



PUBLIC RI REPORT

2021 PILOT

Russell Investments

Generated 2022-08-18

About this report

The PRI Reporting Framework helps to build a common language and industry standard for reporting responsible investment activities. **Public RI Reports** provide accountability and transparency on signatories' responsible investment activities and support dialogue within signatories' organisations, as well as with their clients, beneficiaries and other stakeholders.

This **Public RI Report** is an export of the signatory's responses to the PRI Reporting Framework during the 2021 reporting period. It includes the signatory's responses to mandatory indicators, as well as responses to voluntary indicators that the signatory has agreed to make public.

The information is presented exactly as it was reported. Where an indicator offered a multiple-choice response, all options that were available to select from are included for context. While presenting the information verbatim results in lengthy reports, the approach is informed by signatory feedback that signatories prefer that the PRI does not summarise the information.

Context

In consultation with signatories, between 2018 and 2020 the PRI extensively reviewed the Reporting and Assessment processes and set the ambitious objective of launching in 2021 a completely new investor Reporting Framework, together with a new reporting tool.

We ran the new investor Reporting and Assessment process as a pilot in its first year, and such process included providing additional opportunities for signatories to provide feedback on the Reporting Framework, the online reporting tool and the resulting reports. The feedback from this pilot phase has been, and is continuing to be analysed, in order to identify any improvements that can be included in future reporting cycles.

PRI disclaimer

This document presents information reported directly by signatories in the 2021 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented.

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

Table of Contents

Module/Indicator	Page
Senior Leadership Statement (SLS)	4
Organisational Overview (OO)	8
Investment and Stewardship Policy (ISP)	35
Manager Selection, Appointment and Monitoring (SAM)	77
Listed Equity (LE)	97
Sustainability Outcomes (SO)	115

Senior Leadership Statement (SLS)

Senior leadership statement

Our commitment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1 S1	CORE	N/A	N/A	PUBLIC	Our commitment	GENERAL

- Why does your organisation engage in responsible investment?
- What is your organisation's overall approach to responsible investment?
- What are the main differences between your organisation's approach to responsible investment in its ESG practice and in other practices, across asset classes?

Responsible investing is at the heart of our firm's growth strategy and our vision to provide world-class responsible investing solutions, with a clear focus on creating investment value. Everyday, we seek to improve the financial security of our clients. Our purpose of improving people's financial security means we must be effective stewards of assets so that we create long-term value for our clients and their beneficiaries. We believe in an integrated approach to responsible investing. It is vital for asset owners to understand the impact of environmental, social and governance (ESG) characteristics on security prices and markets when building an investment portfolio. As a global investment solutions provider, we have found that investing responsibly can help deliver attractive investment returns and meet client objectives in the long-term. To reflect this, we have based our responsible investing practice on a set of four beliefs: 1. ESG factors impact security prices. These factors can vary by company, industry, and region and their importance can vary through time. 2. A deep understanding of how ESG factors impact security prices is value-adding to a skilful investment process. 3. Embedding ESG considerations into the firm's culture and processes improves the likelihood of prolonged and successful investing. 4. Active ownership of securities is an effective tool for improving investment outcomes. Russell Investments' policy is to integrate sustainability risks in our investment solutions by identifying, evaluating and managing relevant risks in our investment manager review process, portfolio management and through implementing proprietary solutions. We believe that sustainability risks are most relevant to investment outcomes when they exhibit financial materiality and like all investment risks, are incorporated by balancing expected risk with expected reward. In managing investment solutions, we consider financially-material sustainability risks in the context of expected rewards using a blend of inputs from sources including, but not limited to, investment managers, third-party data sources and Russell Investments proprietary analysis. Furthermore, we incorporate bespoke sustainability risks based on clients' requirements for customised mandates. Additionally, we seek to collaborate with our advisory clients to consider, monitor and manage sustainability risk priorities in their portfolios. Our tenets and beliefs drive our policies and our investment practices, and ultimately reflect how we act as responsible stewards of assets to create long term value for our clients and beneficiaries.

Annual overview

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1 S2	CORE	N/A	N/A	PUBLIC	Annual overview	GENERAL

- 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. This might involve e.g. outlining your single most important achievement, or describing your general progress, on topics such as the following:
 - refinement of ESG analysis and incorporation
 - stewardship activities with investees and/or with policy makers
 - collaborative engagements
 - attainment of responsible investment certifications and/or awards

We have made significant strides in enhancing our integrated approach to responsible investing over the last year. Our CEO identified responsible investing as one of four global strategic initiatives in 2020. We also conducted a comprehensive data-driven analysis to evaluate our offering and capabilities. The recommendations from this review were subsequently reviewed by an external consulting firm. The proposed enhancements from this strategic review covers multiples areas of our business including: 1. Enhanced governance around advancing our responsible investing practices 2. Improved integrated approach within our investment function 3. Focus on climate risk assessment 4. Enhancements to our active ownership practices 5. Increased focus on ESG considerations within our manager research ranking process 6. Increased focus on training for associates globally, education, and materials 7. Increased dedicated resourcing to further all of our responsible investing efforts We will be actively embedding these enhancements over the course of 2021.

Next steps

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1 S3	CORE	N/A	N/A	PUBLIC	Next steps	GENERAL

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

As an organization we have taken multiple steps to advance our commitment to responsible investment as detailed in our response to Section 2. These enhancements will require both additional staff and investment in data and systems. This clearly demonstrates the executive teams' commitment to advancing our overall proposition. A number of these initiatives are multi year in nature and will take time to complete.

Endorsement

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1 S4	CORE	N/A	N/A	PUBLIC	Endorsement	GENERAL

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 Kate El-Hillow

Position Global Chief Investment Officer

Organisation's name Russell Investments

● This endorsement is for the Senior Leadership Statement only and is not an endorsement of the information reported by Russell Investments in the various modules of the Reporting Framework. The Senior Leadership Statement is simply provided as a general overview of Russell Investments's responsible investment approach. The Senior Leadership Statement does not constitute advice and should not be relied upon as such, and 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.

Organisational Overview (OO)

Organisational information

Categorisation

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 1	CORE	Signatory category	Multiple, see guidance	PUBLIC	Categorisation	GENERAL

Select the type that best describes your organisation or the services you provide.

(O) Fund management

(2) This is an additional (secondary) type

(P) Fund of funds, manager of managers or sub-advised products

(1) This is our only (or primary) type

(Q) Execution and advisory

(2) This is an additional (secondary) type

(R) Wealth management

(2) This is an additional (secondary) type

(S) Fiduciary management or other outsourced discretionary fund allocation

(2) This is an additional (secondary) type

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 that are also PRI signatories in their own right?

☐ (A) Yes

☒ (B) No

Reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 3	CORE	N/A	N/A	PUBLIC	Reporting year	GENERAL

Indicate the year-end date for your reporting year.

	Month	Day	Year
Reporting year end date:	December	31	2020

Assets under management

All asset classes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 4	CORE	OO 4.1, OO 4.2	N/A	PUBLIC	All asset classes	GENERAL

What were your total assets under management (AUM) at the end of the indicated reporting year? Provide the amount in USD.

(A) AUM of your organisation, including subsidiaries US\$ 216,634,000,000.00

(B) AUM of subsidiaries that are PRI signatories in their own right and excluded from this submission US\$ 0.00

(C) AUM subject to execution, advisory, custody, or research advisory only US\$ 2,840,655,000,000.00

Asset breakdown

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

Provide a percentage breakdown of your total assets under management at the end of your indicated reporting year.

Percentage of AUM

(A) Listed equity – internal

0-10%

(B) Listed equity – external

50-75%

(C) Fixed income – internal

0-10%

(D) Fixed income – external	10-50%
(E) Private equity – internal	0.0%
(F) Private equity – external	0-10%
(G) Real estate – internal	0.0%
(H) Real estate – external	0-10%
(I) Infrastructure – internal	0.0%
(J) Infrastructure – external	0-10%
(K) Hedge funds – internal	0.0%
(L) Hedge funds – external	0-10%
(M) Forestry – internal	0.0%
(N) Forestry – external	0.0%
(O) Farmland – internal	0.0%
(P) Farmland – external	0.0%
(Q) Other – internal, please specify:	
Commodities, currency, cash, other alternatives	0-10%
(R) Other – external, please specify:	0.0%
(S) Off-balance sheet – internal	0.0%
(T) Off-balance sheet – external	0.0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.1	CORE	OO 5	Multiple, see guidance	PUBLIC	Asset breakdown	GENERAL

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

	(1) Listed equity	(2) Fixed income	(3) Private equity	(4) Real estate	(5) Infrastru cture	(6) Hedge funds
(A) Segregated mandate(s)	10-50%	10-50%	50-75%	10-50%	0-10%	>75%
(B) Pooled fund(s) or pooled investment(s)	50-75%	50-75%	10-50%	50-75%	>75%	10-50%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.2 LE	CORE	OO 5, OO 5.1	Multiple, see guidance	PUBLIC	Asset breakdown	GENERAL

Provide a further breakdown of your listed equity assets.

	(A) Internal allocation	(B) External allocation – segregated	(C) External allocation – pooled
(1) Passive equity	0.0%	0.0%	0.0%
(2) Active – quantitative	>75%	0-10%	0-10%
(3) Active – fundamental	0.0%	>75%	>75%
(4) Investment trusts (REITs and similar publicly quoted vehicles)	0.0%	0-10%	0-10%
(5) Other, please specify:	0.0%	0.0%	0.0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.2 FI	CORE	OO 5, OO 5.1	Multiple, see guidance	PUBLIC	Asset breakdown	GENERAL

Provide a further breakdown of your fixed income assets.

	(A) Internal allocation	(B) External allocation – segregated	(C) External allocation – pooled
(1) Passive – SSA	50-75%	0.0%	0.0%
(2) Passive – corporate	10-50%	0.0%	0.0%
(3) Passive – securitised	0.0%	0.0%	0.0%
(4) Active – SSA	0.0%	10-50%	10-50%
(5) Active – corporate	0.0%	10-50%	10-50%
(6) Active – securitised	0.0%	10-50%	10-50%
(7) Private debt	0.0%	0-10%	0.0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.2 PE	CORE	OO 5, OO 5.1	N/A	PUBLIC	Asset breakdown	GENERAL

Provide a further breakdown of your private equity assets.

	(B) External allocation – segregated	(C) External allocation – pooled
(1) Venture capital	0.0%	0-10%
(2) Growth capital	0.0%	0-10%
(3) (Leveraged) buyout	0.0%	10-50%

(4) Distressed, turnaround or special situations	0.0%	10-50%
(5) Secondaries	0.0%	0-10%
(6) Other, please specify:	>75%	50-75%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.2 RE	CORE	OO 5, OO 5.1	N/A	PUBLIC	Asset breakdown	GENERAL

Provide a further breakdown of your real estate assets.

	(B) External allocation – segregated	(C) External allocation – pooled
(1) Retail	10-50%	10-50%
(2) Office	10-50%	10-50%
(3) Industrial	10-50%	10-50%
(4) Residential	10-50%	10-50%
(5) Hotel	0.0%	0.0%
(6) Lodging, leisure and recreation	0-10%	0-10%
(7) Education	0.0%	0.0%
(8) Technology/science	0.0%	0.0%
(9) Healthcare	0-10%	0-10%
(10) Mixed use	0-10%	0-10%
(11) Other, please specify:	0-10%	0-10%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.2 INF	CORE	OO 5, OO 5.1	N/A	PUBLIC	Asset breakdown	GENERAL

Provide a further breakdown of your infrastructure assets.

	(B) External allocation – segregated	(C) External allocation – pooled
(1) Data infrastructure	0.0%	0.0%
(2) Energy and water resources	0.0%	0.0%
(3) Environmental services	0.0%	0.0%
(4) Network utilities	0.0%	0.0%
(5) Power generation (excl. renewables)	0.0%	0.0%
(6) Renewable power	0-10%	0-10%
(7) Social infrastructure	0-10%	0-10%
(8) Transport	0.0%	0.0%
(9) Other, please specify:	>75%	>75%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.2 HF	CORE	OO 5, OO 5.1	OO 9 HF, OO 10	PUBLIC	Asset breakdown	GENERAL

Provide a further breakdown of your hedge fund assets.

	(B) External allocation – segregated	(C) External allocation – pooled
(1) Multi strategy	10-50%	10-50%
(2) Long/short equity	10-50%	10-50%

(3) Long/short credit	10-50%	10-50%
(4) Distressed, special situations and event-driven fundamental	0-10%	0-10%
(5) Structured credit	10-50%	10-50%
(6) Global macro	10-50%	10-50%
(7) Commodity trading advisor	0-10%	0-10%
(8) Other, please specify:	10-50%	10-50%

ESG strategies

Listed equity

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 6 LE	CORE	OO 5.2 LE	OO 6.1 LE, LE 13	PUBLIC	Listed equity	1

Which ESG incorporation strategy and/or combination of strategies do you apply to your internally managed active listed equity?

Percentage out of total internally managed active listed equity:

(A) Screening alone	0.0%
(B) Thematic alone	0.0%
(C) Integration alone	0.0%
(D) Screening and integration	>75%
(E) Thematic and integration	0.0%
(F) Screening and thematic	0.0%
(G) All three strategies combined	0.0%

(H) None 0.0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 6.1 LE	CORE	OO 6 LE	LE 8	PUBLIC	Listed equity	1

What type of screening is applied to your internally managed active listed equity assets?

Percentage coverage out of your total listed equities where screening strategy is applied

(A) Positive/best-in-class screening only 0.0%

(B) Negative screening only 50-75%

(C) A combination of positive/best-in-class and negative screening 25-50%

Externally managed assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 6 SAM	CORE	OO 5.2 LE, OO 5.2 FI	OO 6.1 SAM	PUBLIC	Externally managed assets	1

Which ESG incorporation strategy and/or combination of strategies apply to your externally managed active listed equity and fixed income?

	(1) Listed equity - external	(2) Fixed income – SSA - external	(3) Fixed income – corporate - external	(4) Fixed income – securitised - external
(A) Screening alone	0.0%	0.0%	0.0%	0.0%
(B) Thematic alone	0.0%	0.0%	0.0%	0.0%
(C) Integration alone	>75%	>75%	>75%	>75%

(D) Screening and integration	0-25%	0.0%	0.0%	0.0%
(E) Thematic and integration	0.0%	0.0%	0.0%	0.0%
(F) Screening and thematic	0-25%	0.0%	0.0%	0.0%
(G) All three strategies combined	0-25%	0.0%	0.0%	0.0%
(H) None	0.0%	0.0%	0.0%	0.0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 6.1 SAM	CORE	OO 6 SAM	N/A	PUBLIC	Externally managed assets	1

What type of screening is applied to your externally managed active listed equity and fixed income?

(1) Listed equity - external

(A) Positive/best-in-class screening only	0.0%
(B) Negative screening only	50-75%
(C) A combination of positive/best-in-class and negative screening	25-50%

Externally managed assets

Captive relationships

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 7	CORE	OO 5	Multiple, see guidance	PUBLIC	Captive relationships	GENERAL

Does your organisation have a captive relationship with some or all of its external investment managers?

- ☐ (A) Yes
☒ (B) No

Investment consultants

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 8	CORE	OO 5	SAM 1	PUBLIC	Investment consultants	GENERAL

Does your organisation engage investment consultants in the selection, appointment or monitoring of your external investment managers?

- ☐ (A) Yes
☒ (B) No

Stewardship

Listed equity

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9 LE	CORE	OO 5, OO 5.2 LE	Multiple, see guidance	PUBLIC	Listed equity	2

Does your organisation conduct stewardship activities for your listed equity assets?

	(1) Engagement on listed equity – active	(3) (Proxy) voting on listed equity – active
(A) Through service providers	☒	☒
(B) Through external managers	☐	☐
(C) Through internal staff	☒	☒
(D) Collaboratively	☒	☒
(E) We did not conduct this stewardship activity	☐	☐

Fixed income

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9 FI	CORE	OO 5, OO 5.2 FI	Multiple, see guidance	PUBLIC	Fixed income	2

Does your organisation conduct stewardship activities for your fixed income assets?

	(1) Passive – SSA	(2) Passive – corporate	(4) Active – SSA	(5) Active – corporate	(6) Active – securitised	(7) Private debt
(A) Through service providers	☐	☐	☐	☐	☐	☐

(B) Through external managers	☐	☐	☐	☐	☐	☐
(C) Through internal staff	☐	☐	☐	☐	☐	☐
(D) Collaboratively	☐	☐	☐	☐	☐	☐
(E) We did not conduct this stewardship activity for this strategy/asset type	☒	☒	☒	☒	☒	☒

Private equity, real estate and infrastructure

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9 ALT	CORE	OO 5	Multiple, see guidance	PUBLIC	Private equity, real estate and infrastructure	2

Does your organisation conduct stewardship activities in the following asset classes?

