management and/or personnel
- ☐ (F) We conduct detailed external stakeholder analyses and/or engagement
- ☒ **(G) We incorporate ESG due diligence findings in all of our relevant investment process documentation in the same manner as other key due diligence, e.g. commercial, accounting and legal**
 - Select from dropdown list
 - ☒ **(1) for all of our potential infrastructure investments**
 - ☐ (2) for a majority of our potential infrastructure investments
 - ☐ (3) for a minority of our potential infrastructure investments
- ☒ **(H) Our investment committee (or an equivalent decision-making body) is ultimately responsible for ensuring all ESG due diligence is completed in the same manner as for other key due diligence, e.g. commercial, accounting and legal**
 - Select from dropdown list
 - ☒ **(1) for all of our potential infrastructure investments**
 - ☐ (2) for a majority of our potential infrastructure investments
 - ☐ (3) for a minority of our potential infrastructure investments
- ☐ (I) Other
 - ☐ (J) We do not conduct due diligence on material ESG factors for potential infrastructure investments

POST-INVESTMENT

MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 9	CORE	OO 21	INF 9.1	PUBLIC	Monitoring	1

During the reporting year, did you track one or more KPIs on material ESG factors across your infrastructure investments?

- ☒ **(A) Yes, we tracked KPIs on environmental factors**
 - Percentage of infrastructure assets this applies to:
 - ☐ (1) >0 to 10%
 - ☐ (2) >10 to 50%
 - ☐ (3) >50 to 75%
 - ☐ (4) >75 to 95%
 - ☒ **(5) >95%**
- ☒ **(B) Yes, we tracked KPIs on social factors**
 - Percentage of infrastructure assets this applies to:
 - ☐ (1) >0 to 10%
 - ☐ (2) >10 to 50%
 - ☐ (3) >50 to 75%
 - ☐ (4) >75 to 95%
 - ☒ **(5) >95%**
- ☒ **(C) Yes, we tracked KPIs on governance factors**
 - Percentage of infrastructure assets this applies to:
 - ☐ (1) >0 to 10%
 - ☐ (2) >10 to 50%
 - ☐ (3) >50 to 75%
 - ☐ (4) >75 to 95%
 - ☒ **(5) >95%**
- ☐ (D) We did not track KPIs on material ESG factors across our infrastructure investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 9.1	PLUS	INF 9	N/A	PUBLIC	Monitoring	1

Provide examples of KPIs on material ESG factors you tracked across your infrastructure investments during the reporting year.

(A) ESG KPI #1

Greenhouse Gas Emissions (GHG)

(B) ESG KPI #2

Emissions of atmospheric pollutants (NOx, SOx, MP10, COV)

(C) ESG KPI #3

water management (m3 drinking water, % recycled water)

(D) ESG KPI #4

location in a water stress area

(E) ESG KPI #5

Tons of hazardous waste generated and % recycled

(F) ESG KPI #6

Accident rate and fatality rate

(G) ESG KPI #7

(H) ESG KPI #8

(I) ESG KPI #9

(J) ESG KPI #10

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 10	CORE	OO 21, OO 30	INF 10.1	PUBLIC	Monitoring	1, 2

What processes do you have in place to support meeting your targets on material ESG factors for your infrastructure investments?

☐ (A) We use operational-level benchmarks to assess and analyse the performance of assets against sector performance

☒ (B) We implement international best practice standards such as the IFC Performance Standards to guide ongoing assessments and analyses

Select from dropdown list

☐ (1) for all of our infrastructure investments

☒ (2) for a majority of our infrastructure investments

☐ (3) for a minority of our infrastructure investments

☐ (C) We implement certified environmental and social management systems across our portfolio

☐ (D) We make sufficient budget available to ensure that the systems and procedures needed are established

☐ (E) We hire external verification services to audit performance, systems, and procedures

☐ (G) We develop minimum health and safety standards

☐ (H) We conduct ongoing engagement with all key stakeholders, e.g. local communities, NGOs, governments, and end-users

