



Public consultation on institutional investors and asset managers' duties regarding sustainability

Fields marked with * are mandatory.

Introduction

At the end of 2015, governments from around the world chose a more sustainable path for our planet and our economy by adopting the Paris agreement on climate change and the UN 2030 Agenda for Sustainable Development.

Sustainability has since long been at the heart of the European project. The EU is committed to development that meets the needs of the present without compromising the ability of future generations to meet their own needs ([Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions 'Next steps for a sustainable European future European action for sustainability' {SWD\(2016\) 390 final}](#)).

The EU wants its financial system to be aligned with its sustainability objectives. The commitment to incorporating sustainability elements into EU financial services policies and cross cutting initiatives is ingrained in the Mid-Term Review of the Capital Markets Union Action Plan ([Mid-Term Review of the Capital Markets Union Action Plan - COM\(2017\) 292 final](#)).

To develop the overall vision of sustainable finance that this requires, the Commission decided last year to appoint a High-Level Expert Group (HLEG) on sustainable finance under the chairmanship of Christian Thimann. This group is supporting the Commission to develop an overarching and comprehensive EU strategy on sustainable finance.

On 13 July 2017, the HLEG published its interim report which provided a comprehensive vision on sustainable finance. It identified two imperatives for Europe's financial system. "The first is to strengthen financial stability and asset pricing, by improving the assessment and management of long term risks and intangible factors of value creation. The second is to improve the contribution of the financial sector to sustainable and inclusive growth by financing long-term needs and accelerating the shift to a sustainable economy".

In its interim report ([EU High-Level Expert Group on Sustainable Finance, 'Financing a sustainable European economy' Interim report, July 2017](#)), the HLEG proposed eight early recommendations for policy action on sustainable finance. The third recommendation focused on establishing a "fiduciary duty"

that encompasses sustainability. The HLEG suggested clarifying that the duties of institutional investors and asset managers explicitly integrate material environmental, social and governance (ESG) factors and long term sustainability.

Given the maturity and the interest of the HLEG recommendation, the Commission has decided to start work on an impact assessment to assess whether and how a clarification of the duties of institutional investors and asset managers in terms of sustainability could contribute to a more efficient allocation of capital, and to sustainable and inclusive growth.

The duties of care, loyalty and prudence are embedded in the EU's financial framework governing obligations that institutional investors and asset managers owe to their end-investors/scheme members. These duties are the foundation of investment process.

The implementation of these duties implies fulfillment of various obligations for asset managers and institutional investors that include, for instance, the duty to act in the best interest of beneficiaries /investors, with due care, skill and diligence in performing their activities, including the identification and management of conflict of interests. They are also required to act honestly, and ensure adequate and proportionate performance of their activities.

Although these duties are embedded in the EU financial legal framework, it appears unclear that they require institutional investors and asset managers to assess the materiality of sustainability risks (i.e risks relating to environmental, social and governance issues). Market practices indicate that institutional investors and asset managers generally understand these duties as requiring a focus on maximising short-term financial returns and disregard long-term effects on performance due to sustainability factors and risks. This can lead to misallocation of capital and might give rise to concerns about financial stability since markets can be vulnerable to abrupt corrections, such as those associated with the delayed transition to low carbon economies.

This consultation will help the Commission gather and analyse the necessary evidence to determine possible action to improve the assessment and integration of sustainability factors in the relevant investment entities' decision-making process.

Please note: In order to ensure a fair and transparent consultation process **only responses received through our online questionnaire will be taken into account** and included in the report summarising the responses. Should you have a problem completing this questionnaire or if you require particular assistance, please contact fisma-investors-duties-sustainability@ec.europa.eu.

More information:

- [on this consultation](#)
- [on the protection of personal data regime for this consultation](#)

Glossary

Relevant investment entities: entities managing assets entrusted to them

Sustainability factors: for the purpose of this consultation, sustainability factors refer to environmental, social and governance issues as defined by the United Nations Environment Programme (UNEP) ([UNEP Inquiry, Definitions and Concepts: Background Note, 2016](#)). The exact scope of sustainability factors to be addressed is also the object of this consultation.