	(1) Private equity	(2) Real estate	(3) Infrastructure
(A) Through service providers	☐	☐	☐
(B) Through external managers	☐	☐	☐
(C) Through internal staff	☐	☐	☐
(D) Collaboratively	☐	☐	☐
(E) We did not conduct stewardship activities for this asset class	☒	☒	☒

Hedge funds

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9 HF	CORE	OO 5, OO 5.2 HF	Multiple, see guidance	PUBLIC	Hedge funds	2

Does your organisation conduct stewardship activities for your hedge fund assets?

	(1) Engagement	(2) (Proxy) voting
(A) Through service providers	☐	☐
(B) Through external managers	☐	☐
(C) Through internal staff	☐	☐
(D) Collaboratively	☐	☐
(E) We did not conduct this stewardship activity	☒	☒

ESG incorporation

Internally managed assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 10	CORE	Multiple, see guidance	Multiple, see guidance	PUBLIC	Internally managed assets	1

For each internally managed asset class, select whether or not you incorporate ESG into your investment decisions.

	(1) ESG incorporated into investment decisions	(2) ESG not incorporated into investment decisions
(B) Listed equity – active – quantitative	☒	☐

(F) Fixed income – SSA	☐	☒
(G) Fixed income – corporate	☐	☒
(W) Other [as specified]	☐	☒

External manager selection

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 11	CORE	Multiple, see guidance	Multiple, see guidance	PUBLIC	External manager selection	1

For each externally managed asset class, select whether or not you incorporate ESG into external manager selection. Your response should refer to the selection of the external managers who managed the relevant asset classes during the reporting year, regardless of when such selection took place.

	(1) ESG incorporated into external manager selection	(2) ESG not incorporated into external manager selection
(B) Listed equity – active	☒	☐
(D) Fixed income – active	☒	☐
(E) Private equity	☒	☐
(F) Real estate	☒	☐
(G) Infrastructure	☒	☐
(H) Hedge funds	☒	☐

External manager appointment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 12	CORE	Multiple, see guidance	Multiple, see guidance	PUBLIC	External manager appointment	1

For each externally managed asset class, select whether or not you incorporate ESG into external manager appointment. Your response should refer to the appointment of the external managers who managed the relevant asset classes during the reporting year, regardless of when their appointment took place.

	(1) ESG incorporated into external manager appointment	(2) ESG not incorporated into external manager appointment
(B) Listed equity – active	☒	☐
(D) Fixed income – active	☒	☐
(E) Private equity	☒	☐
(F) Real estate	☒	☐
(G) Infrastructure	☒	☐
(H) Hedge funds	☒	☐

External manager monitoring

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 13	CORE	Multiple, see guidance	Multiple, see guidance	PUBLIC	External manager monitoring	1

For each externally managed asset class, select whether or not you incorporated ESG into external manager monitoring during the reporting year.

	(1) ESG incorporated into external manager monitoring	(2) ESG not incorporated into external manager monitoring
(B) Listed equity – active	☒	☐
(D) Fixed income – active	☒	☐
(E) Private equity	☒	☐
(F) Real estate	☒	☐
(G) Infrastructure	☒	☐
(H) Hedge funds	☒	☐

Voluntary reporting

Voluntary modules

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 14	CORE	Multiple, see guidance	Multiple, see guidance	PUBLIC	Voluntary modules	GENERAL

The following modules are voluntary to report on in the separate PRI asset class modules as they account for less than 10% of your total AUM and are under USD 10 billion. Please select if you wish to voluntarily report on the module.

	(1) Yes, report on the module	(2) No, opt out of reporting on the module
(A) Listed equity	☒	☐
(L) External manager selection, appointment and monitoring (SAM) – private equity	☒	☐
(M) External manager selection, appointment and monitoring (SAM) – real estate	☒	☐
(N) External manager selection, appointment and monitoring (SAM) – infrastructure	☒	☐
(O) External manager selection, appointment and monitoring (SAM) – hedge funds	☒	☐

The following modules are mandatory to report on as they account for 10% or more of your total AUM or are over USD 10 billion. The ISP (Investment and Stewardship Policy) module is always applicable for reporting.

	(1) Yes, report on the module
ISP: Investment and Stewardship Policy	☒

(J) External manager selection, appointment and monitoring (SAM) – listed equity

●

(K) External manager selection, appointment and monitoring (SAM) – fixed income

●

ESG/sustainability funds and products

Labelling and marketing

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 16	CORE	Multiple, see guidance	Multiple, see guidance	PUBLIC	Labelling and marketing	GENERAL

What percentage of your assets under management in each asset class are ESG/sustainability marketed funds or products, and/or ESG/RI certified or labelled assets? Percentage figures can be rounded to the nearest 5% and should combine internally and externally managed assets.

Percentage	
(B) Listed equity – active	0-25%
(D) Fixed income – active	0.0%
(E) Private equity	0.0%
(F) Real estate	0.0%
(G) Infrastructure	0.0%
(H) Hedge funds	0.0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 16.1	CORE	OO 16	ISP 52	PUBLIC	Labelling and marketing	GENERAL

What percentage of your total assets (per asset class) carry a formal ESG/RI certification or label? Percentage figures can be rounded to the nearest 5%.

Coverage of ESG/RI certification or label:

(A) Listed equity 0-25%

Climate investments

Asset breakdown

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17	CORE	N/A	N/A	PUBLIC	Asset breakdown	GENERAL

What percentage of your assets under management is in targeted low-carbon or climate-resilient investments?

0-25%

Other asset breakdowns

Geographical breakdown

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18	CORE	Multiple, see guidance	N/A	PUBLIC	Geographical breakdown	GENERAL

What is the geographical breakdown of your organisation's assets under management by investment destination (i.e. where the investments are located)?

	(1) Listed equity	(2) Fixed income – SSA	(3) Fixed income – corporate	(4) Fixed income – securitised	(5) Fixed income – private debt
(A) Developed	>75%	>75%	>75%	>75%	>75%
(B) Emerging	0-25%	0-25%	0-25%	0-25%	0.0%
(C) Frontier	0.0%	0.0%	0.0%	0.0%	0.0%
(D) Other	0.0%	0.0%	0.0%	0.0%	0.0%
	(6) Private equity	(7) Real estate	(8) Infrastructure	(9) Hedge funds	
(A) Developed	>75%	>75%	>75%	>75%	
(B) Emerging	0.0%	0.0%	0.0%	0.0%	
(C) Frontier	0.0%	0.0%	0.0%	0.0%	
(D) Other	0.0%	0.0%	0.0%	0.0%	

Management by PRI signatories

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 19	CORE	OO 5	N/A	PUBLIC	Management by PRI signatories	GENERAL

What approximate percentage (+/-5%) of your externally managed assets are managed by PRI signatories?

>75%

Fixed income constraints

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 20	CORE	OO 5.2 FI	OO 20.1	PUBLIC	Fixed income constraints	GENERAL

What percentage of your fixed income assets are subject to constraints? The constraints may be regulatory requirements, credit quality restrictions, currency constraints or similar.

Internal and external fixed income assets subject to constraints

(A) Fixed income – SSA >75%

(B) Fixed income – corporate >75%

(C) Fixed income – securitised >75%

(D) Fixed income – private debt >75%

Context and explanation

ESG not incorporated

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 35	CORE	Multiple, see guidance	N/A	PUBLIC	ESG not incorporated	1, 2

Describe why you currently do not incorporate ESG into your assets and/or why you currently do not conduct stewardship.

Description

(C) Internally managed: Fixed income – SSA

Our internally managed FI strategies are passive. Passive products are designed specifically to track targeted indices. Our active ownership practices are currently focused on our listed equity assets.

(D) Internally managed: Fixed income – corporate

Our internally managed FI strategies are systematic and passive. The systematic strategies we employ include credit, region, duration and liquidity status for security selection. Passive products are designed specifically to track targeted indices. Our active ownership practices are currently focused on our listed equity assets.

(M) Internally managed: Other

Our internally managed "other" strategies are systematic and passive. The systematic strategies we employ include currency, cash and other alternatives. Our active ownership practices are currently focused on our listed equity assets.

(Q) Externally managed: Fixed income – active

ESG issues are incorporated into our research through our investment manager evaluation process, where the ESG information is considered a key driver of our ranks, alongside portfolio construction, research, risk management, organizational structure and staffing. The potential for ESG issues to impact opportunities and risks of manager strategies is at the heart of our approach. Through a combination of investment manager interviews, survey responses, and quantitative analysis of manager portfolios, Russell Investments' analysts determine whether the manager appropriately assesses the risk and return impacts of ESG issues. ESG is formally incorporated into our investment manager evaluation process through rankings of separate ESG categories assessing both the quality and competitive edge of a manager's ESG investment skills. **(response continued in row below)**

The ESG rank is considered in our subadvisor selection process and is highlighted in our governance of funds. In addition to reviewing ESG in selecting subadvisors, we continually review Sustainability Risks in our funds with the support of our subadvisors and internal reporting, while aligning our evaluation of Sustainability Risks with a variety of themes, including the themes we support in our active ownership practices. Our active ownership practices are currently applied in our listed equity assets..

(R) Externally managed: Private equity

ESG issues are incorporated into our research through our investment manager evaluation process, where the ESG information is considered a key driver of our ranks, alongside portfolio construction, research, risk management, organizational structure and staffing. The potential for ESG issues to impact opportunities and risks of manager strategies is at the heart of our approach. Through a combination of investment manager interviews, survey responses, and quantitative analysis of manager portfolios, Russell Investments' analysts determine whether the manager appropriately assesses the risk and return impacts of ESG issues. ESG is formally incorporated into our investment manager evaluation process through rankings of separate ESG categories assessing both the quality and competitive edge of a manager's ESG investment skills. **(response continued in row below)**

The ESG rank is considered in our subadvisor selection process and is highlighted in our governance of funds. In addition to reviewing ESG in selecting subadvisors, we continually review Sustainability Risks in our funds with the support of our subadvisors and internal reporting, while aligning our evaluation of Sustainability Risks with a variety of themes, including the themes we support in our active ownership practices. Our active ownership practices are currently applied in our listed equity assets..

(S) Externally managed: Real estate

ESG issues are incorporated into our research through our investment manager evaluation process, where the ESG information is considered a key driver of our ranks, alongside portfolio construction, research, risk management, organizational structure and staffing. The potential for ESG issues to impact opportunities and risks of manager strategies is at the heart of our approach. Through a combination of investment manager interviews, survey responses, and quantitative analysis of manager portfolios, Russell Investments' analysts determine whether the manager appropriately assesses the risk and return impacts of ESG issues. ESG is formally incorporated into our investment manager evaluation process through rankings of separate ESG categories assessing both the quality and competitive edge of a manager's ESG investment skills. **(response continued in row below)**

The ESG rank is considered in our subadvisor selection process and is highlighted in our governance of funds. In addition to reviewing ESG in selecting subadvisors, we continually review Sustainability Risks in our funds with the support of our subadvisors and internal reporting, while aligning our evaluation of Sustainability Risks with a variety of themes, including the themes we support in our active ownership practices. Our active ownership practices are currently applied in our listed equity assets..

(T) Externally managed: Infrastructure

ESG issues are incorporated into our research through our investment manager evaluation process, where the ESG information is considered a key driver of our ranks, alongside portfolio construction, research, risk management, organizational structure and staffing. The potential for ESG issues to impact opportunities and risks of manager strategies is at the heart of our approach. Through a combination of investment manager interviews, survey responses, and quantitative analysis of manager portfolios, Russell Investments' analysts determine whether the manager appropriately assesses the risk and return impacts of ESG issues. ESG is formally incorporated into our investment manager evaluation process through rankings of separate ESG categories assessing both the quality and competitive edge of a manager's ESG investment skills. **(response continued in row below)**

The ESG rank is considered in our subadvisor selection process and is highlighted in our governance of funds. In addition to reviewing ESG in selecting subadvisors, we continually review Sustainability Risks in our funds with the support of our subadvisors and internal reporting, while aligning our evaluation of Sustainability Risks with a variety of themes, including the themes we support in our active ownership practices. Our active ownership practices are currently applied in our listed equity assets..

(U) Externally managed: Hedge funds

ESG issues are incorporated into our research through our investment manager evaluation process, where the ESG information is considered a key driver of our ranks, alongside portfolio construction, research, risk management, organizational structure and staffing. The potential for ESG issues to impact opportunities and risks of manager strategies is at the heart of our approach. Through a combination of investment manager interviews, survey responses, and quantitative analysis of manager portfolios, Russell Investments' analysts determine whether the manager appropriately assesses the risk and return impacts of ESG issues. ESG is formally incorporated into our investment manager evaluation process through rankings of separate ESG categories assessing both the quality and competitive edge of a manager's ESG investment skills. **(response continued in row below)**

The ESG rank is considered in our subadvisor selection process and is highlighted in our governance of funds. In addition to reviewing ESG in selecting subadvisors, we continually review Sustainability Risks in our funds with the support of our subadvisors and internal reporting, while aligning our evaluation of Sustainability Risks with a variety of themes, including the themes we support in our active ownership practices. Our active ownership practices are currently applied in our listed equity assets..

Investment and Stewardship Policy (ISP)

Responsible investment policy & governance

Responsible investment policy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 1	CORE	N/A	ISP 1.1, ISP 1.2	PUBLIC	Responsible investment policy	1

Does your organisation have a formal policy or policies covering your approach to responsible investment? Your approach to responsible investment may be set out in a standalone guideline, covered in multiple standalone guidelines or be part of a broader investment policy. Your policy may cover various responsible investment elements such as stewardship, ESG guidelines, sustainability outcomes, specific climate-related guidelines, RI governance and similar.

- ☒ (A) Yes, we do have a policy covering our approach to responsible investment
- ☐ (B) No, we do not have a policy covering our approach to responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 1.1	CORE	ISP 1	Multiple, see guidance	PUBLIC	Responsible investment policy	1

What elements does your responsible investment policy cover? The responsible investment elements may be set out in one or multiple standalone guidelines, or they may be part of a broader investment policy.

- ☒ (A) Overall approach to responsible investment
- ☐ (B) Guidelines on environmental factors
- ☐ (C) Guidelines on social factors
- ☐ (D) Guidelines on governance factors
- ☒ (E) Approach to stewardship
- ☒ (F) Approach to sustainability outcomes
- ☒ (G) Approach to exclusions
- ☐ (H) Asset class-specific guidelines that describe how ESG incorporation is implemented
- ☒ (I) Definition of responsible investment and how it relates to our fiduciary duty
- ☒ (J) Definition of responsible investment and how it relates to our investment objectives
- ☒ (K) Responsible investment governance structure
- ☒ (L) Internal reporting and verification related to responsible investment
- ☒ (M) External reporting related to responsible investment
- ☐ (N) Managing conflicts of interest related to responsible investment
- ☐ (O) Other responsible investment aspects not listed here, please specify:

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 1.2	PLUS	ISP 1	N/A	PUBLIC	Responsible investment policy	1

What mechanisms do you have in place to ensure that your policies are implemented in an aligned and consistent way across the organisation?

Russell Investments has a robust governance structure with appropriate lines of segregation. Specifically we have global policies and procedures set at the highest levels within the organization along with robust governance tools and processes to ensure adherence, and the ability to ensure they are appropriately applied in every region and every asset class.

The Global Risk Management Committee (GRMC) and Internal Audit Committee are the two main groups responsible for the firm's internal control structure, and both report to the Executive Committee and the Board of Directors. The GRMC oversees Russell Investments' risk management program and reports regularly to the Internal Audit Committee. Together, they work to establish our overall risk vision, risk management framework and risk management objectives. The GRMC comprises senior officers who meet quarterly to review and evaluate material risks inherent in our business lines.

The Internal Audit team conducts structured reviews of key processes and risks, including detailed testing of mitigating controls. Russell Investments has built the entire investment process over five decades to ensure effective execution of the investment management process. The investment division is organized to design, construct and manage portfolios specific to client needs.

The investment division is governed by the Investment Strategy Committee (ISC). The ISC is authorized by the Executive Committee and has the responsibility for the oversight of investment-related activities at Russell Investments, as well as reviewing investment performance and establishing investment policy and strategy. Its members include the Global Chief Investment Officer, who serves as the Chairperson, and senior investment division and risk professionals. The ISC delegates to numerous subcommittees to review and recommend proposals to create new investment products, new fund launches and hire/terminate investment managers.

The groups reporting to the ISC have written charters outlining their oversight obligations, as well as many groups having annual objectives. Our governance process features performance measurement with much attention given to metrics that reflect the outcomes our clients seek and ensure accountability. We review these metrics and outcomes with the accountable parties on a regular cycle and continually revisit mandates, objectives and performance metrics to confirm their alignment with the mission of each group. Each group has documentation practices outlined in the charter to record approvals, decisions, and oversight activities. We favour an integrated approach to responsible investing and have several ESG experts embedded throughout our organization.