☒ (I) Other

Specify:

We track KPIs, which are based on SASB

Select from dropdown list

- ☒ (1) for all of our infrastructure investments
- ☐ (2) for a majority of our infrastructure investments
- ☐ (3) for a minority of our infrastructure investments
- ☐ (J) We do not have processes in place to help meet our targets on material ESG factors for our infrastructure investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 11	CORE	OO 21	N/A	PUBLIC	Monitoring	1, 2

Post-investment, how do you manage material ESG risks and ESG opportunities to create value during the holding period of your investments?

☒ (A) We develop asset-specific ESG action plans based on pre-investment research, due diligence and materiality findings

Select from dropdown list

- ☐ (1) for all of our infrastructure investments
- ☒ (2) for a majority of our infrastructure investments
- ☐ (3) for a minority of our infrastructure investments
- ☐ (B) We adjust our ESG action plans based on performance monitoring findings at least yearly
- ☐ (C) We, or the external advisors that we hire, support our infrastructure investments with specific ESG value-creation opportunities
- ☐ (D) Other
- ☐ (E) We do not manage material ESG risks and opportunities post-investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 12	PLUS	OO 21	N/A	PUBLIC	Monitoring	1, 2

Describe how you ensure that material ESG risks are adequately addressed in the infrastructure investments where you hold a minority stake.

We address it through follow-up meetings, highlighting the importance of ESG issues at Ameris. Also, formal feedback is given to all investments, majority and minority, regarding the internal ESG evaluation, with the aim of identifying the main areas for improvement and reducing those that may present a risk.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 13	PLUS	OO 21	N/A	PUBLIC	Monitoring	2

Describe how your ESG action plans are defined, implemented and monitored throughout the investment period.

The plan is defined based on the internal ESG evaluation, which identifies areas for improvement and those that may present a risk. It is implemented through follow-up meetings. It is monitored with the quarterly, semi-annual or annual requirement of KPIs.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 14	CORE	OO 21	INF 14.1	PUBLIC	Monitoring	1, 2

How do you ensure that adequate ESG-related competence exists at the asset level?

- ☐ (A) We assign our board responsibility for ESG matters
- ☒ **(B) We ensure that material ESG matters are discussed by our board at least yearly**
- Select from dropdown list
- ☐ (1) for all of our infrastructure investments
 - ☒ **(2) for a majority of our infrastructure investments**
 - ☐ (3) for a minority of our infrastructure investments
- ☐ (C) We provide training on ESG aspects and management best practices relevant to the asset to C-suite executives only
- ☐ (D) We provide training on ESG aspects and management best practices relevant to the asset to employees (excl. C-suite executives)
- ☐ (E) We support the asset by finding external ESG expertise, e.g. consultants or auditors
- ☐ (F) We share best practices across assets, e.g. educational sessions and the implementation of environmental and social management systems
- ☐ (G) We apply penalties or incentives to improve ESG performance in management remuneration schemes
- ☒ **(H) Other**
- Specify:

We are minority investors, so we discuss at the board level whether ESG policies and commitments are being met

Select from dropdown list

- ☒ **(1) for all of our infrastructure investments**
- ☐ (2) for a majority of our infrastructure investments
- ☐ (3) for a minority of our infrastructure investments
- ☐ (I) We do not ensure that adequate ESG-related competence exists at the asset level

EXIT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 16	CORE	OO 21	N/A	PUBLIC	Exit	4, 6

During the reporting year, what responsible investment information was shared with potential buyers of infrastructure investments?