Environmental issues relate to the quality and functioning of the natural environment and natural systems including biodiversity loss; greenhouse gas emissions, renewable energy, energy efficiency, natural resource depletion or pollution; waste management; ozone depletion; changes in land use; ocean acidification and changes to the nitrogen and phosphorus cycles

Social issues relate to rights, well-being and interests of people and communities including human rights, labour standards, health and safety, relations with local communities, activities in conflict zones, health and access to medicine, consumer protection; and controversial weapons.

Governance issues relate to the management of investee entities. Issues include board structure, size, diversity, skills and independence; executive pay; shareholder rights; stakeholder interaction; disclosure of information; business ethics; bribery and corruption; internal controls and risk management; and, in general, issues dealing with the relationship between a company's management, its board, its shareholders and its other stakeholders.

1. Information about you

* Are you replying as:

- a private individual
- an organisation or a company
- a public authority or an international organisation

* Name of your organisation:

Insight Investment

Contact email address:

The information you provide here is for administrative purposes only and will not be published

joshua.kendall@insightinvestment.com

* Is your organisation included in the Transparency Register?

(If your organisation is not registered, [we invite you to register here](#), although it is not compulsory to be registered to reply to this consultation. [Why a transparency register?](#))

- Yes
- No

* If so, please indicate your Register ID number:

283171720947-78

* Type of organisation:

- Academic institution
- Company, SME, micro-enterprise, sole trader
- Institutional investor
- Consultancy, law firm
- Consumer association
- Industry association
- Media
- Non-governmental organisation
- Think tank
- Trade union
- Other

* Where are you based and/or where do you carry out your activity?

United Kingdom

*Field of activity or sector (*if applicable*):

at least 1 choice(s)

- Accounting
- Auditing
- Banking
- Credit rating agencies
- Insurance
- Occupational pension provision
- Personal pension provision
- Collective Investment Management
- Individual portfolio management
- Financial advice
- Market infrastructure operation (e.g. CCPs, CSDs, Stock exchanges)
- Service provider (e.g. index provider, research providers)
- Other
- Not applicable

Type of funds managed (in the case of asset managers)

- UCITS
- AIFs

Total assets under management in EUR (as of 30.09.2017)

626,700,000,000



Important notice on the publication of responses

* Contributions received are intended for publication on the Commission's website. Do you agree to your contribution being published?

([see specific privacy statement](#) )

- Yes, I agree to my response being published under the name I indicate (*name of your organisation /company/public authority or your name if your reply as an individual*)
- No, I do not want my response to be published

2. Your opinion

2.1 Questions addressed to all respondents:

I. General overview

1) Do you think relevant investment entities should consider sustainability factors in their investment decision-making?

- Yes
- No
- No opinion

Please explain the reasons:

Sustainability (here in ESG) factors are an indicator of short and long-term risk factors.

2) What are the sustainability factors that the relevant investment entities should consider? (Please make a choice and indicate the importance of the different factors (1 is not important and 5 is very important). (Please refer to the definition in the Glossary).

	Yes	No	No opinion
Climate factors (these include climate mitigation factors as well as climate resilience factors)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other environmental factors	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Social factors	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Governance factors	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Others	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify others:

This includes but is not limited to accounting, strategy, regulatory, culture.

Importance for climate factors:

- 1
- 2
- 3
- 4
- 5

Importance for other environmental factors:

- 1
- 2
- 3
- 4
- 5

Importance for social factors:

- 1
- 2
- 3
- 4
- 5

Importance for governance factors:

- 1
- 2
- 3
- 4
- 5

Importance for others:

- 1
- 2
- 3
- 4
- 5

Please specify, which specific factors within the above categories you are considering, if any:

3) Based on which criteria should the relevant investment entities consider sustainability factors in their investment decision making?

Please explain:

Investment entities should consider the ESG factors relevant for individual investment strategies.

4) Which of the following entities should consider sustainability factors in their investment decision-making? (Possibility to select several answers). If so, please indicate the level of impact that this would have (1 is the smallest impact and 5 is the highest impact).