The Global Responsible Investing Steering Group consists of representatives from various business units such as solutions, client-facing, marketing, the investment division and compliance and legal. The purpose of this group is to facilitate and maintain the ability of Russell Investments to provide a world-class and harmonized approach to responsible investing solutions and sustainability, with a clear focus on creating investment value. This global group has two executive-level sponsors, the Global Chief Investment Officer and Head of EMEA. This group is chaired by the Head of Responsible Investing.

In addition to the steering group, we have multiple responsible investing related working groups tasked with the specific delivery of research (including climate-related), strategy development and compliance with the fast-changing regulatory landscape. These working groups include the Global Regulatory Steering Committee, Investment Division Responsible Investing Council, ESG Marketing Taskforce and Corporate Social Responsibility. The ID Responsible Investing Council, which reports to the ISC, guides the Investment Division's initiatives related to responsible investing. The Proxy Voting & Engagement Committee establishes and oversees our proxy voting policies, procedures, guidelines and voting decisions, and reports directly to the Global Chief Investment Officer.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 2	CORE	ISP 1.1	N/A	PUBLIC	Responsible investment policy	6

Indicate which of your responsible investment policy elements are publicly available and provide links.

☒ (A) Overall approach to responsible investment. Add link(s):

"Best practices for responsible investing": <https://russellinvestments.com/-/media/files/us/insights/institutions/non-profit/best-practices-for-responsible-investing-executive-summary.pdf?la=en&hash=AF035A7366078F702F21CEF214B6193CCB194AB1>

☐ (E) Approach to stewardship. Add link(s):

☐ (F) Approach to sustainability outcomes. Add link(s):

☐ (G) Approach to exclusions. Add link(s):

☐ (I) Definition of responsible investment and how it relates to our fiduciary duty. Add link(s):

☐ (J) Definition of responsible investment and how it relates to our investment objectives. Add link(s):

☐ (K) Responsible investment governance structure. Add link(s):

☐ (L) Internal reporting and verification related to responsible investment. Add link(s):

☐ (M) External reporting related to responsible investment. Add link(s):

☐ (P) Our responsible investment policy elements are not publicly available

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 3	CORE	ISP 1.1	N/A	PUBLIC	Responsible investment policy	1

What percentage of your total assets under management are covered by your policy elements on overall approach to responsible investment and/or guidelines on environmental, social and governance factors?

☐ (A) Overall approach to responsible investment

AUM coverage of all policy elements in total:

☐ >75%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 4	CORE	ISP 1.1	N/A	PUBLIC	Responsible investment policy	1

Which elements does your exclusion policy include?

☒ (A) Legally required exclusions (e.g. those required by domestic/international law, bans, treaties or embargoes)

☐ (B) Exclusions based on our organisation's values or beliefs (e.g. regarding weapons, alcohol, tobacco and/or avoiding other particular sectors, products, services or regions)

☒ (C) Exclusions based on screening against minimum standards of business practice based on international norms (e.g. OECD guidelines, the UN Human Rights Declaration, Security Council sanctions or the UN Global Compact)

Governance

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 6	CORE	N/A	ISP 8	PUBLIC	Governance	1

Do your organisation's board, chief-level staff, investment committee and/or head of department have formal oversight and accountability for responsible investment?

- ☐ (A) Board and/or trustees
☒ (B) Chief-level staff (e.g. Chief Executive Officer (CEO), Chief Investment Officer (CIO) or Chief Operating Officer (COO))
☒ (C) Investment committee
☒ (D) Other chief-level staff, please specify:
 Head of EMEA
☒ (E) Head of department, please specify department:
 Head of Research, Head of Portfolio Management
☐ (F) None of the above roles have oversight and accountability for responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 7	CORE	N/A	ISP 8	PUBLIC	Governance	1

In your organisation, which internal or external roles have responsibility for implementing responsible investment?

- ☐ (A) Board and/or trustees
☒ (B) Chief-level staff (e.g. Chief Executive Officer (CEO), Chief Investment Officer (CIO) or Chief Operating Officer (COO))
☒ (C) Investment committee
☒ (D) Other chief-level staff [as specified]
☒ (E) Head of department [as specified]
☒ (F) Portfolio managers
☒ (G) Investment analysts
☒ (H) Dedicated responsible investment staff
☐ (I) Investor relations
☒ (J) External managers or service providers
☒ (K) Other role, please specify:
 Proxy voting partner, Glass Lewis
☐ (L) Other role, please specify:
☐ (M) We do not have roles with responsibility for implementing responsible investment.

People and capabilities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 8	CORE	ISP 6, ISP 7	ISP 8.1, ISP 8.2	PUBLIC	People and capabilities	General

What formal objectives for responsible investment do the roles in your organisation have?

	(2) Chief-level staff	(3) Investment committee	(4) Other chief-level staff [as specified]	(5) Head of department [as specified]	(6) Portfolio managers
(A) Objective for ESG incorporation in investment activities	☒	☒	☐	☒	☒
(B) Objective for contributing to the development of the organisation's ESG incorporation approach	☒	☒	☒	☒	☒
(C) Objective for contributing to the organisation's stewardship activities (e.g. through sharing findings from continuous ESG research or investment decisions)	☒	☐	☐	☒	☒
(D) Objective for ESG performance	☒	☐	☐	☒	☒
(E) Other objective related to responsible investment [as specified]	☐	☐	☒	☐	☒
(F) Other objective related to responsible investment [as specified]	☐	☐	☐	☐	☐
(G) No formal objectives for responsible investment exist for this role	☐	☐	☐	☐	☐

	(7) Investment analysts	(8) Dedicated responsible investment staff	(10) External managers or service providers	(11) Other role
(A) Objective for ESG incorporation in investment activities	☒	☒	☐	☐
(B) Objective for contributing to the development of the organisation's ESG incorporation approach	☒	☒	☐	☐
(C) Objective for contributing to the organisation's stewardship activities (e.g. through sharing findings from continuous ESG research or investment decisions)	☒	☒	☒	☒
(D) Objective for ESG performance	☒	☒	☒	☐
(E) Other objective related to responsible investment [as specified]	☐	☒	☐	☐
(F) Other objective related to responsible investment [as specified]	☒	☐	☐	☐
(G) No formal objectives for responsible investment exist for this role	☐	☐	☐	☐

Please specify for "(E) Other objective related to responsible investment".

Bringing ESG-related products to market.

Please specify for "(F) Other objective related to responsible investment".

Developing in-house climate change risk reporting, research and modeling.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 8.1	PLUS	ISP 8	N/A	PUBLIC	People and capabilities	General

Describe the key responsible investment performance indicators (KPIs) or benchmarks that your organisation uses to compare and assess the performance of your professionals in relation to their responsible investment objectives.

Russell Investments utilizes several KPIs to compare and assess the performance of our investment professionals in relation to their responsible investment objectives. Manager research analysts are assessed on the coverage and quality of the ESG dis-aggregated rank. The ESG dis-aggregated rank is a top-tier contributor to the overall rank of all members of our active product universes. Portfolio managers are assessed on their participation in ESG training, their consideration of ESG as part of their subadvisor selection and oversight, their ability to evidence the inclusion of Sustainability Risks in their strategies, and their participation in shareholder engagement activities. Quantitative research analysts focused on ESG topics are assessed on the quality of their research and content created on ESG-related topics including strategy development, metrics development and the assessment of climate change risk. All of these investment professionals have ESG-related objectives clearly articulated in their goals. As well, multiple investment professionals across the Investment Division are members of our Proxy and Engagement Committee--as part of this committee, these investment professionals have KPIs related to the quantity and quality of our engagements. Certain Russell Investments sales and client-service associates have AUM goals for ESG-related products, are required to attend ESG training, and are tasked with working with their clients on their ESG-related goals.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 8.2	CORE	ISP 8	N/A	PUBLIC	People and capabilities	General

Which responsible investment objectives are linked to variable compensation for roles in your organisation?

RI objectives linked to variable compensation for
roles in your organisation:

(2) Chief-level staff (e.g. Chief Executive Officer (CEO), Chief Investment Officer (CIO) or Chief Operating Officer (COO))

(A) Objective for ESG incorporation in investment activities ☒

(B) Objective for contributing to the development of the organisation's
ESG incorporation approach ☒

(C) Objective for contributing to the organisation's stewardship activities
(e.g. through sharing findings from continuous ESG research or
investment decisions) ☒

(D) Objective for ESG performance ☒

(3) Investment committee

(A) Objective for ESG incorporation in investment activities ☒

(B) Objective for contributing to the development of the organisation's
ESG incorporation approach ☒

(4) Other chief-level staff

(B) Objective for contributing to the development of the organisation's
ESG incorporation approach ☒

(E) Other objective related to responsible investment (as specified in ISP 8
option E) ☒

(5) Head of department

(A) Objective for ESG incorporation in investment activities	☒
--	-------------------------------------

(B) Objective for contributing to the development of the organisation's ESG incorporation approach	☒
--	-------------------------------------

(C) Objective for contributing to the organisation's stewardship activities (e.g. through sharing findings from continuous ESG research or investment decisions)	☒
--	-------------------------------------

(D) Objective for ESG performance	☒
-----------------------------------	-------------------------------------

(6) Portfolio managers

(A) Objective on ESG incorporation in investment activities	☒
---	-------------------------------------

(B) Objective for contributing to the development of the organisation's ESG incorporation approach	☒
--	-------------------------------------

(C) Objective for contributing to the organisation's stewardship activities (e.g. through sharing findings from continuous ESG research or investment decisions)	☒
--	-------------------------------------

(D) Objective for ESG performance	☒
-----------------------------------	-------------------------------------

(E) Other objective related to responsible investment (as specified in ISP 8 option E)	☒
--	-------------------------------------

(7) Investment analysts

(A) Objective for ESG incorporation in investment activities ☒

(B) Objective for contributing to the development of the organisation's ESG incorporation approach ☒

(C) Objective for contributing to the organisation's stewardship activities (e.g. through sharing findings from continuous ESG research or investment decisions) ☒

(D) Objective for ESG performance ☒

(F) Other objective related to responsible investment (as specified in ISP 8 option F) ☒

(8) Dedicated responsible investment staff

(A) Objective for ESG incorporation in investment activities ☒

(B) Objective for contributing to the development of the organisation's ESG incorporation approach ☒

(C) Objective for contributing to the organisation's stewardship activities (e.g. through sharing findings from continuous ESG research or investment decisions) ☒

(D) Objective for ESG performance ☒

(E) Other objective related to responsible investment (as specified in ISP 8 option E) ☒

(10) External managers or service providers

(C) Objective for contributing to the organisation's stewardship activities (e.g. through sharing findings from continuous ESG research or investment decisions) ☒

(D) Objective for ESG performance ☒

(11) Other role

(C) Objective for contributing to the organisation's stewardship activities (e.g. through sharing findings from continuous ESG research or investment decisions) ☒

(G) We have not linked any RI objectives to variable compensation ☐

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 9	CORE	N/A	N/A	PUBLIC	People and capabilities	General

How frequently does your organisation assess the responsible investment capabilities and training needs among your investment professionals?

- ☐ (A) Quarterly or more frequently
- ☒ (B) **Bi-annually**
- ☐ (C) Annually
- ☐ (D) Less frequently than annually
- ☐ (E) On an ad hoc basis
- ☐ (F) We do not have a process for assessing the responsible investment capabilities and training needs among our investment professionals

Strategic asset allocation

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 10	CORE	N/A	ISP 10.1	PUBLIC	Strategic asset allocation	1

Does your organisation incorporate ESG factors into your strategic asset allocation?

- ☐ (A) We incorporate ESG factors into calculations for expected risks and returns of asset classes
- ☐ (B) We specifically incorporate physical, transition and regulatory changes related to climate change into calculations for expected risks and returns of asset classes
- ☒ (C) **No, we do not incorporate ESG considerations into our strategic asset allocation**
- ☐ (D) Not applicable, we do not have a strategic asset allocation process

Stewardship

Stewardship policy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 11	CORE	Multiple, see guidance	N/A	PUBLIC	Stewardship policy	2

What percentage of your assets under management does your stewardship policy cover?

(A) Listed equity >75%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 12	CORE	ISP 1.1	ISP 12.1	PUBLIC	Stewardship policy	2

Which elements does your organisation's stewardship policy cover? The policy may be a standalone guideline or part of a wider RI policy.

- ☒ (A) Key stewardship objectives
- ☒ (B) Prioritisation approach of ESG factors and their link to engagement issues and targets
- ☐ (C) Prioritisation approach depending on entity (e.g. company or government)
- ☒ (D) Specific approach to climate-related risks and opportunities
- ☐ (E) Stewardship tool usage across the organisation, including which, if any, tools are out of scope and when and how different tools are used and by whom (e.g. specialist teams, investment teams, service providers, external investment managers or similar)
- ☐ (F) Stewardship tool usage for specific internal teams (e.g. specialist teams, investment teams or similar)
- ☐ (G) Stewardship tool usage for specific external teams (e.g. service providers, external investment managers or similar)
- ☒ (H) Approach to collaboration on stewardship
- ☒ (I) Escalation strategies
- ☒ (J) Conflicts of interest
- ☐ (K) Details on how the stewardship policy is implemented and which elements are mandatory, including how and when the policy can be overruled
- ☐ (L) How stewardship efforts and results should be communicated across the organisation to feed into investment decision-making and vice versa
- ☐ (M) None of the above elements are captured in our stewardship policy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 12.1	PLUS	ISP 12	N/A	PUBLIC	Stewardship policy	2

Describe any additional details related to your stewardship policy elements or your overall stewardship approach.

As part of our global practice, we manage and implement our stewardship practice in alignment with policies regarding Investment Philosophy, Responsible Investing, Sustainability Risks, Proxy Voting Guidelines, Engagement Practices, corporate values and industry initiatives. To undertake management and governance we utilize a variety of external and internal data tools and analytics.

Stewardship policy implementation

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 13	CORE	ISP 1.1	N/A	PUBLIC	Stewardship policy implementation	2

How is your stewardship policy primarily applied?

- ☒ (A) It requires our organisation to take certain actions
- ☐ (B) It describes default actions that can be overridden (e.g. by investment teams for certain portfolios)
- ☐ (C) It creates permission for taking certain measures that are otherwise exceptional
- ☐ (D) We have not developed a uniform approach to applying our stewardship policy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 14	PLUS	Multiple, see guidance	N/A	PUBLIC	Stewardship policy implementation	2

How does your organisation ensure that its stewardship policy is implemented by external service providers? Please provide examples of the measures your organisation takes when selecting external providers, when designing engagement mandates and when monitoring the activities of external service providers.

Provide examples below:

(A) Measures taken when selecting external providers:	We conduct an annual service review that includes statistics showing the previous year's vote activity, accuracy and timeliness provided by Glass Lewis' research team. Russell Investments has partnered with Sustainalytics as an engagement service provider because their model allows for close oversight and integration with our internal active ownership and investment processes. We re-evaluate the engagement at the end of each contract term, typically three years.
(B) Measures taken when designing engagement mandates for external providers:	When selecting or endorsing engagement activity facilitated by our service partner, Sustainalytics, we maximize the following: a) alignment with our ESG focus areas, b) potential to positively affect investment risk/reward, c) fund exposure, and d) geographic breadth
(C) Measures taken to monitor external providers' alignment with our organisation's stewardship policy:	Glass Lewis is responsible for applying our custom voting guidelines; these are reviewed and updated at least annually by our Guideline Subcommittee, to ensure that our voting activities are aligned with current best practices. Our Engagement Subcommittee communicates regularly with Sustainalytics on the positioning of engagement themes, target company selection, and on progress and outcomes. Investment professionals regularly participate in engagement alongside Sustainalytics.

Stewardship objectives

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 15	CORE	Multiple, see guidance	N/A	PUBLIC	Stewardship objectives	2

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

(1) Listed equity

- (A) Maximise the risk–return profile of individual investments

○
- (B) Maximise overall returns across the portfolio

○

(C) Maximise overall value to beneficiaries/clients



(D) Contribute to shaping specific sustainability outcomes (i.e. deliver impact)



Stewardship prioritisation

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 16	CORE	Multiple, see guidance	N/A	PUBLIC	Stewardship prioritisation	2

What key criteria does your organisation use to prioritise your engagement targets? For asset classes such as real estate, private equity and infrastructure, you may consider this as key criteria to prioritise actions taken on ESG factors for assets, portfolio companies and/or properties in your portfolio. Select up to 3 options per asset class from the list.

(1) Listed equity

(A) The size of our holdings in the entity or the size of the asset, portfolio company and/or property



(B) The materiality of ESG factors on financial and/or operational performance



(C) Specific ESG factors with systemic influence (e.g. climate or human rights)



(D) The ESG rating of the entity



(E) The adequacy of public disclosure on ESG factors/performance



(F) Specific ESG factors based on input from clients



(G) Specific ESG factors based on input from beneficiaries ☐

(H) Other criteria to prioritise engagement targets, please specify: ☐

(I) We do not prioritise our engagement targets ☐

Stewardship methods

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 17	PLUS	Multiple, see guidance	N/A	PUBLIC	Stewardship methods	2

Please rank the methods that are most important for your organisation in achieving its stewardship objectives. Ranking options: 1 = most important, 5 = least important.