- ☐ (A) Our firm's high-level commitment to responsible investment, e.g. that we are a PRI signatory
- ☐ (B) A description of what industry and asset class standards our firm aligns with, e.g. TCFD or GRESB
- ☐ (C) Our firm's responsible investment policy (at minimum, a summary of key aspects and firm-specific approach)
- ☐ (D) Our firm's ESG risk assessment methodology (topics covered in-house and/or with external support)
- ☐ (E) The outcome of our latest ESG risk assessment on the asset or portfolio company
- ☐ (F) Key ESG performance data on the asset or portfolio company being sold
- ☐ (G) Other
- ☐ (H) No responsible investment information was shared with potential buyers of infrastructure investments during the reporting year
- ☒ **(I) Not applicable; we had no sales process (or control over the sales process) during the reporting year**

DISCLOSURE OF ESG PORTFOLIO INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 17	CORE	OO 21	N/A	PUBLIC	Disclosure of ESG portfolio information	6

During the reporting year, how did you report your targets on material ESG factors and related data to your investors?

- ☒ (A) We reported through a publicly-disclosed sustainability report
- ☐ (B) We reported in aggregate through formal reporting to investors
- ☐ (C) We reported at the asset level through formal reporting to investors
- ☐ (D) We reported through a limited partners advisory committee (or equivalent)
- ☐ (E) We reported at digital or physical events or meetings with investors
- ☐ (F) We had a process in place to ensure that reporting on serious ESG incidents occurred
- ☐ (G) Other
- ☐ (H) We did not report our targets on material ESG factors and related data to our investors during the reporting year

PRIVATE EQUITY (PE)

POLICY

INVESTMENT GUIDELINES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 1	CORE	OO 21	N/A	PUBLIC	Investment guidelines	1 to 6

What private equity-specific ESG guidelines are currently covered in your organisation's responsible investment policy(ies)?

- ☒ (A) Guidelines on our ESG approach tailored to the sector(s) and geography(ies) where we invest
- ☐ (B) Guidelines on our ESG approach tailored to the strategy(ies) and company stage(s) where we invest, e.g. venture capital, buy-out and distressed
- ☐ (C) Guidelines on pre-investment screening
- ☒ (D) Guidelines on minimum ESG due diligence requirements
- ☐ (E) Guidelines on our approach to ESG integration into short-term or 100-day plans (or equivalent)
- ☒ (F) Guidelines on our approach to ESG integration into long-term value-creation efforts
- ☐ (G) Guidelines on our approach to monitoring ESG risks, ESG opportunities and ESG incidents
- ☒ (H) Guidelines on our approach to ESG reporting
- ☐ (I) Our responsible investment policy(ies) does not cover private equity-specific ESG guidelines

FUNDRAISING

COMMITMENTS TO INVESTORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 2	CORE	OO 21	N/A	PUBLIC	Commitments to investors	1, 4

For all of the funds that you closed during the reporting year, what type of formal responsible investment commitments did you make in Limited Partnership Agreements (LPAs), side letters or other constitutive fund documents?

- ☒ (A) We incorporated responsible investment commitments in LPAs (or equivalent) as a standard default procedure
- ☐ (B) We added responsible investment commitments in LPAs (or equivalent) upon clients' request
- ☐ (C) We added responsible investment commitments in side letters upon clients' request
- ☐ (D) We did not make any formal responsible investment commitments for the relevant reporting year
- ☐ (E) Not applicable; we have not raised funds in the last five years

PRE-INVESTMENT

MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 3	CORE	OO 21	PE 3.1	PUBLIC	Materiality analysis	1

During the reporting year, how did you conduct ESG materiality analysis for your potential private equity investments?

☒ (A) We assessed ESG materiality at the portfolio company level, as each case is unique

Select from dropdown list

- ☐ (1) for all of our potential private equity investments
- ☐ (2) for the majority of our potential private equity investments
- ☒ (3) for a minority of our potential private equity investments
- ☐ (B) We performed a mix of industry-level and portfolio company-level ESG materiality analyses
- ☐ (C) We assessed ESG materiality at the industry level only
- ☐ (D) We did not conduct ESG materiality analyses for our potential private equity investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 3.1	CORE	PE 3	N/A	PUBLIC	Materiality analysis	1

During the reporting year, what tools, standards and data did you use in your ESG materiality analysis of potential private equity investments?