	Yes	No	No opinion
Occupational pension providers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Personal pension providers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Life insurance providers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-life insurance providers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Collective investment funds (UCITS, AIF, EuVECA, EuSEF, ELTIF)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Individual portfolio managers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain:

Level of impact for occupational pension providers:

- 1
- 2
- 3
- 4
- 5

Level of impact for life insurance providers:

- 1
- 2
- 3
- 4
- 5

Level of impact non-life insurance providers:

- 1
- 2
- 3
- 4
- 5

Level of impact for collective investment funds (UCITS, AIF, EuVECA, EuSEF, ELTIF):

- 1
- 2
- 3
- 4
- 5

Level of impact for individual portfolio managers:

- 1
- 2
- 3
- 4
- 5

II. Problem

5) To your knowledge, what share of investment entities active in the EEA (European Economic Area) currently consider sustainability factors in their investment decisions?

	All or almost all	More than two thirds	More than half	More than a third	None or almost none	No opinion
Occupational pension providers	<input type="radio"/>	<input checked="" type="radio"/>				
Personal pension providers	<input type="radio"/>	<input checked="" type="radio"/>				
Life insurance providers	<input type="radio"/>	<input checked="" type="radio"/>				
Non-life insurance providers	<input type="radio"/>	<input checked="" type="radio"/>				
Collective investment funds (UCITS, AIF, EuVECA, EuSEF, ELTIF)	<input type="radio"/>	<input checked="" type="radio"/>				
Individual portfolio managers	<input type="radio"/>	<input checked="" type="radio"/>				

6) To your knowledge, which is the level of integration of sustainability factors by the different investment entities (active in the EEA)?

	High integration	Medium integration	Low integration	No integration	No opinion
Occupational pension providers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Personal pension providers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Life insurance providers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Non-life insurance providers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Collective investment funds (UCITS, AIF, EuVECA, EuSEF, ELTIF)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Individual portfolio managers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

7) Which constraints prevent relevant investment entities from integrating sustainability factors or facilitate their disregard. Please provide the importance of the different constraints that you consider relevant (1 is not important and 5 is very important).

--	--	--	--	--	--	--	--	--	--

	1	2	3	4	5	No opinion
Lack of expertise and experience	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of data/research	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of impact on asset performance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Inadequate methodologies for the calculation of sustainability risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inadequate sustainable impact metrics	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Excessive costs for the scale of your company	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
No interest from financial intermediaries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
No interest from beneficiaries/clients	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European regulatory barriers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National regulatory barriers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of fiscal incentives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of eligible entities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Others	<input type="radio"/>	<input type="radio"/>				

Please provide more details on what the constraints/reasons are and how they limit the integration of sustainability factors:

The constraints for further ESG integration are numerous. Our experience suggests there has been a positive change in all areas in recent years that is driving further ESG integration.

8) How challenging is it for relevant investment entities to integrate the different sustainability factors? (1 is not challenging and 5 is very challenging) - Please refer to the definition in the Glossary).

	1	2	3	4	5	No opinion
Climate factors (<i>these include climate mitigation factors as well as climate resilience factors</i>)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other Environment factors	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Social factors	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Governance factors	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Others	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify others:

Please see response to Question 2.

Please explain:

III. Policy options

9) In which area should relevant investment entities consider sustainability factors within their investment decision-making? Please make a choice and indicate the relevance of the different areas (1 is minor relevance and 5 is very high relevance).

	Yes	No	No opinion
Governance	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Investment strategy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Asset allocation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Risk management	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Others	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

10) Within the area of governance, which arrangements would be most appropriate to enable the integration of sustainability factors? (1 is the not appropriate and 5 is the very appropriate).

	1	2	3	4	5	No opinion
Specific sustainability investment Committee	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Specific sustainability member of the Board	<input type="radio"/>	<input checked="" type="radio"/>				
Sustainability performance as part of remuneration criteria	<input type="radio"/>	<input checked="" type="radio"/>				
Integration of sustainability factors in the investment decision process	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Integration of sustainability checks in the control process	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Periodic reporting to senior management/board	<input type="radio"/>	<input checked="" type="radio"/>				
Others	<input type="radio"/>					

11) Should insurance and pension providers consult their beneficiaries on an annual/periodic basis on their preference as regards sustainability factors?

- Yes
- No
- No opinion

12) Within the portfolio's asset allocation, should relevant investment entities consider sustainability factors even if the consideration of these factors would lead to lower returns to beneficiaries/clients in the medium/short term?

- Yes
- No
- No opinion

13) Within the area of risk management, does the current set of corporate disclosures provide the relevant investment entities with adequate information to perform sustainability risk assessments in respect of investee companies?