(A) Internal resources (e.g. stewardship team, investment team, ESG team or staff) 1

(B) External investment managers, third-party operators and/or external property managers (if applicable) 3

(C) External paid services or initiatives other than investment managers, third-party operators and/or external property managers (paid beyond a membership fee) 2

(D) Informal or unstructured collaborations with peers 5

(E) Formal collaborative engagements (e.g. PRI-coordinated collaborative engagements, Climate Action 100+, the Initiative Climat International (iCI) or similar) 4

Collaborative stewardship

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 18	CORE	Multiple, see guidance	ISP 18.1	PUBLIC	Collaborative stewardship	2

Which of the following best describes your organisation's default position, or the position of the service providers/external managers acting on your behalf, with regards to collaborative stewardship efforts such as collaborative engagements?

- (A) We recognise that stewardship suffers from a collective action problem, and, as a result, we actively prefer collaborative efforts
- (B) We collaborate when our individual stewardship efforts have been unsuccessful or are likely to be unsuccessful, i.e. as an escalation tool
- (C) We collaborate in situations where doing so would minimise resource cost to our organisation
- (D) We do not have a default position but collaborate on a case-by-case basis
- (E) We generally do not join collaborative stewardship efforts

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 18.1	PLUS	ISP 18	N/A	PUBLIC	Collaborative stewardship	2

Describe your position on collaborating for stewardship.

In 2020 Russell Investments began a partnership with Sustainalytics for collaborative engagements. Sustainalytics' thematic engagement programs are designed to extend over a three-year period, allowing Russell Investments and other participants to build relationships with a selected set of issuers, to encourage development in the thematic channel to which they belong. In addition to Sustainalytics, Russell Investments joined Climate Action 100+ in early 2020. ClimateAction 100+ is an investor initiative launched in 2017 to ensure the world's largest corporate greenhouse gas emitters take necessary action on climate change. With ClimateAction 100+ we have directly engaged with a select number of companies on climate transition through the regional entities. Lastly, also in 2020, where our priorities intersect, we have begun collaborating with our subadvisor partners in our direct-to-company engagement activity.

Escalation strategies

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 19	PLUS	Multiple, see guidance	N/A	PUBLIC	Escalation strategies	2

Which of these measures did your organisation, or the service providers/external managers acting on your behalf, use most frequently when escalating initial stewardship approaches that were deemed unsuccessful?

(1) Listed equity

(A) Collaboratively engaging the entity with other investors



(B) Filing/co-filing/submitting a shareholder resolution or proposal



(C) Publicly engaging the entity (e.g. open letter)



(D) Voting against the re-election of one or more board directors



(E) Voting against the chair of the board of directors



(F) Voting against the annual financial report



(G) Divesting or implementing an exit strategy



(H) We did not use any escalation measures during the reporting year. Please explain why below



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 20	CORE	Multiple, see guidance	N/A	PUBLIC	Escalation strategies	2

If initial stewardship approaches were deemed unsuccessful, which of the following measures are excluded from the potential escalation actions of your organisation or those of the service providers/external managers acting on your behalf?

(1) Listed equity

(A) Collaboratively engaging the entity with other investors

☐

(B) Filing/co-filing/submitting a shareholder resolution or proposal

☐

(C) Publicly engaging the entity (e.g. open letter)

☐

(D) Voting against the re-election of one or more board directors

☐

(E) Voting against the chair of the board of directors

☐

(F) Voting against the annual financial report

☐

(G) Divesting or implementing an exit strategy

☒

(H) We do not have any restrictions on the escalation measures we can use

☐

Alignment and effectiveness

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 21	PLUS	Multiple, see guidance	N/A	PUBLIC	Alignment and effectiveness	2

Describe how you coordinate stewardship across your organisation to ensure that stewardship progress and results feed into investment decision-making and vice versa.

Russell Investments' active ownership activities are directed by the Proxy Voting & Engagement Committee (PV&EC), a globally diverse group of our investment professionals from manager research, portfolio management, quantitative and capital markets research, and portfolio implementation roles; however, many other investment professionals also contribute to our active ownership program. Portfolio managers support Russell Investments' fiduciary duties in this area through participation in individually led and collaborative engagements and through oversight of the stewardship actions of our subadvisors communications. When appropriate, PM teams also facilitate the collection of subadvisor input on high profile or impactful proxies on an ad hoc basis and share Russell Investments voting guidelines and voting intentions. Finally, when practical, Russell Investments' portfolio managers conduct direct-to-company, collaborative engagements together with subadvisors, who are a rich source of insight.

Stewardship examples

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 22	PLUS	Multiple, see guidance	N/A	PUBLIC	Stewardship examples	2

Describe stewardship activities that you participated in during the reporting year that led to desired changes in the entity you interacted with. Include what ESG factor(s) you engaged on and whether your stewardship activities were primarily focused on managing ESG risks and opportunities or delivering sustainability outcomes.

	(1) Engagement type	(2) Primary goal of stewardship activity
(A) Example 1	a) Internally (or service provider) led	a) Managing ESG risks/opportunities
(B) Example 2	b) Collaborative	c) Both managing ESG risks and delivering outcomes
(C) Example 3	a) Internally (or service provider) led	a) Managing ESG risks/opportunities

	(3) The ESG factors you focused on in the stewardship activity	(4) Description of stewardship activity and the desired change(s) you achieved
(A) Example 1	Governance and executive compensation	Discussion with a US-based data-management software company on executive compensation following a vote against. Members of the Engagement Subcommittee and a member of our portfolio management team contacted the company to follow up on previously discussed concerns. While the company explained that a one-off circumstance created extenuating circumstances, Russell Investments reiterated that until they had demonstrably done more to align pay with their performance, we would continue to vote against. The company promised that pay and performance would be better aligned in the future. We will continue to monitor the company for progress.
(B) Example 2	Climate change risks	Members of the portfolio management team participated in a joint engagement with a packaged-food company based in Japan led by our manager subadvisor. Our portfolio management team joined these discussions to support the subadvisor's messaging and make our interest in the topic known to the company. This engagement was a follow-up to a 2019 collaborative engagement conversation on climate change risks, and we found that as a result of the prior year's engagement, the company had committed to the TCFD reporting framework in June 2020.

(C) Example 3

Sustainability disclosures and diversity

The Engagement Subcommittee and lead portfolio manager initiated a multi-pronged discussion with a US packaging company concerning sustainability disclosures and diversity. When we noted that the high number of long-standing board members could be considered entrenched, the company expressed an intention to add fresh perspective via upcoming openings. We assessed their sustainability reporting as strong overall but noted that some important water usage metrics were lacking, and we encouraged further disclosure of this data over time. We intend to monitor further developments.

Engaging policymakers

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 23	CORE	N/A	Multiple, see guidance	PUBLIC	Engaging policymakers	2

How does your organisation, or the external investment managers or service providers acting on your behalf, engage with policymakers for a more sustainable financial system?

- ☒ (A) We engage with policymakers directly
- ☒ (B) We provide financial support, are members of and/or are in another way affiliated with third-party organisations, including trade associations and non-profit organisations, that engage with policymakers
- ☐ (C) We do not engage with policymakers directly or indirectly

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 23.1	CORE	ISP 23	N/A	PUBLIC	Engaging policymakers	2

What methods do you, or the external investment managers or service providers acting on your behalf, use to engage with policymakers for a more sustainable financial system?

- ☐ (A) We participate in "sign-on" letters on ESG policy topics. Describe:
- ☒ **(B) We respond to policy consultations on ESG policy topics. Describe:**
 We engaged with ICI, SIFMA and CCIT as the US Department of Labor updated ERISA guidance on ESG and Proxy Voting guidance
- ☐ (C) We provide technical input on ESG policy change. Describe:
- ☐ (D) We proactively engage financial regulators on financial regulatory topics regarding ESG integration, stewardship, disclosure or similar. Describe:
- ☐ (E) We proactively engage regulators and policymakers on other policy topics. Describe:
- ☐ (F) Other methods used to engage with policymakers. Describe:

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 23.2	CORE	ISP 23	N/A	PUBLIC	Engaging policymakers	2

Do you have governance processes in place (e.g. board accountability and oversight, regular monitoring and review of relationships) that ensure your policy activities, including those through third parties, are aligned with your position on sustainable finance and your commitment to the 6 Principles of the PRI?

- ☐ (A) Yes, we have governance processes in place to ensure that our policy activities are aligned with our position on sustainable finance and our commitment to the 6 Principles of the PRI. Describe your governance processes:
- ☒ **(B) No, we do not have these governance processes in place. Please explain why not:**
 Russell Investments engages in policies that are aligned with our position on sustainable finance and our commitment to the 6 Principles of the PRI. The oversight of these activities is currently informal and typically involves discussions and signoff by executive leadership, however, we do not formally prescribe how we will assure that alignment. We regularly update and review our policies and are considering specific policies of this type.

Engaging policymakers – Policies

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 24	CORE	ISP 23	ISP 24.1	PUBLIC	Engaging policymakers – Policies	2

Do you have policies in place that ensure that your political influence as an organisation is aligned with your position on sustainable finance and your commitment to the 6 Principles of the PRI?

☐ (A) Yes, we have a policy(ies) in place. Describe your policy(ies):

☒ (B) No, we do not a policy(ies) in place. Please explain why not:

Russell Investments influences policy to be aligned with our position on sustainable finance and our commitment to the 6 Principles of the PRI. The oversight of these activities is currently informal and typically involves discussions and signoff by executive leadership, however, we do not formally prescribe how we will assure that alignment. We regularly update and review our policies and are considering specific policies of this type.

Engaging policymakers – Transparency

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 25	CORE	ISP 23	N/A	PUBLIC	Engaging policymakers – Transparency	2

During the reporting year, did your organisation publicly disclose your policy engagement activities or those conducted on your behalf by external investment managers/service providers?

☐ (A) We publicly disclosed details of our policy engagement activities. Add link(s):

☐ (B) We publicly disclosed a list of our third-party memberships in or support for trade associations, think-tanks or similar that conduct policy engagement activities with our support or endorsement. Add link(s):

☒ (C) No, we did not publicly disclose our policy engagements activities during the reporting year. Explain why:

We regularly update and review our practices and are considering this type of disclosure.

☐ (D) Not applicable, we did not conduct policy engagement activities

Climate change

Public support

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 26	CORE	N/A	N/A	PUBLIC	Public support	General

Does your organisation publicly support the Paris Agreement?

● (A) Yes, we publicly support the Paris Agreement Add link(s) to webpage or other public document/text expressing support for the Paris Agreement:

■ <https://russellinvestments.com/uk/about-us/newsroom/2021/russell-investments-announces-net-zero-carbon-emissions-goal>

○ (B) No, we currently do not publicly support the Paris Agreement

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 27	CORE	N/A	N/A	PUBLIC	Public support	General

Does your organisation publicly support the Task Force on Climate-Related Financial Disclosures (TCFD)?

● (A) Yes, we publicly support the TCFD Add link(s) to webpage or other public document/text expressing support for the TCFD:

■ <https://russellinvestments.com/uk/about-us/responsible-investing>

○ (B) No, we currently do not publicly support the TCFD

Governance

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 28	CORE	N/A	N/A	PUBLIC	Governance	General

How does the board or the equivalent function exercise oversight over climate-related risks and opportunities?

☒ (A) By establishing internal processes through which the board or the equivalent function are informed about climate-related risks and opportunities. Specify:

The Russell Investments Global Responsible Investing Steering Group reports bi-annually to board members on all responsible investing matters.

☐ (B) By articulating internal/external roles and responsibilities related to climate. Specify:

☐ (C) By engaging with beneficiaries to understand how their preferences are evolving with regard to climate change. Specify:

☒ (D) By incorporating climate change into investment beliefs and policies. Specify:

Russell Investments' policy is to research, measure, report and consider climate change risk and opportunities as integral parts of our investing practice, our active ownership, and our business operations. Our measures, reported metrics, and consideration of climate risk and opportunities are integrated into our sub-advisor research and selection, portfolio management, advice, proxy voting and shareholder engagement, and day-to-day business.

☐ (E) By monitoring progress on climate-related metrics and targets. Specify:

☒ (F) By defining the link between fiduciary duty and climate risks and opportunities. Specify:

Russell Investments' policy is to integrate sustainability risks in our investment solutions by identifying, evaluating and managing relevant risks in our investment manager review process, and portfolio management and through implementing proprietary solutions. We believe sustainability risks are most relevant to investment outcomes when they exhibit financial materiality, and, like all investment risks, are incorporated by balancing expected risk with expected reward.

In managing investment solutions, we consider financially-material sustainability risks in the context of expected rewards using a blend of inputs from sources including, but not limited to, investment managers, third-party data sources and Russell Investments propriety analysis. Furthermore, we incorporate bespoke sustainability risks based on clients' requirements for customized mandates. As well, we seek to collaborate with our advisory clients to consider, monitor and manage sustainability risk priorities in their portfolios.

☐ (G) Other measures to exercise oversight, please specify:

☐ (H) The board or the equivalent function does not exercise oversight over climate-related risks and opportunities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 29	CORE	N/A	N/A	PUBLIC	Governance	General

What is the role of management in assessing and managing climate-related risks and opportunities?

☒ (A) Management is responsible for identifying climate-related risks/opportunities and reporting them back to the board or the equivalent function. Specify:

The Russell Investments Global Responsible Investing Steering Group includes the CIO and other Executive Committee members. The Steering Group receives regular updates on our climate change research and reporting.

☒ (B) Management implements the agreed-upon risk management measures. Specify:

Russell Investments' policy is to integrate sustainability risks in our investment solutions by identifying, evaluating and managing relevant risks in our investment manager review process, and portfolio management and through implementing proprietary solutions. We believe sustainability risks are most relevant to investment outcomes when they exhibit financial materiality, and, like all investment risks, are incorporated by balancing expected risk with expected reward.

In managing investment solutions, we consider financially-material sustainability risks in the context of expected rewards using a blend of inputs from sources including, but not limited to, investment managers, third-party data sources and Russell Investments propriety analysis. Furthermore, we incorporate bespoke sustainability risks based on clients' requirements for customized mandates. As well, we seek to collaborate with our advisory clients to consider, monitor and manage sustainability risk priorities in their portfolios.

☒ (C) Management monitors and reports on climate-related risks and opportunities. Specify:

The Russell Investments Global Responsible Investing Steering Group includes the CIO and other EC members. The Steering Group receives regular updates on our climate change research and reporting.

☒ (D) Management ensures adequate resources, including staff, training and budget, are available to assess, implement and monitor climate-related risks/opportunities and measures. Specify:

Russell Investments has materially increased resourcing for climate-related risks/opportunities and measures through approval of current staff research initiatives, staffing increases and support for data procurement.

☐ (E) Other roles management takes on to assess and manage climate-related risks/opportunities, please specify:

☐ (F) Our management does not have responsibility for assessing and managing climate-related risks and opportunities

Strategy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 30	CORE	N/A	Multiple, see guidance	PUBLIC	Strategy	General

Which climate-related risks and opportunities has your organisation identified within its investment time horizon(s)?

☐ (A) Specific financial risks in different asset classes. Specify:

☒ (B) Specific sectors and/or assets that are at risk of being stranded. Specify:

Carbon reserves, Green energy production.

☒ (C) Assets with exposure to direct physical climate risk. Specify:

Carbon footprint, temperature alignment.

☒ (D) Assets with exposure to indirect physical climate risk. Specify:

Carbon footprint, temperature alignment.

☒ (E) Specific sectors and/or assets that are likely to benefit under a range of climate scenarios. Specify:

Green energy ratio, ESG risk ratings.

☒ (F) Specific sectors and/or assets that contribute significantly to achieving our climate goals. Specify:

Green energy ratio, ESG risk ratings.

☒ (G) Other climate-related risks and opportunities identified. Specify:

ESG qualitative assessment (ESG disaggregated rank).

☐ (H) We have not identified specific climate-related risks and opportunities within our organisation's investment time horizon

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 30.1	CORE	ISP 30	N/A	PUBLIC	Strategy	General

For each of the identified climate-related risks and opportunities, indicate within which investment time-horizon they were identified.