- ☐ (A) We used GRI standards to inform our private equity ESG materiality analysis
- ☒ (B) We used SASB standards to inform our private equity ESG materiality analysis
- ☒ (C) We used the UN Sustainable Development Goals (SDGs) to inform our private equity ESG materiality analysis
- ☐ (D) We used environmental and social factors detailed in the IFC Performance Standards (or other similar standards used by development-focused financial institutions) in our private equity ESG materiality analysis
- ☒ (E) We used climate disclosures, such as the TCFD recommendations or other climate risk and/or exposure analysis tools, to inform our private equity ESG materiality analysis
- ☐ (F) We used the UN Guiding Principles on Business and Human Rights (UNGPs) to inform our private equity ESG materiality analysis
- ☐ (G) We used geopolitical and macro-economic considerations in our private equity ESG materiality analysis
- ☒ (H) We engaged with the prospective portfolio company to inform our private equity ESG materiality analysis
- ☒ (I) Other

Specify:

IRIS+

DUE DILIGENCE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 4	CORE	OO 21	N/A	PUBLIC	Due diligence	1

During the reporting year, how did material ESG factors influence the selection of your private equity investments?

☒ (A) Material ESG factors were used to identify risks

Select from dropdown list

- ☐ (1) for all of our potential private equity investments
- ☒ (2) for the majority of our potential private equity investments
- ☐ (3) for a minority of our potential private equity investments

☒ (B) Material ESG factors were discussed by the investment committee (or equivalent)

Select from dropdown list

- ☐ (1) for all of our potential private equity investments
- ☒ (2) for the majority of our potential private equity investments
- ☐ (3) for a minority of our potential private equity investments

☐ (C) Material ESG factors were used to identify remedial actions for our 100-day plans (or equivalent)

☒ (D) Material ESG factors were used to identify opportunities for value creation

Select from dropdown list

- ☐ (1) for all of our potential private equity investments
- ☐ (2) for the majority of our potential private equity investments
- ☒ (3) for a minority of our potential private equity investments

☐ (E) Material ESG factors informed our decision to abandon potential investments in the due diligence phase in cases where ESG risks were considered too high to mitigate

☒ (F) Material ESG factors impacted investments in terms of the price offered and/or paid

Select from dropdown list

- ☐ (1) for all of our potential private equity investments
- ☐ (2) for the majority of our potential private equity investments
- ☒ (3) for a minority of our potential private equity investments

☐ (G) Material ESG factors did not influence the selection of our private equity investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 5	CORE	OO 21	N/A	PUBLIC	Due diligence	1

Once material ESG factors have been identified, what processes do you use to conduct due diligence on these factors for potential private equity investments?

☒ (A) We do a high-level or desktop review using an ESG checklist for initial red flags

Select from dropdown list

- ☐ (1) for all of our potential private equity investments
- ☒ (2) for a majority of our potential private equity investments
- ☐ (3) for a minority of our potential private equity investments

☒ (B) We send detailed ESG questionnaires to target companies

Select from dropdown list

- ☐ (1) for all of our potential private equity investments
- ☒ (2) for a majority of our potential private equity investments
- ☐ (3) for a minority of our potential private equity investments

☒ (C) We hire third-party consultants to do technical due diligence on specific material ESG factors