- Yes
- No
- No opinion

Please explain where the possible gaps are, if any:

Private company disclosures lag listed companies.
 Long-term ESG scenario planning is not comparable within sectors, especially carbon-related information.

14) Do the overall information or risk metrics available enable the relevant investment entities to adequately perform sustainability risk assessments?

- Yes
- No
- No opinion

Please explain where the possible gaps are, if any:

See response to question 13.

15) Do you think that uniform criteria to perform sustainability risk assessments should be developed at EU level?

- Yes
- No
- No opinion

Please explain:

Every business should provide information relevant to their sector, country of risk and business models.

16) In case material exposure to sustainability factors is identified, what are the most appropriate actions to be performed by the relevant investment entity?

Integration of ESG factors relevant for the investment strategy, including engagement and reporting.

17) Should relevant investment entities disclose how they consider sustainability factors within their investment decision-making?

- Yes
- No
- No opinion

Please explain:

Investors should be expected to disclose how they integrate ESG factors on an annual basis and on their websites. However, there is a risk prescriptive requirements will create a 'generic' approach to ESG disclosure.

If yes, what areas should the disclosure cover? Please make a choice and indicate the relevance of disclosure within the different areas (1 is minor relevance and 5 is high relevance):

	Yes	No	No opinion
Governance	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Investment strategy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Asset allocation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Risk management	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Relevance for governance:

- 1
- 2
- 3
- 4
- 5

Relevance for investment strategy:

- 1
- 2
- 3
- 4
- 5

Relevance for risk management:

- 1
- 2
- 3
- 4
- 5

If yes, where?

	Yes	No	No opinion
Pre-contractual disclosure (e.g. prospectuses)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Semi-annual/annual reports	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Periodic reports	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Website	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Newsletters	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Factsheets	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Marketing materials	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Others	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

IV. Impacts for stakeholders

18) Which stakeholder groups would incur costs and which would benefit from integrating sustainability factors within investment decision-making by relevant investment entities?

	Benefits	Costs
Occupational pension providers	<input type="checkbox"/>	<input type="checkbox"/>
Personal pension providers	<input type="checkbox"/>	<input type="checkbox"/>
Life insurance providers	<input type="checkbox"/>	<input type="checkbox"/>
Non-life insurance providers	<input type="checkbox"/>	<input type="checkbox"/>
Collective investment funds (UCITS, AIF, EuVECA, EuSEF, ELTIF)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Individual portfolio managers	<input checked="" type="checkbox"/>	<input type="checkbox"/>
General public	<input type="checkbox"/>	<input type="checkbox"/>
Retail investors	<input type="checkbox"/>	<input type="checkbox"/>
Financial advisors	<input type="checkbox"/>	<input type="checkbox"/>
Service providers (index provider, research providers...)	<input type="checkbox"/>	<input type="checkbox"/>
Other stakeholders (please specify)	<input type="checkbox"/>	<input type="checkbox"/>

Please explain:

ESG factors can identify potential risks, ensuring a better pricing of capital.

2.2 Questions addressed to end-investors

1) Do you take into account sustainability factors when you choose your investment products or investment entity?

- Yes
- No

2.3 Question specifically addressed to relevant investment entities

1) As a relevant investment entity do you consider sustainability factors?

- Yes
- No

a) In which areas does your entity consider sustainability factors?

	Yes	No
Governance	<input checked="" type="radio"/>	<input type="radio"/>
Investment strategy	<input checked="" type="radio"/>	<input type="radio"/>
Asset allocation	<input checked="" type="radio"/>	<input type="radio"/>
Risk management	<input checked="" type="radio"/>	<input type="radio"/>
Valuation	<input checked="" type="radio"/>	<input type="radio"/>
Disclosure	<input checked="" type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>

Please explain:

The consideration of ESG factors depends on individual investment strategies, clients and internal policies.

b) What kind of sustainability factors do you consider? (Please refer to the definitions provided in the Glossary).

	Yes	No
Climate factors (<i>these include climate mitigation factors as well as climate resilience factors</i>)	<input checked="" type="radio"/>	<input type="radio"/>
Other Environment factors	<input checked="" type="radio"/>	<input type="radio"/>
Social factors	<input checked="" type="radio"/>	<input type="radio"/>
Governance factors	<input checked="" type="radio"/>	<input type="radio"/>
Others	<input type="radio"/>	<input type="radio"/>

Please explain:

Insight considers all factors that may have an impact on short and long-term risk.

c) In case you have products targeting sustainability factors what time horizon do they target? (Several answers possible).