	(1) 3–5 months	(2) 6 months to 2 years	(3) 2–4 years	(4) 5–10 years
(B) Specific sectors and/or assets that are at risk of being stranded [as specified]	☐	☐	☒	☒
(C) Assets with exposure to direct physical climate risk [as specified]	☐	☐	☐	☒
(D) Assets with exposure to indirect physical climate risk [as specified]	☐	☐	☐	☒
(E) Specific sectors and/or assets that are likely to benefit under a range of climate scenarios [as specified]	☒	☒	☐	☐
(F) Specific sectors and/or assets that contribute significantly to achieving our climate goals [as specified]	☒	☒	☐	☐
(G) Other climate-related risks and opportunities identified [as specified]	☒	☒	☐	☐
	(5) 11–20 years	(6) 21–30 years	(7) >30 years	
(B) Specific sectors and/or assets that are at risk of being stranded [as specified]	☒	☒	☐	

(C) Assets with exposure to direct physical climate risk [as specified]	☒	☒	☐
(D) Assets with exposure to indirect physical climate risk [as specified]	☒	☒	☐
(E) Specific sectors and/or assets that are likely to benefit under a range of climate scenarios [as specified]	☐	☐	☐
(F) Specific sectors and/or assets that contribute significantly to achieving our climate goals [as specified]	☐	☐	☐
(G) Other climate-related risks and opportunities identified [as specified]	☐	☐	☐

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 31	CORE	N/A	N/A	PUBLIC	Strategy	General

Which climate-related risks and opportunities has your organisation identified beyond its investment time horizon(s)?

☒ **(A) Specific financial risks in different asset classes. Specify:**

We recognize that over the long term, climate-related risks and opportunities may manifest differently across different asset classes and sectors. For example, real estate, infrastructure, energy, or utility assets may be more exposed to climate-related risks and opportunities than other asset classes and sectors.

☒ **(B) Specific sectors and/or assets that are at risk of being stranded. Specify:**

When specifically incorporating climate-related outcomes into our low carbon strategies, we consider a security's exposure to fossil fuel reserves as a proxy for assets at risk of being stranded.

☐ (C) Assets with exposure to direct physical climate risk. Specify:

☐ (D) Assets with exposure to indirect physical climate risk. Specify:

☐ (E) Specific sectors and/or assets that are likely to benefit under a range of climate scenarios. Specify:

☐ (F) Specific sectors and/or assets that contribute significantly to achieving our climate goals. Specify:

☒ **(G) Other climate-related risks and opportunities identified, please specify:**

As part of our commitment to the Net Zero Asset Manager Initiative, we will evaluate and assess climate-related risks and opportunities across our solutions globally.

☐ (H) We have not identified specific climate-related risks and opportunities beyond our organisation's investment time horizon

Strategy: Scenario analysis

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 33	CORE	N/A	ISP 33.1	PUBLIC	Strategy: Scenario analysis	General

Does your organisation use scenario analysis to assess climate-related investment risks and opportunities? Select the range of scenarios used.

- ☒ (A) An orderly transition to a 2°C or lower scenario
- ☒ (B) An abrupt transition consistent with the Inevitable Policy Response
- ☒ (C) A failure to transition, based on a 4°C or higher scenario
- ☒ (D) Other climate scenario, specify:

☐ We are currently using publicly available information to assess transition scenarios and temperature alignment for our funds.

- ☐ (E) We do not use scenario analysis to assess climate-related investment risks and opportunities

Sustainability outcomes

Set policies on sustainability outcomes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 40	CORE	ISP 1.1	N/A	PUBLIC	Set policies on sustainability outcomes	1, 2

Where is your approach to sustainability outcomes set out? Your policy/guideline may be a standalone document or part of a wider responsible investment policy.

- ☐ (A) Our approach to sustainability outcomes is set out in our responsible investment policy
- ☐ (B) Our approach to sustainability outcomes is set out in our exclusion policy
- ☒ (C) Our approach to sustainability outcomes is set out in our stewardship policy
- ☒ (D) Our approach to sustainability outcomes is set out in asset class-specific investment guidelines
- ☐ (E) Our approach to sustainability outcomes is set out in separate guidelines on specific outcomes (e.g. the SDGs, climate or human rights)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 41	CORE	ISP 1.1	N/A	PUBLIC	Set policies on sustainability outcomes	1, 2

Which global or regionally recognised frameworks do your policies and guidelines on sustainability outcomes refer to?

- ☐ (A) The SDG goals and targets
☐ (B) The Paris Agreement
☐ (C) The UN Guiding Principles on Business and Human Rights
☐ (D) The OECD Guidelines for Multinational Enterprises, including guidance on Responsible Business Conduct for Institutional Investors
☒ (E) Other frameworks, please specify:
 UNPRI Engagement outcomes
☒ (F) Other frameworks, please specify:
 For bespoke mandates, we have specific guidelines that are guided by, e.g., Febelfin, RIAA, or by client-set criteria. In the case of impact funds, we have worked closely with the clients to identify targeted outcomes.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 42	PLUS	ISP 1.1	N/A	PUBLIC	Set policies on sustainability outcomes	1, 2

What are the main reasons that your organisation has established policies or guidelines on sustainability outcomes? Select a maximum of three options.

- ☐ (A) Because we understand which potential financial risks and opportunities are likely to exist in (and during the transition to) an SDG-aligned world
☒ (B) Because we see it as a way to identify opportunities, such as through changes to business models, across supply chains and through new and expanded products and services
☐ (C) Because we want to prepare for and respond to legal and regulatory developments, including those that may lead to stranded assets
☐ (D) Because we want to protect our reputation and licence-to-operate (i.e. the trust of beneficiaries, clients and other stakeholders), particularly in the event of negative sustainability outcomes from investments
☒ (E) Because we want to meet institutional commitments on global goals (including those based on client or beneficiaries' preferences), and communicate on progress towards meeting those objectives
☒ (F) Because we consider materiality over longer time horizons to include transition risks, tail risks, financial system risks and similar
☐ (G) Because we want to minimise negative sustainability outcomes and increase positive sustainability outcomes of investments

Identify sustainability outcomes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 43	CORE	N/A	Multiple, see guidance	PUBLIC	Identify sustainability outcomes	1

Has your organisation identified the intended and unintended sustainability outcomes from any of its activities?

- ☐ (A) No, we have not identified the sustainability outcomes from our activities
- ☒ (B) Yes, we have identified one or more sustainability outcomes from some or all of our activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 44	CORE	ISP 43	ISP 44.1	PUBLIC	Identify sustainability outcomes	1

What frameworks/tools did your organisation use to identify the sustainability outcomes from its activities? Indicate the tools or frameworks you have used to identify and map some or all of your sustainability outcomes.

- ☐ (A) The UN Sustainable Development Goals (SDGs) and targets
- ☐ (B) The Paris Agreement
- ☐ (C) The UN Guiding Principles on Business and Human Rights (UNGPs)
- ☐ (D) The OECD Guidelines for Multinational Enterprises, including guidance on Responsible Business Conduct for Institutional Investors
- ☐ (E) The EU Taxonomy
- ☐ (F) Other taxonomies (e.g. similar to the EU Taxonomy), please specify:
- ☒ (G) Other framework/tool, please specify:

PRI outcome framework for shareholder engagement. We have adopted the following categories: Company changed practice, Company committed to change, Disclosure/report published, Fail/No Outcome, Increased understanding/Information, Ongoing, Voting. We have not adopted "investment" or "divestment."

- ☐ (H) Other framework/tool, please specify:
- ☐ (I) Other framework/tool, please specify:

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 44.1	CORE	ISP 44	N/A	PUBLIC	Identify sustainability outcomes	1

At what level(s) did your organisation identify the sustainability outcomes from its activities?

- ☐ (A) At the asset level
- ☐ (B) At the economic activity level
- ☒ (C) **At the company level**
- ☐ (D) At the sector level
- ☐ (E) At the country/region level
- ☐ (F) At the global level
- ☐ (G) Other level(s), please specify:
- ☐ (H) We do not track at what level(s) our sustainability outcomes were identified

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 45	CORE	ISP 43	SO 1	PUBLIC	Identify sustainability outcomes	1

How has your organisation determined your most important sustainability outcome objectives?

- ☒ (A) **Identifying sustainability outcomes that are closely linked to our core investment activities**
- ☒ (B) **Consulting with key clients and/or beneficiaries to align with their priorities**
- ☐ (C) Assessing the potential severity (e.g. probability and amplitude) of specific negative outcomes over different timeframes
- ☒ (D) **Focusing on the potential for systemic impacts (e.g. due to high level of interconnectedness with other global challenges)**
- ☐ (E) Evaluating the potential for certain outcome objectives to act as a catalyst/enabler to achieve a broad range of goals (e.g. gender or education)
- ☐ (F) Analysing the input from different stakeholders (e.g. affected communities, civil society or similar)
- ☒ (G) **Understanding the geographical relevance of specific sustainability outcome objectives**
- ☐ (H) Other method, please specify:
- ☐ (I) We have not yet determined our most important sustainability outcome objectives

Transparency & Confidence-Building Measures

Information disclosed – ESG assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 46	CORE	OO 16	N/A	PUBLIC	Information disclosed – ESG assets	6

For the majority of your ESG/sustainability marketed funds or products, and/or your ESG/RI certified or labelled assets, what information about your ESG approach do you (or the external investment managers/service providers acting on your behalf) include in material shared with clients, beneficiaries and/or the public? The material may be marketing material, information targeted towards existing or prospective clients or information for beneficiaries.

- ☒ (A) A commitment to responsible investment (e.g. that we are a PRI signatory)
- ☒ (B) Industry-specific and asset class-specific standards that we align with (e.g. TCFD, or GRESB for property and infrastructure)
- ☒ (C) Our responsible investment policy (at minimum a summary of our high-level approach)
- ☒ (D) A description of our investment process and how ESG is considered
- ☒ (E) ESG objectives of individual funds
- ☐ (F) Information about the ESG benchmark(s) that we use to measure fund performance
- ☒ (G) Our stewardship approach
- ☐ (H) A description of the ESG criteria applied (e.g. sectors, products, activities, ratings and similar)
- ☒ (I) The thresholds for the ESG criteria applied in our investment decisions or universe construction
- ☒ (J) A list of our main investments and holdings
- ☒ (K) ESG case study/example from existing fund(s)
- ☐ (L) We do not include our approach to ESG in material shared with clients/beneficiaries/the public for the majority of our ESG/sustainability marketed funds or products, and/or our ESG/RI certified or labelled assets

Client reporting – ESG assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 48	CORE	Multiple, see guidance	N/A	PUBLIC	Client reporting – ESG assets	6

What ESG information is included in your client reporting for the majority of your ESG/sustainability marketed funds or products, and/or your ESG/RI certified or labelled assets?

- ☒ (A) Qualitative analysis, descriptive examples or case studies
- ☒ (B) Quantitative analysis or key performance indicators (KPIs) related to ESG performance
- ☒ (C) Progress on our sustainability outcome objectives
- ☒ (D) Stewardship results
- ☐ (E) Information on ESG incidents, where applicable
- ☐ (F) Analysis of ESG contribution to portfolio financial performance
- ☐ (G) We do not include ESG information in client reporting for the majority of our ESG/sustainability marketed funds or products, and/or our ESG/RI certified or labelled assets

Information disclosed – All assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 49	CORE	N/A	N/A	PUBLIC	Information disclosed – All assets	6

For the majority of your total assets under management, what information about your ESG approach do you (or the external managers/service providers acting on your behalf) include in material shared with clients, beneficiaries and/or the public? The material may be marketing material, information targeted towards existing or prospective clients or information for beneficiaries.

- ☒ (A) A commitment to responsible investment (e.g. that we are a PRI signatory)
- ☒ (B) Industry-specific and asset class-specific standards that we align with (e.g. TCFD, or GRESB for property and infrastructure)
- ☒ (C) Our responsible investment policy (at minimum a summary of our high-level approach)
- ☒ (D) A description of our investment process and how ESG is considered
- ☐ (E) ESG objectives of individual funds
- ☐ (F) Information about the ESG benchmark(s) that we use to measure fund performance
- ☒ (G) Our stewardship approach
- ☐ (H) A description of the ESG criteria applied (e.g. sectors, products, activities, ratings and similar)
- ☐ (I) The thresholds for the ESG criteria applied in our investment decisions or universe construction
- ☒ (J) A list of our main investments and holdings
- ☐ (K) ESG case study/example from existing fund(s)

☐ (L) We do not include our approach to ESG in material shared with clients/beneficiaries/the public for the majority of our assets under management

Client reporting – All assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 50	CORE	Multiple, see guidance	N/A	PUBLIC	Client reporting – All assets	6

What ESG information is included in your client reporting for the majority of your assets under management?

- ☒ (A) Qualitative ESG analysis, descriptive examples or case studies
- ☒ (B) Quantitative analysis or key performance indicators (KPIs) related to ESG performance
- ☐ (C) Progress on our sustainability outcome objectives
- ☒ (D) Stewardship results
- ☐ (E) Information on ESG incidents where applicable
- ☐ (F) Analysis of ESG contribution to portfolio financial performance
- ☐ (G) We do not include ESG information in client reporting for the majority of our assets under management

Frequency of client reporting – All assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 51	CORE	Multiple, see guidance	N/A	PUBLIC	Frequency of client reporting – All assets	6

For the majority of each asset class, how frequently do you report ESG-related information to your clients?

(A) Listed equity

(1) Quarterly

Confidence-building measures

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 52	CORE	OO 16.1	Multiple, see guidance	PUBLIC	Confidence-building measures	6

What verification has your organisation had regarding the information you have provided in your PRI Transparency Report this year?

- ☒ (A) We received third-party independent assurance of selected processes and/or data related to our responsible investment processes, which resulted in a formal assurance conclusion
- ☐ (B) We conducted a third-party readiness review and are making changes to our internal controls/governance or processes to be able to conduct an external assurance next year
- ☒ (C) The internal audit function team performed an independent audit of selected processes/and or data related to our responsible investment processes reported in this PRI report
- ☒ (D) Our board, CEO, other C-level equivalent and/or investment committee has signed off on our PRI report
- ☒ (E) Some or all of our funds have been audited as part of the certification process against a sustainable investment/RI label
- ☐ (F) We conducted an external ESG audit of our ESG/sustainability marketed funds or products (excluding ESG/RI certified or labelled assets)
- ☐ (G) We conducted an external ESG audit of our holdings to check that our funds comply with our RI policy (e.g. exclusion list or investee companies in portfolio above certain ESG rating)
- ☐ (H) We conducted an external ESG audit of our holdings as part of risk management, engagement identification or investment decision-making
- ☒ (I) Responses related to our RI practices documented in this report have been internally reviewed before submission to the PRI
- ☐ (J) None of the above

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 53	CORE	ISP 52, OO 14	N/A	PUBLIC	Confidence-building measures	6

Which responsible investment processes and/or data did your organisation have third-party external assurance on?

- | | |
|---|--|
| (A) Investment and stewardship policy | (3) Processes and related data assured |
| (B) Manager selection, appointment and monitoring | (1) Processes assured |
| (C) Listed equity | (3) Processes and related data assured |

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 54	CORE	ISP 52	ISP 54.1	PUBLIC	Confidence-building measures	6

What standard did your third-party external assurance provider use?

- ☐ (A) PAS 7341:2020
- ☐ (B) ISAE 3000 and national standards based on this
- ☐ (C) Dutch Standard 3810N (Assurance engagements regarding sustainability reports)
- ☐ (D) RevR6 (Assurance of Sustainability)
- ☐ (E) IDW AsS 821 (Assurance Standard for the Audit or Review of Reports on Sustainability Issues)
- ☐ (F) Accountability AA1000 Assurance Standard (AA1000AS)
- ☐ (G) IFC performance standards
- ☐ (H) SSAE 18 and SOC 1
- ☒ (I) Other national auditing/assurance standard with guidance on sustainability, please specify:
RIAA
- ☐ (J) Invest Europe Handbook of Professional Standards
- ☐ (K) ISAE 3402
- ☐ (L) AAF 01/06
- ☐ (M) AAF 01/06 Stewardship Supplement
- ☐ (N) ISO 26000 Social Responsibility
- ☐ (O) ASAE 3410 Assurance Engagements on Greenhouse Gas Statements
- ☐ (P) PCAF
- ☐ (Q) NGRS audit framework (National Greenhouse and Energy Reporting)
- ☐ (R) Auditor's proprietary assurance framework for assuring RI-related information
- ☐ (S) Other greenhouse gas emissions assurance standard, please specify:
- ☐ (T) None of the above

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 54.1	PLUS	ISP 54	N/A	PUBLIC	Confidence-building measures	6

Attach your third-party external assurance provider's report that contains the assurance conclusion.

File uploaded: https://priassociation.eu.qualtrics.com/ControlPanel/File.php?F=F_Cd9JCiLPO45pwwF

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 55	PLUS	ISP 52	N/A	PUBLIC	Confidence-building measures	6

Provide details of the third-party external assurance. Include details such as the level of assurance attained, who conducted it, limitations, the expertise of the assurer in the subject matter and/or usage of multiple standards.