Select from dropdown list

- (1) for all of our potential private equity investments
- (2) for a majority of our potential private equity investments
- (3) for a minority of our potential private equity investments
- ☒ (D) We conduct site visits
 - Select from dropdown list
 - (1) for all of our potential private equity investments
 - (2) for a majority of our potential private equity investments
 - (3) for a minority of our potential private equity investments
- ☒ (E) We conduct in-depth interviews with management and/or personnel
 - Select from dropdown list
 - (1) for all of our potential private equity investments
 - (2) for a majority of our potential private equity investments
 - (3) for a minority of our potential private equity investments
- ☐ (F) We conduct detailed external stakeholder analyses and/or engagement
- ☒ (G) We incorporate ESG due diligence findings in all of our relevant investment process documentation in the same manner as other key due diligence, e.g. commercial, accounting and legal
 - Select from dropdown list
 - (1) for all of our potential private equity investments
 - (2) for a majority of our potential private equity investments
 - (3) for a minority of our potential private equity investments
- ☒ (H) Our investment committee (or an equivalent decision-making body) is ultimately responsible for ensuring all ESG due diligence is completed in the same manner as for other key due diligence, e.g. commercial, accounting, and legal
 - Select from dropdown list
 - (1) for all of our potential private equity investments
 - (2) for a majority of our potential private equity investments
 - (3) for a minority of our potential private equity investments
- ☒ (I) Other
 - Specify:
 - for our impact funds, impact on social and environmental issues are as relevant as financial issues
 - Select from dropdown list
 - (1) for all of our potential private equity investments
 - (2) for a majority of our potential private equity investments
 - (3) for a minority of our potential private equity investments
- (J) We do not conduct due diligence on material ESG factors for potential private equity investments

POST-INVESTMENT

MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 6	CORE	OO 21	PE 6.1	PUBLIC	Monitoring	1

During the reporting year, did you track one or more KPIs on material ESG factors across your private equity investments?

- ☒ (A) Yes, we tracked KPIs on environmental factors
 - Percentage of portfolio companies this applies to:
 - (1) >0 to 10%
 - (2) >10 to 50%
 - (3) >50 to 75%
 - (4) >75 to 95%
 - (5) >95%
- ☒ (B) Yes, we tracked KPIs on social factors
 - Percentage of portfolio companies this applies to:
 - (1) >0 to 10%

- (2) >10 to 50%
- (3) >50 to 75%
- (4) >75 to 95%
- (5) >95%

☒ (C) Yes, we tracked KPIs on governance factors

Percentage of portfolio companies this applies to:

- (1) >0 to 10%
- (2) >10 to 50%
- (3) >50 to 75%
- (4) >75 to 95%
- (5) >95%

- (D) We did not track KPIs on material ESG factors across our private equity investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 6.1	PLUS	PE 6	N/A	PUBLIC	Monitoring	1

Provide examples of KPIs on material ESG factors you tracked across your private equity investments during the reporting year.

(A) ESG KPI #1

Total number of emissions (tons of CO2 equivalent).

(B) ESG KPI #2

Total atmospheric emissions of the following pollutants (tons): a) NOx, b) SOx, c) particulate matter (PM10), d) H2S and f) volatile organic compounds (VOC).

(C) ESG KPI #3

Total fresh water withdrawn (m3), percentage of it recycled/reused (%) and percentage in regions with water scarcity (%).

(D) ESG KPI #4

Amount of hazardous waste generated (ton), percentage of it recycled/reused (%).

(E) ESG KPI #5

Total accident rate, fatality rate for employees (including contractor companies).

(F) ESG KPI #6

Female managers (%)

(G) ESG KPI #7

Impact on SDGs

(H) ESG KPI #8

(I) ESG KPI #9

(J) ESG KPI #10

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 7	CORE	OO 21	PE 7.1	PUBLIC	Monitoring	1, 2

What processes do you have in place to support meeting your targets on material ESG factors for your private equity investments?

- ☒ (A) We use operational-level benchmarks to assess and analyse the performance of portfolio companies against sector performance

Select from dropdown list

- ☐ (1) for all of our private equity investments
- ☒ (2) for a majority of our private equity investments
- ☐ (3) for a minority of our private equity investments

☒ (B) We implement international best practice standards, such as the IFC Performance Standards, to guide ongoing assessments and analyses

Select from dropdown list

- ☐ (1) for all of our private equity investments
- ☒ (2) for a majority of our private equity investments
- ☐ (3) for a minority of our private equity investments

☐ (C) We implement certified environmental and social management systems across our portfolio