- Short term (up to 3 years)
- Medium term (4 - 9 years)
- Long term (> 10 years)
- Other

d) In your view, what is the relevant time frame within which risks and opportunities related to sustainability factors typically materialize?

	Short term (up to 3 years)	Medium term (4 - 9 years)	Long term (> 10 years)	No opinion
Climate factors (<i>these include climate mitigation factors as well as climate resilience factors</i>)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other environment factors	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Social factors	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Governance factors	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Others	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

e) Within your governance policy, which measures/arrangements do you have in place?

	Yes	No
Specific sustainability investment Committee	<input checked="" type="radio"/>	<input type="radio"/>
Specific sustainability member of the Board	<input type="radio"/>	<input checked="" type="radio"/>
Integration of sustainability factors in the investment decision process	<input checked="" type="radio"/>	<input type="radio"/>
Integration of sustainability checks in the control process	<input checked="" type="radio"/>	<input type="radio"/>
Periodic reporting to senior management/board	<input checked="" type="radio"/>	<input type="radio"/>
Others	<input type="radio"/>	<input type="radio"/>

f) In integrating sustainability factors in your investment decisions, which elements do you consider?

	Yes	No
External sustainability ratings	<input checked="" type="radio"/>	<input type="radio"/>

Internal sustainability ratings	<input checked="" type="radio"/>	<input type="radio"/>
Sustainability benchmarks	<input type="radio"/>	<input checked="" type="radio"/>
Due diligence analysis	<input checked="" type="radio"/>	<input type="radio"/>
Others	<input type="radio"/>	<input type="radio"/>

In case you use external ratings of issuers, please indicate which ones?

MSCI

In case you use internal sustainability ratings, please explain how you get the relevant data?

From companies directly or a review of publicly-available information.

In case you perform a due diligence analyses which elements do you consider?

	Yes	No
Governance arrangements	<input checked="" type="radio"/>	<input type="radio"/>
Commitment of management of the investment target on sustainability factors	<input checked="" type="radio"/>	<input type="radio"/>
Methodologies for the calculation of market and regulatory sustainability risks	<input type="radio"/>	<input checked="" type="radio"/>
Valuation	<input type="radio"/>	<input checked="" type="radio"/>
Quality and frequency of available information	<input checked="" type="radio"/>	<input type="radio"/>
Sustainability risk adjusted performance	<input type="radio"/>	<input checked="" type="radio"/>
Others	<input type="radio"/>	<input type="radio"/>

g) In your risk assessment how do you measure the impact of sustainability risks on your portfolio?

	Yes	No
Internal quantitative model	<input checked="" type="radio"/>	<input type="radio"/>

Third party quantitative model	<input type="radio"/>	<input checked="" type="radio"/>
Qualitative fundamental analysis	<input checked="" type="radio"/>	<input type="radio"/>
Others	<input type="radio"/>	<input type="radio"/>

Please explain:

ESG risks on portfolios are considered using internal models that have been built using ESG data.

h) Do you disclose information on how you integrate sustainability factors in your investment decision making?

- Yes
- No

Please explain:

In full on our website and in an annual report (www.insightinvestment.com/responsible-investment).

If yes, where do you disclose such information?

	Yes	No
Pre-contractual disclosure	<input type="radio"/>	<input type="radio"/>
Semi-annual/annual reports	<input checked="" type="radio"/>	<input type="radio"/>
Periodic reports	<input type="radio"/>	<input type="radio"/>
Website	<input checked="" type="radio"/>	<input type="radio"/>
Newsletters	<input type="radio"/>	<input type="radio"/>
Factsheets	<input type="radio"/>	<input type="radio"/>
Marketing materials	<input checked="" type="radio"/>	<input type="radio"/>
Others	<input checked="" type="radio"/>	<input type="radio"/>

Please specify others:

Webinars and conferences.

i) Do you disclose information on the outcome of sustainability assessments?

- Yes
- No

Please explain:

We provide ESG reporting.

If yes, where do you disclose such information?