 <https://www.responsiblereturns.com.au/investment-managers/russell-investments/profile>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 56	CORE	OO 14, ISP 52	N/A	PUBLIC	Confidence-building measures	6

What responsible investment processes and/or data were audited by internal auditors/outsourced internal auditors?

(A) Investment and stewardship policy	(3) Processes and related data assured
(B) Manager selection, appointment and monitoring	(1) Processes assured
(C) Listed equity	(3) Processes and related data assured

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 57	PLUS	ISP 52	N/A	PUBLIC	Confidence-building measures	6

Provide details about the internal audit process regarding the information provided in your PRI Transparency Report.

The purpose of the Russell Investments Group Internal Audit function is to provide independent, objective assurance and consulting services designed to improve the organisation's controls and operations. Internal Audit accomplishes this by providing risk-based and objective assurance, advice and insight to enhance and protect organisational value. Internal Audit helps the organisation accomplish its objectives by bringing a systematic, disciplined approach to test, evaluate, and improve the effectiveness of governance, risk management and control processes.

The Russell Investments Group Internal Audit function utilises a risk-based approach in developing the annual audit plan. The audit universe of key processes is assessed to focus the audit plan on the areas of highest risk. Any issues identified by Internal Audit require management action plans (MAPs) and are tracked to resolution by Internal Audit. The status of open issues is regularly reported to relevant boards and audit committees. Internal Audit validates resolution to close identified issues.

Internal Audit conducts structured reviews of key processes and risks, including detailed testing of mitigating controls across the organisation. These audits are designed to assess if systems and procedures are effective, efficient and function as designed, thereby helping ensure:

- risks are appropriately identified and managed
- quality and continuous improvement are fostered in the organisation's control process
- significant financial, managerial, and operating information is prepared accurately and reliably
- resources are adequately protected

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 58	CORE	ISP 52	N/A	PUBLIC	Confidence-building measures	6

Who has reviewed/verified the entirety of or selected data from your PRI report?

(A) Board and/or trustees (4) report not reviewed

(B) Chief-level staff (e.g. Chief Executive Officer (CEO), Chief Investment Officer (CIO) or Chief Operating Officer (COO)) (1) the entire report

(C) Investment committee (1) the entire report

(D) Other chief-level staff, please specify:

Head of EMEA business

(1) the entire report

(E) Head of department, please specify:

Head of Responsible Investing, Head of Research, Head of Portfolio Management

(1) the entire report

(F) Compliance/risk management team

(4) report not reviewed

(G) Legal team

(1) the entire report

(H) RI/ ESG team

(1) the entire report

(I) Investment teams

(3) parts of the report

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 59	CORE	ISP 52	N/A	PUBLIC	Confidence-building measures	6

Which of the following 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) EU Ecolabel
- ☐ (H) EU Green Bond Standard
- ☐ (I) Febelfin label (Belgium)
- ☐ (J) FNG-Siegel Ecolabel (Germany, Austria and Switzerland)
- ☐ (K) Greenfin label (France)
- ☐ (L) ICMA Green Bond Principles
- ☐ (M) Le label ISR (French government SRI label)
- ☐ (N) Luxflag Climate Finance
- ☐ (O) Luxflag Environment
- ☐ (P) Luxflag ESG
- ☐ (Q) Luxflag Green Bond
- ☐ (R) Luxflag Microfinance
- ☐ (S) National stewardship code (e.g. UK or Japan), please specify:
- ☐ (T) Nordic Swan Ecolabel
- ☐ (U) Other SRI label based on EUROSIF SRI Transparency Code (e.g. Novethic), please specify:
- ☐ (V) People's Bank of China green bond guidelines
- ☒ (W) **RIAA (Australia)**
- ☐ (X) Towards Sustainability label (Belgium)
- ☐ (Y) Other, please specify:

Manager Selection, Appointment and Monitoring (SAM)

Selection

Responsible investment policy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 2	CORE	OO 11	SAM 2.1	PUBLIC	Responsible investment policy	1, 4

During the reporting year, did your organisation include compliance with your responsible investment policy as a pre-requisite when selecting external managers? (If you did not select any external managers during the reporting year, refer to the last reporting year in which you did select external managers.)

	(1) Yes, only when selecting external managers of ESG/sustainability funds	(2) Yes, when selecting external managers of ESG/sustainability funds and mainstream funds (This option also applies to signatories who may not hold ESG/sustainability funds)	(3) We did not include compliance with our responsible investment policy as a pre-requisite when selecting external managers
(A) Listed equity (active)	☒	☐	☐
(C) Fixed income (active)	☒	☐	☐
(E) Private equity	☒	☐	☐
(F) Real estate	☒	☐	☐
(G) Infrastructure	☒	☐	☐
(H) Hedge funds	☐	☐	☒

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 2.1	CORE	SAM 2	N/A	PUBLIC	Responsible investment policy	1,4

In what proportion of cases did your organisation include compliance with your responsible investment policy as a pre-requisite when selecting external managers?

(1) Listed equity (active)

(A) When selecting external managers of ESG/sustainability funds	(2) in the majority of cases
--	------------------------------

(3) Fixed income (active)

(A) When selecting external managers of ESG/sustainability funds	(1) in all cases
--	------------------

(5) Private equity

(A) When selecting external managers of ESG/sustainability funds	(1) in all cases
--	------------------

(6) Real estate

(A) When selecting external managers of ESG/sustainability funds	(1) in all cases
--	------------------

(7) Infrastructure

(A) When selecting external managers of ESG/sustainability funds	(1) in all cases
--	------------------

Research and screening

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 3	CORE	OO 11	N/A	PUBLIC	Research and screening	1

When selecting external managers, which aspects of their organisation do you, or the investment consultant acting on your behalf, assess against responsible investment criteria? (Per asset class, indicate the proportion of your AUM to which each of these selection practices applies, regardless of when you selected your different external managers.)

	(1) Listed equity (active)	(3) Fixed income (active)
(A) Firm culture	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(B) Investment approach, objectives and philosophy	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(C) Investment policy or guidelines	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(D) Governance structure and management oversight, including diversity	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(E) Investment strategy and fund structure	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(F) Investment team competencies	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(G) Other, please specify:	NA (1) for all of our externally managed AUM	NA (1) for all of our externally managed AUM
	(5) Private equity	(6) Real estate
(A) Firm culture	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM

(B) Investment approach, objectives and philosophy	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(C) Investment policy or guidelines	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(D) Governance structure and management oversight, including diversity	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(E) Investment strategy and fund structure	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(F) Investment team competencies	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(G) Other, please specify:	■ NA (1) for all of our externally managed AUM	■ NA (1) for all of our externally managed AUM

(7) Infrastructure

(8) Hedge Funds

(A) Firm culture	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(B) Investment approach, objectives and philosophy	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(C) Investment policy or guidelines	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(D) Governance structure and management oversight, including diversity	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(E) Investment strategy and fund structure	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(F) Investment team competencies	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM

(G) Other, please specify:

NA

(1) for all of our externally managed AUM

NA

(1) for all of our externally managed AUM

Investment practices

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 4	CORE	OO 11	N/A	PUBLIC	Investment practices	1

Which responsible investment practices does your organisation, or the investment consultants acting on your behalf, require as part of your external manager selection criteria? (Per asset class, indicate the proportion of your AUM to which each of these selection practices applies, regardless of when you selected your different external managers.) As part of the selection criteria, we require that external managers:

(1) Listed equity (active)

(3) Fixed income (active)

(A) Incorporate material ESG factors in all of their investment analyses and decisions

(2) for the majority of our externally managed AUM

(2) for the majority of our externally managed AUM

(B) Incorporate their own responsible investment policy into their asset allocation decisions

(2) for the majority of our externally managed AUM

(2) for the majority of our externally managed AUM

(C) Have adequate resources and processes to analyse ESG factors

(2) for the majority of our externally managed AUM

(2) for the majority of our externally managed AUM

(D) Incorporate material ESG factors throughout their portfolio construction

(2) for the majority of our externally managed AUM

(2) for the majority of our externally managed AUM

(E) Engage with underlying portfolio assets to address ESG risks and opportunities	(2) for the majority of our externally managed AUM	(2) for the majority of our externally managed AUM
(F) Comply with their own exclusions policy	(1) for all of our externally managed AUM	(2) for the majority of our externally managed AUM
(G) Embed ESG considerations in contractual documentation	(3) for a minority of our externally managed AUM	(2) for the majority of our externally managed AUM
(H) Implement adequate disclosure and accountability mechanisms	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(I) Are willing to work in partnership with our organisation to develop their responsible investment approach	(3) for a minority of our externally managed AUM	(2) for the majority of our externally managed AUM
(J) Track the positive and negative sustainability outcomes of their activities	(3) for a minority of our externally managed AUM	(3) for a minority of our externally managed AUM
(K) Other, please specify:	■ NA (1) for all of our externally managed AUM	■ NA (1) for all of our externally managed AUM
	(5) Private equity	(6) Real estate
(A) Incorporate material ESG factors in all of their investment analyses and decisions	(3) for a minority of our externally managed AUM	(2) for the majority of our externally managed AUM

(B) Incorporate their own responsible investment policy into their asset allocation decisions	(3) for a minority of our externally managed AUM	(2) for the majority of our externally managed AUM
(C) Have adequate resources and processes to analyse ESG factors	(3) for a minority of our externally managed AUM	(2) for the majority of our externally managed AUM
(D) Incorporate material ESG factors throughout their portfolio construction	(3) for a minority of our externally managed AUM	(2) for the majority of our externally managed AUM
(E) Engage with underlying portfolio assets to address ESG risks and opportunities	(3) for a minority of our externally managed AUM	(2) for the majority of our externally managed AUM
(F) Comply with their own exclusions policy	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(G) Embed ESG considerations in contractual documentation	(3) for a minority of our externally managed AUM	(2) for the majority of our externally managed AUM
(H) Implement adequate disclosure and accountability mechanisms	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(I) Are willing to work in partnership with our organisation to develop their responsible investment approach	(3) for a minority of our externally managed AUM	(3) for a minority of our externally managed AUM
(J) Track the positive and negative sustainability outcomes of their activities	(3) for a minority of our externally managed AUM	(2) for the majority of our externally managed AUM

(K) Other, please specify:	NA (1) for all of our externally managed AUM	NA (1) for all of our externally managed AUM
	(7) Infrastructure	(8) Hedge funds
(A) Incorporate material ESG factors in all of their investment analyses and decisions	(2) for the majority of our externally managed AUM	(1) for all of our externally managed AUM
(B) Incorporate their own responsible investment policy into their asset allocation decisions	(2) for the majority of our externally managed AUM	(3) for a minority of our externally managed AUM
(C) Have adequate resources and processes to analyse ESG factors	(2) for the majority of our externally managed AUM	(3) for a minority of our externally managed AUM
(D) Incorporate material ESG factors throughout their portfolio construction	(2) for the majority of our externally managed AUM	(3) for a minority of our externally managed AUM
(E) Engage with underlying portfolio assets to address ESG risks and opportunities	(2) for the majority of our externally managed AUM	(3) for a minority of our externally managed AUM
(F) Comply with their own exclusions policy	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(G) Embed ESG considerations in contractual documentation	(3) for a minority of our externally managed AUM	(3) for a minority of our externally managed AUM
(H) Implement adequate disclosure and accountability mechanisms	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM

(I) Are willing to work in partnership with our organisation to develop their responsible investment approach	(3) for a minority of our externally managed AUM	(3) for a minority of our externally managed AUM
---	--	--

(J) Track the positive and negative sustainability outcomes of their activities	(3) for a minority of our externally managed AUM	(3) for a minority of our externally managed AUM
---	--	--

(K) Other, please specify:	NA (1) for all of our externally managed AUM	NA (1) for all of our externally managed AUM
----------------------------	---	---

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 5	PLUS	OO 11	N/A	PUBLIC	Investment practices	1

Does your organisation, or the investment consultants acting on your behalf, expressly assess the following practices regarding derivatives and short positions as part of your manager selection process? (Indicate the proportion of your AUM to which each of these selection practices applies, regardless of when you selected your different external managers.)

(A) We assess whether they apply ESG incorporation into derivatives, insurance instruments (such as CDS) and other synthetic exposures or positions	(2) for all of our externally managed AUM
---	---

(B) We assess how they apply their exclusion policies to short and derivative exposures	(2) for all of our externally managed AUM
---	---

(C) We assess whether their use of leverage is aligned with their responsible investment policy	(2) for all of our externally managed AUM
---	---

Sustainability outcomes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 10	PLUS	OO 11	N/A	PUBLIC	Sustainability outcomes	1

How does your organisation, or the investment consultant acting on your behalf, assess external managers' approaches to their sustainability outcomes as part of your selection process? (Indicate the proportion of your AUM to which each of these selection practices applies, regardless of when you selected your different external managers.)

(A) We assess their track records on advancing sustainability outcomes across their assets (1) for all of our externally managed AUM

(B) We assess whether they have set targets for the sustainability outcomes of their activities or are willing to incorporate our own targets (1) for all of our externally managed AUM

(C) We assess how they use key levers including asset allocation, engagement and stewardship activities to advance sustainability outcomes (1) for all of our externally managed AUM

(D) We assess how well they report on their progress on sustainability outcomes across their assets (1) for all of our externally managed AUM

Documentation and track record

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 11	CORE	OO 11	N/A	PUBLIC	Documentation and track record	1

As part of your selection process, which documents does your organisation, or the investment consultants acting on your behalf, review to gain confidence in external managers' responsible investment practices? (Indicate the proportion of your AUM to which each of these selection practices applies, regardless of when you selected your different external managers.)

(A) Standard client reporting, responsible investment reports or impact reports (1) for all of our externally managed AUM

(B) Responsible investment methodology and its influence on past investment decisions	(1) for all of our externally managed AUM
(C) Historical voting and engagement activities with investees	(2) for the majority of our externally managed AUM
(D) Historical engagement activities with policymakers	(3) for a minority of our externally managed AUM
(E) Compliance manuals and portfolios to ensure universal construction rules are applied (e.g. exclusions, thematic, best-in-class definitions and thresholds)	(3) for a minority of our externally managed AUM
(F) Controversies and incidence reports	(3) for a minority of our externally managed AUM
(G) Code of conduct or codes of ethics	(2) for the majority of our externally managed AUM
(H) Other, please specify: Because we custody the majority of listed equity assets, points A-H relate to our own policies rather than the policies of our subadvisors. From that perspective, we would answer (1) for all of our externally managed AUM.	(1) for all of our externally managed AUM

Appointment

Pooled funds

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 12	CORE	OO 12, OO 5.1, OO 15	N/A	PUBLIC	Pooled funds	4
How did your organisation, or the investment consultants acting on your behalf, include responsible investment requirements for pooled funds in your current contracts with external managers? (Indicate the proportion of your AUM invested in pooled funds to which each of these requirements applies, regardless of when you appointed your different external managers.)						
(A) We amended or instituted side letters or equivalent legal documentation to include responsible investment requirements	(1) for all of our AUM invested in pooled funds					

(B) We encouraged the external manager to include responsible investment requirements into the investment mandate, the investment management agreement or equivalent legal documentation

(1) for all of our AUM invested in pooled funds

Segregated mandates

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 13	CORE	OO 12, OO 5.1	N/A	PUBLIC	Segregated mandates	4

When setting up segregated mandates with external managers, which responsible investment clauses did your organisation, or the investment consultants acting on your behalf, include in your current contractual agreements? (Indicate the proportion of your AUM invested in segregated funds to which each of these requirements applies, regardless of when you appointed your different external managers.)

(A) The manager's commitment to follow our responsible investment strategy in the management of our assets

(3) for a minority of our AUM invested in segregated mandates

(B) The manager's commitment to incorporate material ESG factors into its investment and stewardship activities

(3) for a minority of our AUM invested in segregated mandates

(C) Exclusion list(s)

(3) for a minority of our AUM invested in segregated mandates

(D) Responsible investment communication and reporting obligations, including on stewardship activities and results

(3) for a minority of our AUM invested in segregated mandates

(E) Stewardship commitments in line with the PRI's guidance and focused on seeking sustainability outcomes and prioritising common goals and collaborative action

(4) for none of our AUM invested in segregated mandates

(F) Where applicable, commitment to fulfil a clear policy on security lending aligned with our own security lending policy or with the ICGN Securities Lending Code of Best Practice

(2) for the majority of our AUM invested in segregated mandates

(G) Incentives and controls to ensure alignment of interests

(1) for all of our AUM invested in segregated mandates

(H) Commitments on climate-related disclosure in line with internationally recognised frameworks such as the TCFD

(4) for none of our AUM invested in segregated mandates

(I) If applicable, commitment to disclose against the EU Taxonomy

(4) for none of our AUM invested in segregated mandates

(J) Commitment to respect human rights as defined in the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights

(4) for none of our AUM invested in segregated mandates

(K) The manager's acknowledgement that their appointment was conditional on their fulfilment of their responsible investment obligations

(3) for a minority of our AUM invested in segregated mandates

(L) Other, please specify:

n/a

(4) for none of our AUM invested in segregated mandates

Monitoring

Investment practices

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 14	CORE	OO 13	N/A	PUBLIC	Investment practices	1

During the reporting year, which aspects of your external manager's responsible investment practices did you, or your investment consultant acting on your behalf, monitor?