☐ (D) We make sufficient budget available to ensure that the systems and procedures needed are established

☒ (E) We hire external verification services to audit performance, systems, and procedures

Select from dropdown list

- ☐ (1) for all of our private equity investments
- ☐ (2) for a majority of our private equity investments
- ☒ (3) for a minority of our private equity investments

☐ (F) We conduct ongoing engagement with all key stakeholders at the portfolio company level, e.g. local communities, NGOs, governments, and end-users

☐ (G) We implement 100-day plans, ESG roadmaps and similar processes

☒ (H) Other

Specify:

Companies in our impact funds also present once a year to the investment committee in order to track the meeting of ESG targets

Select from dropdown list

- ☐ (1) for all of our private equity investments
- ☐ (2) for a majority of our private equity investments
- ☒ (3) for a minority of our private equity investments

☐ (I) We do not have processes in place to help meet our targets on material ESG factors for our private equity investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 7.1	PLUS	PE 7	N/A	PUBLIC	Monitoring	1, 2

Describe up to two processes you have put in place during the reporting year to help meet your targets on material ESG factors.

(A) Process one

We have introduced the ESG world to unfamiliar investments through meetings and our internal ESG assessments. After this, two investments periodically report KPIs on ESG matters. We have supported and encouraged changes in the sustainability policy of an investment.

(B) Process two

Our impact funds develop a theory of change, based on it, indicators and goals to be met are identified, which are periodically reviewed. Additionally, an external impact assessment is carried out, which is later translated into a matrix of opportunities for improvement.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 8	PLUS	OO 21	N/A	PUBLIC	Monitoring	1, 2

Describe material ESG risks and ESG opportunities that you integrate into your 100-day plans, including those accountable for their successful completion and how the process is monitored.

In our impact investment funds investment process, the generation and management of impact is as relevant as financial performance, so each investment is evaluated using a risk-return-impact logic. The impact measurement and management methodology uses The GIIN's Impact Measurement & Management framework as a reference and considers internal measurements and evaluations of the socio-environmental results of each institution, an independent external socio-environmental evaluation and impact performance reports.

In the internal evaluation, we work with the institutions of the portfolio in the definition of process metrics, results and relevant benchmarks to establish goals, monitor performance and manage the success of the institutions towards success. In turn, it incorporates feedback throughout the entire life cycle of the Fund's investments.

The methodology incorporates the contribution to the SDGs according to the institution's impact objective, definition of socio-environmental indicators based on its Theory of Change, the goals of the SDGs and the catalog of IRIS+ metrics and others associated with the industry to which it belongs. the institution, gender approach and inclusion of ESG practices in its management, among others.

The progress of the results of the indicators with respect to the established goals is analyzed annually, the transversal approaches are monitored and improvement action plans are established for the short, medium and long term.

The external evaluation is an annual independent verification of the impact results of the Funds and portfolio institutions. It is carried out by a third party that applies its own model of evaluation of impact results, in a rigorous and transparent manner, and then delivers an opinion.

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

Post-investment, how do you manage material ESG risks and ESG opportunities to create value during the holding period of your investments?

☒ **(A) We develop company-specific ESG action plans based on pre-investment research, due diligence and materiality findings**

Select from dropdown list

- ☐ (1) for all of our private equity investments
- ☐ (2) for a majority of our private equity investments
- ☒ **(3) for a minority of our private equity investments**

☒ **(B) We adjust our ESG action plans based on performance monitoring findings at least yearly**

Select from dropdown list

- ☐ (1) for all of our private equity investments
- ☐ (2) for a majority of our private equity investments
- ☒ **(3) for a minority of our private equity investments**

☐ (C) We, or the external advisors that we hire, support our private equity investments with specific ESG value-creation opportunities

☒ **(D) We engage with the board to manage ESG risks and ESG opportunities post-investment**

Select from dropdown list

- ☐ (1) for all of our private equity investments
- ☒ **(2) for a majority of our private equity investments**
- ☐ (3) for a minority of our private equity investments

☐ (E) Other

- (F) We do not manage material ESG risks and opportunities post-investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 10	PLUS	OO 21	N/A	PUBLIC	Monitoring	1, 2

Describe how you ensure that material ESG risks are adequately addressed in the private equity investments in which you hold a minority stake.