	Yes	No
Semi-annual/annual reports	<input type="radio"/>	<input type="radio"/>
Periodic reports	<input type="radio"/>	<input type="radio"/>
Website	<input type="radio"/>	<input type="radio"/>
Newsletters	<input type="radio"/>	<input type="radio"/>
Factsheets	<input type="radio"/>	<input type="radio"/>
Marketing materials	<input type="radio"/>	<input type="radio"/>
Others	<input checked="" type="radio"/>	<input type="radio"/>

Please specify others:

Individual clients only.

j) Do you take into account sustainability factors in your investment decisions due to related national legal requirements or related soft law provisions?

- Yes
- No

k) Do you currently incur the following costs and benefits due to the integration of sustainability factors?

POTENTIAL BENEFITS:

	Yes	No
Ability to attract investors with specific sustainability requirements	<input checked="" type="radio"/>	<input type="radio"/>
Improved financial performance	<input type="radio"/>	<input checked="" type="radio"/>
Reputational benefits/external communication	<input checked="" type="radio"/>	<input type="radio"/>
Internal communication/recruitment	<input checked="" type="radio"/>	<input type="radio"/>
Others	<input type="radio"/>	<input type="radio"/>

Ability to attract investors with specific sustainability requirements - please explain and, when possible, quantify in EUR:

We have won several mandates with ESG approaches.

Reputational benefits/external communication - please explain and, when possible, quantify in EUR:

Clients are interested in our ESG integration activities.

Internal communication/recruitment - please explain and, when possible, quantify in EUR:

Graduates want to work for organisations with strong sustainability performance.

POTENTIAL COSTS:

	Yes	No

Decreased financial performance	<input type="radio"/>	<input checked="" type="radio"/>
Loss of specific financial opportunities (for instance non-sustainable products /projects)	<input type="radio"/>	<input checked="" type="radio"/>
Consultancy costs	<input type="radio"/>	<input checked="" type="radio"/>
Legal counsel costs	<input type="radio"/>	<input checked="" type="radio"/>
Compliance costs	<input type="radio"/>	<input checked="" type="radio"/>
Others	<input type="radio"/>	<input type="radio"/>

2) What would be the level of costs associated with the integration of sustainability factors in investment decision making in the different areas? Please tick the relevant box. (Costs as % of the AUM).

	< 0.5% of the AUM	0.51% to 1% of the AUM	1.01% to 3% of the AUM	3.01% to 5% of the AUM	> 5% of the AUM	No opinion
Governance	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Investment policy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Valuation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Risk management	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Disclosure	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Overall cost	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

3) Please explain whether integration of sustainability factors in any of the above mentioned areas would lead to particularly significant (or potentially disproportionate) impacts in terms of costs or benefits incurred by stakeholders.

If significant exclusion criteria is applied to investment strategies this can lead to reduced performance over time for clients.

4) Do you engage with your clients/beneficiaries as regards their sustainability preference?

- Yes
 No

If so, could you estimate the average costs associated to that engagement in proportion to the assets under management?

- < 0.5% of the AUM

- 0.51% to 1% of the AUM
- 1.01% to 3% of the AUM
- 3.01% to 5% of the AUM
- > 5% of the AUM
- No opinion

5) What could be the benefits associated with the integration of sustainability factors? Please, specify and quantify where possible and relevant.

For clients, ESG factors are an effective way to reduce risk and provide transparency on fund performance.

3. Additional information

Should you wish to provide additional information (e.g. a position paper, report) or raise specific points not covered by the questionnaire, you can upload your additional document(s) here:

Useful links

[More on the Transparency register \(http://ec.europa.eu/transparencyregister/public/homePage.do?locale=en\)](http://ec.europa.eu/transparencyregister/public/homePage.do?locale=en)

[Consultation details \(https://ec.europa.eu/info/consultations/finance-2017-investors-duties-sustainability_en\)](https://ec.europa.eu/info/consultations/finance-2017-investors-duties-sustainability_en)

[Specific privacy statement \(https://ec.europa.eu/info/files/specific-privacy-statement-institutional-investors-and-asset-managers-duties-regarding-sustainability_en\)](https://ec.europa.eu/info/files/specific-privacy-statement-institutional-investors-and-asset-managers-duties-regarding-sustainability_en)

Contact

fisma-investors-duties-sustainability@ec.europa.eu