(1) Listed equity (active)

(3) Fixed income (active)

(A) We monitored their alignment with our organisation's responsible investment strategy

(1) for all of our externally managed AUM

(1) for all of our externally managed AUM

(B) We monitored any changes in their responsible investment-related policies, resourcing, oversight and responsibilities or investment processes

(1) for all of our externally managed AUM

(1) for all of our externally managed AUM

(C) We monitored their use of ESG data, benchmarks, tools and certifications

(1) for all of our externally managed AUM

(1) for all of our externally managed AUM

(D) We monitored how ESG incorporation affected investment decisions	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(E) We monitored how ESG incorporation affected the fund's financial and ESG performance	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(F) We monitored any changes in ESG risk management processes	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(G) We monitored their response to material ESG incidents	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(H) Other, please specify:	■ NA (1) for all of our externally managed AUM	■ NA (1) for all of our externally managed AUM
	(5) Private equity	(6) Real estate
(A) We monitored their alignment with our organisation's responsible investment strategy	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(B) We monitored any changes in their responsible investment-related policies, resourcing, oversight and responsibilities or investment processes	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(C) We monitored their use of ESG data, benchmarks, tools and certifications	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM

(D) We monitored how ESG incorporation affected investment decisions	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(E) We monitored how ESG incorporation affected the fund's financial and ESG performance	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(F) We monitored any changes in ESG risk management processes	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(G) We monitored their response to material ESG incidents	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(H) Other, please specify:	■ NA (1) for all of our externally managed AUM	■ NA (1) for all of our externally managed AUM
	(7) Infrastructure	(8) Hedge funds
(A) We monitored their alignment with our organisation's responsible investment strategy	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(B) We monitored any changes in their responsible investment-related policies, resourcing, oversight and responsibilities or investment processes	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(C) We monitored their use of ESG data, benchmarks, tools and certifications	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM

(D) We monitored how ESG incorporation affected investment decisions	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
--	---	---

(E) We monitored how ESG incorporation affected the fund's financial and ESG performance	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
--	---	---

(F) We monitored any changes in ESG risk management processes	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
---	---	---

(G) We monitored their response to material ESG incidents	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
---	---	---

(H) Other, please specify:	NA (1) for all of our externally managed AUM	NA (1) for all of our externally managed AUM
----------------------------	---	---

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 16	PLUS	OO 13	N/A	PUBLIC	Investment practices	1

Provide an example of a leading practice you adopted as part of your monitoring of your external managers' responsible investment practices in private equity, real estate and/ or infrastructure during the reporting year.

Please provide examples below:

(A) Private equity

During initial due diligence we review a copy of the organizations ESG policy, ask the manager to complete an ESG focused RFI and hold a one-to-one meeting with the team responsible for ESG to understand how ESG is integrated into their investment process. Once invested we regularly monitor the managers approach against their policy and feedback provided in the RFI and one-to-one. In private equity for healthcare investments within our impact mandates, we monitor a number of environmental and social KPIs such as, number of patients screened, number of patients completed treatment, number of patients with new access, number of patients with a decrease in their healthcare expenditure, number of full-time roles filled by women or minorities. This data is collected annually and discussed with the manager to ensure they are making a concerted effort to improve and create a positive impact.

(B) Real estate

During initial due diligence we review a copy of the organizations ESG policy, ask the manager to complete an ESG focused RFI and hold a one-to-one meeting with the team responsible for ESG to understand how ESG is integrated into their investment process. Once invested we regularly monitor the managers approach against their policy and feedback provided in the RFI and one-to-one. For real estate investments we monitor third-party certifications such as GRESB, BREEAM, NABERS and LEED. This data is collected annually and discussed with the manager to ensure they are making a concerted effort to improve and create a positive impact.

(C) Infrastructure

During initial due diligence we review a copy of the organizations ESG policy, get the manager to complete an ESG focused RFI and hold a one-to-one meeting with the team responsible for ESG to understand how ESG is integrated into their investment process. Once invested we regularly monitor the managers approach against their policy and feedback provided in the RFI and one-to-one. For renewable infrastructure investments within our impact mandates, we monitor a number of environmental and social KPIs such as GHG emissions (tons sequestered and tons avoided), renewable energy generated, number of full-time roles filled by women or minorities. This data is collected annually and discussed with the manager to ensure they are making a concerted effort to improve and create a positive impact.

Sustainability outcomes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 19	PLUS	OO 13	N/A	PUBLIC	Sustainability outcomes	1

During the reporting year, how did your organisation, or the investment consultants acting on your behalf, monitor your external managers' progress on sustainability outcomes?

- ☐ (A) We reviewed progress on the sustainability outcomes of their activities
- ☐ (B) We reviewed how they used asset allocation individually or in partnership with others to make progress on sustainability outcomes
- ☒ (C) We reviewed how they used individual or collaborative investee engagement, including voting, to make progress on sustainability outcomes
- ☒ (D) We reviewed how they used individual or collaborative systemic stewardship, including policy engagement, to make progress on sustainability outcomes
- ☐ (E) We reviewed how they contributed to public goods (such as research) or public discourse (such as media) or collaborated with other actors to track and communicate progress against global sustainability goals
- ☒ (F) Other, please specify:
 For bespoke mandates we have reviewed progress on sustainability outcomes of their activities and how they contributed to public goods, public discourse, and collaborated with other actors to track and communicate progress against specific sustainability goals.
- ☐ (G) We did not review their progress on sustainability outcomes

Review

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 20	CORE	OO 13	N/A	PUBLIC	Review	1

During the reporting year, how often did your organisation, or the investment consultants acting on your behalf, require your external managers to report to you on their responsible investment practices?

	(1) Listed equity (active)	(3) Fixed income (active)
(A) Quarterly or more often	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(B) Every six months	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(C) Annually	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM

(D) Less than once a year	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
---------------------------	--	--

(E) On an ad hoc basis (e.g. whenever significant changes, incidents or ESG-linked events occur)	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
--	--	--

(5) Private equity

(6) Real estate

(A) Quarterly or more often	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
-----------------------------	---	---

(B) Every six months	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
----------------------	--	--

(C) Annually	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
--------------	--	--

(D) Less than once a year	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
---------------------------	--	--

(E) On an ad hoc basis (e.g. whenever significant changes, incidents or ESG-linked events occur)	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
--	--	--

(7) Infrastructure

(8) Hedge funds

(A) Quarterly or more often	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
-----------------------------	---	---

(B) Every six months	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
----------------------	--	--

(C) Annually	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
--------------	--	--

(D) Less than once a year	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
---------------------------	--	--

(E) On an ad hoc basis (e.g. whenever significant changes, incidents or ESG-linked events occur)

(4) for none of our externally managed AUM

(4) for none of our externally managed AUM

Engagement and escalation

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 22	CORE	OO 13	N/A	PUBLIC	Engagement and escalation	1

Which actions does your organisation, or the investment consultants acting on your behalf, include in its formal escalation process to address concerns raised during monitoring?

	(1) Listed equity (active)	(3) Fixed income (active)	(5) Private equity	(6) Real estate	(7) Infrastructure	(8) Hedge funds
(A) We notify the external manager about their placement on a watch list	☒	☒	☒	☒	☒	☒
(B) We engage the external manager's board or investment committee	☒	☒	☒	☒	☒	☒
(C) We reduce exposure with the external manager until any non-conformances have been rectified	☐	☐	☐	☐	☐	☐
(D) We terminate the contract with the external manager if failings persist over a (notified) period of time and explain the reasons for the termination	☐	☐	☐	☐	☐	☐
(E) Other, please specify	☐	☐	☐	☐	☐	☐

(F) Our organisation does not have a formal escalation process to address concerns raised by monitoring ☐ ☐ ☐ ☐ ☐ ☐

Listed Equity (LE)

Pre-investment phase

Materiality analysis

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 1	CORE	OO 10	LE 1.1	PUBLIC	Materiality analysis	1

Does your organisation have a formal investment process to identify material ESG factors across listed equities?

(2) Active – quantitative

(A) Yes, we have a formal process to identify material ESG factors for all of our assets ☒

(B) Yes, we have a formal process to identify material ESG factors for the majority of our assets ☐

(C) Yes, we have a formal process to identify material ESG factors for a minority of our assets ☐

(D) No, we do not have a formal process. Our investment professionals identify material ESG factors at their own discretion ☐

(E) No, we do not have a formal process to identify material ESG factors ☐

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 1.1	CORE	LE 1	N/A	PUBLIC	Materiality analysis	1

How does your current investment process incorporate material ESG factors?

(2) Active - Quantitative

(A) The investment process incorporates material governance factors



(B) The investment process incorporates material environmental and social factors



(C) The investment process incorporates material ESG factors beyond our organisation's typical investment time horizon



(D) The investment process incorporates the effect of material ESG factors on revenues and business operations



Long-term ESG trend analysis

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 2	CORE	OO 10	N/A	PUBLIC	Long-term ESG trend analysis	1

Do you continuously monitor a list of identified long-term ESG trends related to your listed equity assets?

(2) Active – quantitative

(A) We monitor long-term ESG trends for all assets



(B) We monitor long-term ESG trends for the majority of assets ☐

(C) We monitor long-term ESG trends for a minority of assets ☐

(D) We do not continuously monitor long-term ESG trends in our investment process ☐

ESG incorporation

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 3	CORE	OO 10	LE 3.1	PUBLIC	ESG incorporation	1

How does your financial modelling and equity valuation process incorporate material ESG risks?

(2) Active – quantitative

(A) We incorporate governance-related risks into financial modelling and equity valuations ☒

(B) We incorporate environmental and social risks into financial modelling and equity valuations ☒

(C) We incorporate environmental and social risks related to companies' supply chains into financial modelling and equity valuations ☒

(D) ESG risk is incorporated into financial modelling and equity valuations at the discretion of individual investment decision-makers, and we do not track this process ☐

(E) We do not incorporate ESG risks into our financial modelling and equity valuations



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 3.1	CORE	LE 3	N/A	PUBLIC	ESG incorporation	1

In what proportion of cases do you incorporate the following material ESG risks into your financial modelling and equity valuation process?

(2) Active - Quantitative

(A) We incorporate governance-related risks into financial modelling and equity valuations (3) in a minority of cases

(B) We incorporate environmental and social risks into financial modelling and equity valuations (3) in a minority of cases

(C) We incorporate environmental and social risks related to companies' supply chains into financial modelling and equity valuations (3) in a minority of cases

Assessing ESG performance

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 4	CORE	OO 10	LE 4.1	PUBLIC	Assessing ESG performance	1

What information do you incorporate when you assess the ESG performance of companies in your financial modelling and equity valuation process?

(2) Active – quantitative

(A) We incorporate information on current performance across a range of ESG metrics ☒

(B) We incorporate information on historical performance across a range of ESG metrics



(C) We incorporate information enabling performance comparison within a selected peer group across a range of ESG metrics



(D) We incorporate information on ESG metrics that may impact or influence future corporate revenues and/or profitability



(E) We do not incorporate ESG factors when assessing the ESG performance of companies in our financial modelling or equity valuation



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 4.1	CORE	LE 4	N/A	PUBLIC	Assessing ESG performance	1

In what proportion of cases do you incorporate the following information when assessing the ESG performance of companies in your financial modelling and equity valuation process?

(2) Active – quantitative

(A) We incorporate information on current performance across a range of ESG metrics (3) in a minority of cases

(B) We incorporate information on historical performance across a range of ESG metrics (3) in a minority of cases

(C) We incorporate information enabling performance comparison within a selected peer group across a range of ESG metrics (3) in a minority of cases

(D) We incorporate information on ESG metrics that may impact or influence future corporate revenues and/or profitability (3) in a minority of cases

ESG incorporation in portfolio construction

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 5	PLUS	OO 10	N/A	PUBLIC	ESG incorporation in portfolio construction	1

Outline one best practice or innovative example where ESG factors have been incorporated into your equity selection and research process.

In the evaluation of ESG factors, we have chosen to focus on those factors that are identified as financially material. In 2017, we developed our in-house ESG metrics for measuring company-level performance on sustainability issues. These scores leverage the Sustainability Accounting Standards Board (SASB) framework for identifying material ESG issues for each company based on industry. These scores are used both to evaluate our funds and to tilt portfolios with explicit ESG objectives away from the lowest scoring companies and towards high performers.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 6	CORE	OO 10	LE 6.1	PUBLIC	ESG incorporation in portfolio construction	1

How do ESG factors influence your portfolio construction?

(2) Active – quantitative

(A) The selection of individual assets within our portfolio is influenced by ESG factors



(B) The holding period of individual assets within our portfolio is influenced by ESG factors



(C) The portfolio weighting of individual assets within our portfolio or benchmark is influenced by ESG factors



(D) The allocation of assets across multi-asset portfolios is influenced by ESG factors through the strategic asset allocation process ☐

(E) Other expressions of conviction (please specify below) ☐

(F) The portfolio construction or benchmark selection does not explicitly include the incorporation of ESG factors ☐

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 6.1	CORE	LE 6	N/A	PUBLIC	ESG incorporation in portfolio construction	1

In what proportion of cases did ESG factors influence your portfolio construction?

(2) Active – quantitative

(A) The selection of individual assets within our portfolio is influenced by ESG factors (3) in a minority of cases

(C) The portfolio weighting of individual assets within our portfolio or benchmark is influenced by ESG factors (3) in a minority of cases

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 7	PLUS	OO 10	N/A	PUBLIC	ESG incorporation in portfolio construction	1

Please provide two examples of how ESG factors have influenced weightings and tilts in either passive or active listed equity.

Provide examples below:

(A) Example 1:

In our Decarbonization 2.0 strategy, we will modify security weights based on Material ESG scores--potentially increasing allocations to securities with high Material ESG scores and potentially decreasing allocations to securities with low Material ESG scores

(B) Example 2:

For our commingled Europe and Australia funds, we have excluded tobacco and controversial weapons securities.

ESG risk management

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 8	CORE	OO 6.1 LE	N/A	PUBLIC	ESG risk management	1

What compliance processes do you have in place to ensure that your listed equity assets subject to negative exclusionary screens meet the screening criteria?

☐ (A) We have an independent committee that oversees the screening implementation process, but only for our ESG/sustainability labelled funds that are subject to negative exclusionary screening

☐ (B) We have an independent committee that oversees the screening implementation process for all of our listed equity assets that are subject to negative exclusionary screening

☐ (C) We have an independent committee that verifies that we have correctly implemented pre-trade checks in our internal systems to ensure no execution is possible without their pre-clearance

☒ (D) Other, please specify:

Many layers of internal controls exist to oversee the screening process including an automated strategy implementation processes, monthly portfolio manager certification, annual performance reviews, exclusion committees, audits by compliance department, and other systematic checks.

In addition, external audits are undertaken of funds subject to exclusions; however, practices vary across the many regions in which we operate.

☐ (E) We do not have compliance processes in place to ensure that we meet our stated negative exclusionary screens

Post-investment phase

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 9	CORE	OO 10	N/A	PUBLIC	ESG risk management	1

Do your regular reviews incorporate ESG risks?

(2) Active – quantitative

(A) Our regular reviews include quantitative information on material ESG risks specific to individual listed equities

☐

(B) Our regular reviews include aggregated quantitative information on material ESG risks at a fund level

☒

(C) Our regular reviews only highlight fund holdings where ESG ratings have changed

☐

(D) We do not conduct regular reviews. Risk reviews of ESG factors are conducted at the discretion of the individual fund manager and vary in frequency

☐

(E) We do not conduct reviews

☐

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

Do you regularly identify and incorporate ESG incidents into the investment process for your listed equity assets?

(2) Active – quantitative

(A) Yes, we have a formal process in place for regularly identifying and incorporating ESG incidents into all of our investment decisions

☐

(B) Yes, we have a formal process in place for regularly identifying and incorporating ESG incidents into the majority of our investment decisions

☐

(C) Yes, we have a formal process in place for regularly identifying and incorporating ESG incidents into a minority of our investment decisions

☒

(D) Yes, we have an ad hoc process in place for identifying and incorporating ESG incidents

☐

(E) Other

☐

(F) We currently do not have a process in place for regularly identifying and incorporating ESG incidents into our investment decision-making

☐

Reporting/Disclosure

Sharing ESG information with stakeholders

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 13	CORE	OO 6 LE	N/A	PUBLIC	Sharing ESG information with stakeholders	6

How do you ensure that clients and/or beneficiaries understand ESG screens and their implications?