We address it through follow-up meetings, highlighting the importance of ESG issues at Ameris. Also, formal feedback is given to all investments, majority and minority, regarding the internal ESG evaluation, with the aim of identifying the main areas for improvement and reducing those that may present a risk.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 11	PLUS	OO 21	N/A	PUBLIC	Monitoring	2

Describe how your ESG action plans are currently defined, implemented and monitored throughout the investment period.

The plan is defined based on the internal ESG evaluation, which identifies areas for improvement and those that may present a risk. It is implemented through follow-up meetings. It is monitored with the quarterly, semi-annual or annual requirement of KPIs.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 12	CORE	OO 21	PE 12.1	PUBLIC	Monitoring	1, 2

How do you ensure that adequate ESG-related competence exists at the portfolio company level?

- ☐ (A) We assign the board responsibility for ESG matters
- ☐ (B) We ensure that material ESG matters are discussed by the board at least yearly
- ☐ (C) We provide training on ESG aspects and management best practices relevant to the portfolio company to C-suite executives only
- ☐ (D) We provide training on ESG aspects and management best practices relevant to the portfolio company to employees (excl. C-suite executives)
- ☒ **(E) We support the portfolio company in developing and implementing its ESG strategy**
 - Select from dropdown list
 - (1) for all of our private equity investments
 - (2) for a majority of our private equity investments
 - **(3) for a minority of our private equity investments**
- ☐ (F) We support portfolio companies by finding external ESG expertise, e.g. consultants or auditors
- ☒ **(G) We share best practices across portfolio companies, e.g. educational sessions or the implementation of environmental and social management systems**
 - Select from dropdown list
 - (1) for all of our private equity investments
 - (2) for a majority of our private equity investments
 - **(3) for a minority of our private equity investments**
- ☐ (H) We include penalties or incentives to improve ESG performance in management remuneration schemes
- ☒ **(I) Other**
 - Specify:

We usually seek to get a seat in the board in the companies of our impact funds

Select from dropdown list

- (1) for all of our private equity investments
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments
- (J) We do not ensure that adequate ESG-related competence exists at the portfolio company level

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
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PE 12.1	PLUS	PE 12	N/A	PUBLIC	Monitoring	1, 2
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Describe up to two initiatives taken as part of your ESG competence-building efforts at the portfolio company level during the reporting year.

(A) Initiative 1

We periodically hold meetings with C-level management. We usually seek to get a seat in the board in the companies of our impact funds.

(B) Initiative 2

Formal feedback is given to all investments, majority and minority, regarding the internal ESG evaluation, with the aim of identifying the main areas for improvement and reducing those that may present a risk.

EXIT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
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PE 13	CORE	OO 21	N/A	PUBLIC	Exit	4, 6
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During the reporting year, what responsible investment information was shared with potential buyers of private equity investments?

- ☒ (A) Our firm's high-level commitment to responsible investment, e.g. that we are a PRI signatory
 - Select from dropdown list
 - (1) for all of our private equity investments
 - (2) for a majority of our private equity investments
 - (3) for a minority of our private equity investments
- ☐ (B) A description of what industry and asset class standards our firm aligns with, e.g. TCFD
- ☒ (C) Our firm's responsible investment policy (at minimum, a summary of key aspects and firm-specific approach)
 - Select from dropdown list
 - (1) for all of our private equity investments
 - (2) for a majority of our private equity investments
 - (3) for a minority of our private equity investments
- ☒ (D) Our firm's ESG risk assessment methodology (topics covered in-house and/or with external support)
 - Select from dropdown list
 - (1) for all of our private equity investments
 - (2) for a majority of our private equity investments
 - (3) for a minority of our private equity investments
- ☒ (E) The outcome of our latest ESG risk assessment on the asset or portfolio company
 - Select from dropdown list
 - (1) for all of our private equity investments
 - (2) for a majority of our private equity investments
 - (3) for a minority of our private equity investments
- ☐ (F) Key ESG performance data on the asset or portfolio company being sold
- ☐ (G) Other

- (H) No responsible investment information was shared with potential buyers of private equity investments during the reporting year
- (I) Not applicable; we had no sales process (or control over the sales process) during the reporting year

DISCLOSURE OF ESG PORTFOLIO INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 14	CORE	OO 21	N/A	PUBLIC	Disclosure of ESG portfolio information	6

During the reporting year, how did you report your targets on material ESG factors and related data to your investors?

- ☒ (A) We used a publicly disclosed sustainability report
- ☐ (B) We reported in aggregate through formal reporting to investors
- ☒ (C) We reported at the portfolio company level through formal reporting to investors
- ☒ (D) We reported through a limited partners advisory committee (or equivalent)
- ☒ (E) We reported back at digital or physical events or meetings with investors
- ☐ (F) We had a process in place to ensure that reporting on serious ESG incidents occurred
- ☒ (G) Other

Specify:

(A) applies to all our investments. (C) (D) and (E) to our impact investments

- (H) We did not report our targets on material ESG factors and related data to our investors during the reporting year

CONFIDENCE-BUILDING MEASURES (CBM)

CONFIDENCE-BUILDING MEASURES

APPROACH TO CONFIDENCE-BUILDING MEASURES

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

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

- ☐ (A) We conducted independent third-party assurance of selected processes and/or data related to the responsible investment processes reported in our PRI report, which resulted in a formal assurance conclusion
- ☐ (B) We conducted a third-party readiness review and are making changes to our internal controls or governance processes to be able to conduct independent third-party assurance next year
- ☒ (C) We conducted an internal audit of selected processes and/or data related to the responsible investment processes reported in our PRI report
- ☒ (D) Our board, trustees (or equivalent), senior executive-level staff (or equivalent), and/or investment committee (or equivalent) signed off on our PRI report
- ☐ (E) We conducted an external ESG audit of our holdings to verify that our funds comply with our responsible investment policy
- ☐ (F) We conducted an external ESG audit of our holdings as part of risk management, engagement identification or investment decision-making
- ☒ (G) Our responses in selected sections and/or the entirety of our PRI report were internally reviewed before submission to the PRI
- ☐ (H) We did not verify the information submitted in our PRI report this reporting year

INTERNAL AUDIT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 4	CORE	OO 21, CBM 1	N/A	PUBLIC	Internal audit	6

What responsible investment processes and/or data were audited through your internal audit function?

- ☒ (A) Policy, governance and strategy
 - Select from dropdown list:
 - ☐ (1) Data internally audited
 - ☒ (2) Processes internally audited
 - ☐ (3) Processes and data internally audited
- ☐ (C) Listed equity
- ☐ (D) Fixed income
- ☒ (E) Private equity
 - Select from dropdown list:
 - ☐ (1) Data internally audited
 - ☐ (2) Processes internally audited
 - ☒ (3) Processes and data internally audited
- ☐ (F) Real estate

☐ (G) Infrastructure

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 5	PLUS	CBM 1	N/A	PUBLIC	Internal audit	6

Provide details of the internal audit process regarding the information submitted in your PRI report.

The company's risk matrix and the ESG risk matrix are evaluated annually. Additionally, for our impact funds, internal and external ESG evaluations are carried out.

INTERNAL REVIEW

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

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

☐ (A) Board, trustees, or equivalent

☒ (B) Senior executive-level staff, investment committee, head of department, or equivalent

Sections of PRI report reviewed

○ (1) the entire report

● (2) selected sections of the report

○ (C) None of the above internal roles reviewed selected sections or the entirety of the responses submitted in our PRI report this year