	(1) for all of our listed equity assets subject to ESG screens	(2) for the majority of our listed equity assets subject to ESG screens	(3) for a minority of our listed equity assets subject to ESG screens	(4) for none of our assets subject to ESG screens
(A) We publish a list of ESG screens and share it on a publicly accessible platform such as a website or through fund documentation	☒	☐	☐	☐
(B) We publish any changes in ESG screens and share them on a publicly accessible platform such as a website or through fund documentation	☒	☐	☐	☐
(C) We outline any implications of ESG screens, such as deviation from a benchmark or impact on sector weightings, to clients and/or beneficiaries	☒	☐	☐	☐

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 14	CORE	OO 10	N/A	PUBLIC	Sharing ESG information with stakeholders	6

What ESG information is covered in your regular reporting to stakeholders such as clients or beneficiaries?

(2) Active – quantitative

(A) Our regular stakeholder reporting includes qualitative examples of engagement and/or ESG incorporation	3) In a minority of our stakeholder reporting
(B) Our regular stakeholder reporting includes quantitative ESG engagement data	3) In a minority of our stakeholder reporting
(C) Our regular stakeholder reporting includes quantitative ESG incorporation data	2) In the majority of our regular stakeholder reporting

Stewardship

Voting policy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 15	CORE	OO 9 LE	LE 15.1, LE 16	PUBLIC	Voting policy	2

Does your organisation have a publicly available (proxy) voting policy? (The policy may be a standalone policy, part of a stewardship policy or incorporated into a wider RI policy.)

● **(A) Yes, we have a publicly available (proxy) voting policy Add link(s):**

<https://russellinvestments.com/-/media/files/us/corporate/russell-investments-proxy-voting-guidelines.pdf?la=en&hash=83A27EE4ECF45299CB2D0CB04D847E6F753441BD>

- (B) Yes, we have a (proxy) voting policy, but it is not publicly available
- (C) No, we do not have a (proxy) voting policy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 15.1	CORE	OO 9 LE, LE 15	N/A	PUBLIC	Voting policy	2

What percentage of your listed equity assets does your (proxy) voting policy cover?

(A) Actively managed listed equity covered by our voting policy (12) 100%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 16	CORE	LE 15	N/A	PUBLIC	Voting policy	2

Does your organisation's policy on (proxy) voting cover specific ESG factors?

☒ (A) Our policy includes voting guidelines on specific governance factors Describe:

The majority of Russell Investments' Proxy Voting Guidelines support governance structures that ensure that management and board members maintain independence, objectivity, and act in the best interest of shareholders. The guidelines provide specific direction on Director Elections, addressing issues such as overboarding and diversity. Section VII of our guidelines is dedicated entirely to Corporate Governance, and includes our policies on specific issues such as proxy access, golden coffin payments, and more. Further details can be found in our Proxy Voting Guidelines.

☒ (B) Our policy includes voting guidelines on specific environmental factors Describe:

Section XIV of our proxy voting guidelines refers to environmental issues which are at risk of negatively impacting shareholder value. Russell Investments does not apply a blanket policy to environmental issues, and so proposals that fall into this category are, in most cases, directed to the Proxy Voting and Engagement Committee for individual review. Environmental issues which may be directed to the Committee per this section include ESG reporting, water issues, calls for the reduction of greenhouse gas emission, requests that a company adopt a comprehensive recycling strategy or invest in renewable energy sources, among others. Further details can be found in our Proxy Voting Guidelines.

☒ (C) Our policy includes voting guidelines on specific social factors Describe:

Section XIV of our proxy voting guidelines also covers social issues which are at risk of negatively impacting shareholder value, through financial or reputational hardship. As with environmental proposals, many social issue votes are frequently referred to the Proxy Voting committee for assessment. The guidelines specifically address issues such as workplace safety, product safety, diversity and equal opportunity employment, as well as political and human rights issues. Further details can be found in our Proxy Voting Guidelines.

☐ (D) Our policy is high-level and does not cover specific ESG factors Describe:

Alignment & effectiveness

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 17	CORE	OO 9 LE	N/A	PUBLIC	Alignment & effectiveness	2

When you use external service providers to give voting recommendations, how do you ensure that those recommendations are consistent with your organisation's (proxy) voting policy?

(A) We review service providers' controversial and high-profile voting recommendations before voting is executed (1) in all cases

(B) Before voting is executed, we review service providers' voting recommendations where the application of our voting policy is unclear (1) in all cases

Security lending policy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 18	CORE	OO 9 LE	LE 18.1, LE 18.2	PUBLIC	Security lending policy	2

Does your organisation have a public policy that states how voting is addressed in your securities lending programme? (The policy may be a standalone guideline or part of a wider RI or stewardship policy.)

- (A) We have a public policy to address voting in our securities lending programme. Add link(s):
- (B) We have a policy to address voting in our securities lending programme, but it is not publicly available
- (C) We rely on the policy of our service provider(s)
- (D) We do not have a policy to address voting in our securities lending programme
- (E) Not applicable, we do not have a securities lending programme

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 18.1	CORE	LE 18	N/A	PUBLIC	Security lending policy	2

How is voting addressed in your securities lending programme?

☒ (A) We recall all securities for voting on all ballot items

- ☐ (B) We always recall all holdings in a company for voting on ballot items deemed important (e.g. in line with specific criteria)
- ☐ (C) We always recall some securities so that we can vote on their ballot items (e.g. in line with specific criteria)
- ☐ (D) We maintain some holdings so that we can vote at any time
- ☐ (E) We recall some securities on an ad hoc basis so that we can vote on their ballot items
- ☐ (F) We empower our securities lending agent to decide when to recall securities for voting purposes
- ☐ (G) Other, please specify:
- ☐ (H) We do not recall our securities for voting purposes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 18.2	CORE	LE 18	N/A	PUBLIC	Security lending policy	2

What exclusions do you apply to your organisation's securities lending programme?

- ☐ (A) We do not lend out shares of companies that we are engaging with either individually or as a lead or support investor in collaborative engagements
- ☐ (B) We do not lend out shares of companies if we own more than a certain percentage of them
- ☐ (C) We do not lend out shares of companies in jurisdictions that do not ban naked short selling
- ☐ (D) We never lend out all our shares of a company to ensure that we always keep voting rights in-house
- ☒ (E) Other, please specify:

Russell Investments recalls all shares of a company if Russell Investments owns more than 2% or in the case of a potential or definite pending merger or acquisition. The shares are restricted from lending until the record date has passed.
- ☐ (F) We do not exclude any particular companies from our securities lending programme

Shareholder resolutions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 19	CORE	OO 9 LE	N/A	PUBLIC	Shareholder resolutions	2

Which of the following best describes your decision-making approach regarding shareholder resolutions, or that of your service provider(s) if decision-making is delegated to them?

- ☒ (A) In the majority of cases, we support resolutions that, if passed, are expected to advance progress on the underlying ESG factors or on our stewardship priorities
- ☐ (B) In the majority of cases, we support resolutions that, if passed, are expected to advance progress on the underlying ESG factors but only if the investee company has not already committed publicly to the action requested in the proposal
- ☐ (C) In the majority of cases, we only support shareholder resolutions as an escalation tactic when other avenues for engagement with the investee company have not achieved sufficient progress
- ☐ (D) In the majority of cases, we support the recommendations of investee company management by default
- ☐ (E) In the majority of cases, we do not vote on shareholder resolutions

Pre-declaration of votes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 20	CORE	OO 9 LE	N/A	PUBLIC	Pre-declaration of votes	2

How did your organisation or your service provider(s) pre-declare votes prior to AGMs/EGMs?

- ☐ (A) We pre-declared our voting intentions publicly through the PRI's vote declaration system
- ☐ (B) We pre-declared our voting intentions publicly (e.g. through our own website) Link to public disclosure:
- ☐ (C) We pre-declared our voting intentions publicly through the PRI's vote declaration system, including the rationale for our (proxy) voting decisions where we planned to vote against management proposals or abstain
- ☐ (D) We pre-declared our voting intentions publicly, including the rationale for our (proxy) voting decisions where we planned to vote against management proposals or abstain Link to public disclosure:
- ☐ (E) Prior to the AGM/EGM, we privately communicated our voting decision to investee companies in cases where we planned to vote against management proposals or abstain
- ☒ (F) We did not privately or publicly communicate our voting intentions
- ☐ (G) We did not cast any (proxy) votes during the reporting year

Voting disclosure post AGM/EGM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 21	CORE	OO 9 LE	LE 21.1	PUBLIC	Voting disclosure post AGM/EGM	2

Do you publicly report your (proxy) voting decisions, or those made on your behalf by your service provider(s), in a central source?

- (A) Yes, for >95% of (proxy) votes Link:
- (B) Yes, for the majority of (proxy) votes Link:
13
<https://viewpoint.glasslewis.com/WD/?siteId=RussellInd> ; <https://viewpoint.glasslewis.com/WD/?siteId=RussellInst> ;
<https://viewpoint.glasslewis.com/WD/?siteId=RussellAus> ; <https://viewpoint.glasslewis.com/WD/?siteId=RussellCan> ;
- (C) Yes, for a minority of (proxy) votes 1) Add link and 2) Explain why you only publicly disclose a minority of (proxy) voting decisions:
- (D) No, we do not publicly report our (proxy) voting decisions Explain why you do not publicly report your (proxy) voting decisions:

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 21.1	CORE	LE 21	N/A	PUBLIC	Voting disclosure post AGM/EGM	2

In the majority of cases, how soon after an investee's AGM/EGM do you publish your voting decisions?

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

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 22	CORE	OO 9 LE	LE 22.1	PUBLIC	Voting disclosure post AGM/EGM	2

Did your organisation and/or the service provider(s) acting on your behalf communicate the rationale for your voting decisions?

- ☒ (A) In cases where we voted against management recommendations or abstained, the rationale was provided privately to the company
- ☐ (B) In cases where we voted against management recommendations or abstained, the rationale was disclosed publicly
- ☐ (C) In cases where we voted against management recommendations or abstained, we did not communicate the rationale
- ☐ (D) We did not vote against management or abstain

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 22.1	CORE	LE 22	N/A	PUBLIC	Voting disclosure post AGM/EGM	2

Indicate the proportion of votes where you and/or the service provider(s) acting on your behalf communicated the rationale for your voting decisions.

(A) In cases where we voted against management recommendations or abstained, the rationale was provided privately to the company (1) 1–10%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 23	CORE	OO 9 LE	LE 23.1	PUBLIC	Voting disclosure post AGM/EGM	2, 5

Did your organisation and/or the service provider(s) acting on your behalf communicate the rationale for your voting decisions when voting against a shareholder resolution proposed/filed by a PRI signatory?

- ☐ (A) In cases where we voted against a shareholder resolution proposed/filed by a PRI signatory, the rationale was disclosed publicly
- ☒ (B) In cases where we voted against a shareholder resolution proposed/filed by a PRI signatory, the rationale was not disclosed publicly
- ☐ (C) We did not vote against any shareholder resolution proposed/filed by a PRI signatory

Alignment & effectiveness

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 24	PLUS	OO 9 LE	N/A	PUBLIC	Alignment & effectiveness	2

How are you contributing to the integrity of the end-to-end voting chain and confirmation process?

In 2020, to ensure that our practices are aligned with best practice principles, the Proxy Voting and Engagement Committee instituted a new internal audit process to ensure that our proxy service provider accurately casts votes in accordance with our guidelines. Although this internal audit process was already in place for certain funds due to regional regulatory requirements, the Proxy Voting and Engagement Committee has made the decision, alongside our internal risk team, to expand the audit process to include all funds in all jurisdictions. This level of oversight helps to hold our proxy service provider accountable for executing the services they provide fully and accurately.

Sustainability Outcomes (SO)

Set targets on sustainability outcomes

Outcome objectives

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 1	PLUS	ISP 45	SO 1.1, SO 2	PUBLIC	Outcome objectives	1

Has your organisation chosen to shape any specific sustainability outcomes?

- ☒ (A) Yes
☐ (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 2	PLUS	SO 1	SO 3	PUBLIC	Outcome objectives	1

Please list up to 10 of the specific sustainability outcomes that your organisation has chosen to shape.

Sustainability outcomes

(A) Sustainability Outcome #1 Net zero

Target-setting process

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 3	PLUS	SO 2	SO 3.1	PUBLIC	Target-setting process	1

Have you set any targets for your sustainability outcomes? Indicate how many targets you have set for each sustainability outcome.

(A) Sustainability Outcome #1: (2) One target

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 3.1	PLUS	SO 3	Multiple, see guidance	PUBLIC	Target-setting process	1

For each sustainability outcome, name and provide a brief description of up to two of your targets and list the metrics or key performance indicators (KPIs) associated with them, the targets' deadlines and the percentage of your assets under management to which the targets apply.

	Target name	Target description
(A1) Sustainability Outcome #1: (Target 1)	Net zero carbon emissions by 2050	To be developed over next 12 months
	KPIs/metrics	Target deadline: Year

(A1) Sustainability Outcome #1: (Target 1)	Net zero emissions in AUM	2050
---	---------------------------	------

Coverage: % of assets under management

(A1) Sustainability Outcome #1: (Target 1)	100
--	-----

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 4	PLUS	SO 3.1	N/A	PUBLIC	Target-setting process	1

Which global goals (or other references) did your organisation use to determine your sustainability outcomes targets? Explain whether you have derived your target from global goals, e.g. by translating a global goal into a target at the national, regional, sub-national, sectoral or sub-sectoral level. Alternatively, explain why you have set your target independently from global goals.

Global goals/references

(A1) Sustainability Outcome #1: (Target 1)

As a leading global investment solutions partner dedicated to improving people's financial security, Russell Investments understands the importance of being a responsible investor and an active steward of our clients' capital. But this responsibility and opportunity extends beyond the client-steward relationship: our investment approach brings the world's leading managers and strategies together into diversified portfolios, and as a result, we occupy a unique point of influence between our clients, investment manager partners, standards bodies, and corporate entities.

Tracking progress

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 5	PLUS	SO 3.1	SO 5.1, SO 5.2	PUBLIC	Tracking progress	1

Does your organisation track intermediate performance and progress against your sustainability outcomes targets?

(A1) Sustainability Outcome #1: (Target 1)

(1) Yes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 5.1	PLUS	SO 5	N/A	PUBLIC	Tracking progress	1

How does your organisation track intermediate performance and progress against your sustainability outcomes targets?

Please describe below:

(A1) Sustainability Outcome #1: (Target 1)

Russell Investments publishes an annual Proxy and Engagement Report that we share publicly on our webpage.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 5.2	PLUS	SO 5	N/A	PUBLIC	Tracking progress	1

Describe any qualitative or quantitative progress achieved during the reporting year against your sustainability outcomes targets.

(1) Qualitative progress

(2) Quantitative progress

(A1) Sustainability Outcome #1:
(Target 1)

We are developing targets over the next 12 months for Net Zero.

We are developing targets over the next 12 months for Net Zero.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 6	PLUS	SO 3.1	SO 6.1	PUBLIC	Tracking progress	2

Despite your organisation's efforts to make progress on your sustainability outcomes, there may be stakeholders who have been negatively affected by your organisation's activities. For each of your sustainability outcomes, indicate whether your organisation ensures that stakeholders who have been negatively affected are able to seek an effective remedy.

(A) Sustainability Outcome #1:

(1) Yes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 6.1	PLUS	SO 6	N/A	PUBLIC	Tracking progress	2

How does your organisation ensure that stakeholders negatively affected by your activities are able to seek an effective remedy?

Please describe below:

(A) Sustainability Outcome #1:

Russell Investments will be setting targets over the next 12 months for Net Zero.

Investors' individual and collective actions shape outcomes

Levers for shaping outcomes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 7	PLUS	SO 3.1	SO 7.1 - SO 22,	PUBLIC	Levers for shaping outcomes	1, 2, 5

Which levers did your organisation or service providers/external investment managers acting on your behalf use to make progress on your sustainability outcomes during the reporting year?

	(1) Individually	(2) With other investors or stakeholders
(A) Asset allocation	☐	☐
(B) Investee engagement including voting	☐	☐
(C) Systemic stewardship including policy engagement	☐	☐
(D) None of the above	☒	☒

Global stakeholders collaborate to achieve outcomes

Tracking progress against global goals

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 23	PLUS	SO 3.1	N/A	PUBLIC	Tracking progress against global goals	4

Does your organisation engage with standard setters, reporting bodies or similar organisations to help track and communicate progress against global sustainability goals?

☐ (A) Yes. Please describe:

☒ (B) No. Please describe why not:

Russell Investments is developing its strategy for achieving net zero over the next 12 months.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 24	PLUS	SO 3.1	N/A	PUBLIC	Tracking progress against global goals	4

Does your organisation contribute to public goods (such as research) or public discourse (such as media coverage) to make progress on global sustainability goals?

☒ (A) Yes. Please describe:

Our support for net zero is publicly disclosed.

☐ (B) No. Please describe why not: