

PUBLIC RI REPORT

2021 PILOT

FAMA Investimentos

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.

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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?

FAMA Investimentos is a Brazilian independent equity long only manager, founded in 1993 by Fabio Alperowitch and Mauricio Levi, who have worked together since the inception. It is headquartered in São Paulo, Brazil and manages approximately USD 452M in assets by the end of 2020.

We manage a single strategy with a concentrated portfolio of Brazilian companies listed on local stock exchange (B3), that aims to maximize returns for our investors, delivering significant alpha against the benchmark index and competitors. We employ a fundamental bottom-up approach, that incorporates ESG throughout the investment analysis and decision-making process, which, together with indepth research and long-term guidance are crucial to obtaining compounded gains.

Corporate purpose and culture, governance principles, practices and structure, as well as sustainability strategy and structure are fundamental to our research and analysis process. We understand that good sustainability management and culture, supported by a long-term perspective and ethical principles, contribute to the correct diligence of future risks and returns and allows us to have a portfolio of high-quality companies, that deliver value to all its stakeholders and that are strong enough not just to survive downturn periods but to grow consistently through time.

FAMA uses negative screening as a first step of its ESG incorporation process, followed by integration of ESG qualitative and quantitative data into the analysis and decision-making processes and complemented by constant and coherent stewardship efforts. For us, ESG incorporation represents a very powerful risk control tool which supports our fiduciary duty as asset managers of delivering profitability while controlling/mitigating risks. Ethics is a central pillar for us, and we understand either there is or there is not. We understand companies can present evolutionary issues in several ESG aspects, but, regarding ethics, we do not tolerate deviations of any nature or magnitude. Our understanding of ethics goes beyond the common sense that usually focuses in attempts to obtain financial advantages. In our view, ethics also applies to social and environmental issues

Our investment process heavily relies on qualitative tools and it is supported by quantitative tools. For the qualitative analysis we consider ESG factors collected through direct engagement with the company via site visits and meetings with employees as well as exemployees, competitors, public documents, regulatory questionnaires, government data bases, among others in order to understand management quality and ethical behaviour, transparency, sector drivers, processes, cross-references and other qualitative inputs to support quantitative results. The quantitative decision will be based on valuation models with multiple scenarios, conservative inputs, and Brazilian interest rate plus a risk premium as the cost of opportunity.

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
 - o collaborative engagements
 - attainment of responsible investment certifications and/or awards
- During the year of 2020 we undertook and/or joined several great projects and initiatives.
 - We hired a woman with background on sustainability to complement the investment team's analysis and decision-making process, to increase the stewardship practices and also FAMA's own sustainability agenda and advocacy.

One of our biggest achievements was to be certified as "B Corp" as it is a recognition of our good practices and processes and dedication to responsible investment for almost three decades. With that, we included in our social contract the formal commitment to consider employees, the community and the environment in a binding way in our decision-making processes. We also became signatories of the UN Global Compact, reinforcing our commitment to human rights, care and protection of the environment and ethics and transparency in the conduct of our business.

We published our first carbon footprint report, also the first one in the history of the Brazilian capital market (B3). We found that, considering gross emissions, our portfolio has a carbon footprint 97% lower than that of Ibovespa (the Brazilian stock exchange benchmark); and when considering net emissions (including CO2 sequestration of some companies), our portfolio is positive in carbon; therefore, it sequestrates more carbon than it emits (86,862 tons of CO2 reabsorbed).

In line with our environmental efforts, we founded the "Net Zero Asset Managers" initiative; which is now a group of 73 international asset managers committed to supporting the goal of net zero greenhouse gas emissions by 2050 or sooner, in line with global efforts to limit warming to 1.5 degrees Celsius; and to supporting investing aligned with net zero emissions by 2050 or sooner.

We were also invited to be part of the Informal Working Group of the Taskforce on Nature Related Financial Disclosures (TNFD); which is a group of 74 members among financial institutions and private firms, governments and regulatory/supervisory bodies and think tanks and consortia committed to resolve the reporting, metrics and data needed to create a framework that will enable corporates and financial institutions to assess, manage and report on their dependencies, risks and impacts on nature.

We also developed and launched an academic contest, which aims to stimulate the production of academic research on ESG Investment in Brazil and conduct a large number of engagements with investee companies, covering our entire portfolio and addressing environmental, social, governance and transparency issues. We closed the year with a portfolio of high-quality sustainable companies that contribute fundamentally to six of the UN's Sustainable Development Goals (SDGs).

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?

Our biggest commitment for the coming years is with regard to the goal of reaching net zero greenhouse gas emissions by 2050 or sooner. In order to accomplish that goal we will have to increase our stewardship efforts with our investee companies to ensure there is an appropriate governance, strategy, management and transparency of climate-related issues and that decarbonisation efforts are effective and supported on a scientific basis.

We are also committed to revisit all of our investment processes and tools in order to improve them and keep them in line with the best market practices as well as continuing our advocacy efforts, using our influence and voice through different channels to support the development of the Brazilian responsible investment ecosystem.

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	Laura Vélez
Position	ESG/Sustainability Analyst
Organisation's name	FAMA Investimentos

• This endorsement is for the Senior Leadership Statement only and is not an endorsement of the information reported by FAMA Investimentos in the various modules of the Reporting Framework. The Senior Leadership Statement is simply provided as a general overview of FAMA Investimentos'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

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

o (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\$ 452,000,000.00
(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\$ 0.00

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	οf	AUM
I CI CCIII UGEC	$\mathbf{o}_{\mathbf{I}}$	71011

(A) Listed equity – internal	>75%	
(B) Listed equity – external	0.0%	
(C) Fixed income – internal	0.0%	
(D) Fixed income – external	0.0%	
(E) Private equity – internal	0.0%	
(F) Private equity – external	0.0%	
(G) Real estate – internal	0.0%	
(H) Real estate – external	0.0%	
${\rm (I)\ Infrastructure-internal}$	0.0%	
${\rm (J)\ Infrastructure-external}$	0.0%	
(K) Hedge funds – internal	0.0%	
(L) Hedge funds – external	0.0%	
(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:	0.0%
(R) Other – external, please specify:	0.0%
(S) Off-balance sheet – internal	0-10%
(T) Off-balance sheet – external	0.0%

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

0.0%
0.0%
>75%
0.0%
0.0%

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

Provide a further breakdown of your off-balance sheet assets.

	(1) Money market	(2) Derivatives	(3) Cash, cash equivalents or overlays
(A) Internal allocation	0.0%	0.0%	>75%

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	>75%
(C) A combination of positive/best-in-class and negative screening	0.0%

Stewardship

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?

	$\begin{array}{c} \hbox{(1) Engagement on listed equity} - \\ \hbox{active} \end{array}$	(3) (Proxy) voting on listed equity – active
(A) Through service providers		
(C) Through internal staff	☑	Ø
(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.

	$\begin{array}{c} \hbox{(1) ESG incorporated into investment} \\ \hbox{ decisions} \end{array}$	(2) ESG not incorporated into investment decisions
(C) Listed equity – active – fundamental	•	0
(X) Off-balance sheet	0	•

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 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

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 >75%

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:

0.0%

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?

0.0%

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

(A) Developed	0.0%
(B) Emerging	>75%
(C) Frontier	0.0%
(D) Other	0.0%

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
- o (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
- \square (O) Other responsible investment aspects not listed here, please specify:

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):
 - https://www.famainvestimentos.com.br/esg; https://www.famainvestimentos.com.br/stewardship
- ☑ (B) Guidelines on environmental factors. Add link(s):
- https://www.famainvestimentos.com.br/esg; https://www.famainvestimentos.com.br/stewardship
- ☑ (C) Guidelines on social factors. Add link(s):
- https://www.famainvestimentos.com.br/esg; https://www.famainvestimentos.com.br/stewardship
- ☑ (D) Guidelines on governance factors. Add link(s):
- https://www.famainvestimentos.com.br/esg; https://www.famainvestimentos.com.br/stewardship
- ☑ (E) Approach to stewardship. Add link(s):
 - $https://www.famainvestimentos.com.br/compliance, \ https://www.famainvestimentos.com.br/esg; \ https://www.famainvestimentos.com.br/stewardship$
- ☑ (F) Approach to sustainability outcomes. Add link(s):
- https://www.famainvestimentos.com.br/esg; https://www.famainvestimentos.com.br/stewardship
- ☑ (G) Approach to exclusions. Add link(s):
- https://www.famainvestimentos.com.br/esg; https://www.famainvestimentos.com.br/stewardship
- (H) Asset class-specific guidelines that describe how ESG incorporation is implemented. Add link(s):
- https://www.famainvestimentos.com.br/esg; https://www.famainvestimentos.com.br/stewardship
- ☑ (I) Definition of responsible investment and how it relates to our fiduciary duty. Add link(s):
 - https://www.famainvestimentos.com.br/esg; https://www.famainvestimentos.com.br/stewardship
- ☑ (J) Definition of responsible investment and how it relates to our investment objectives. Add link(s):
- https://www.famainvestimentos.com.br/esg; https://www.famainvestimentos.com.br/stewardship
- ☑ (K) Responsible investment governance structure. Add link(s):
 - https://www.famainvestimentos.com.br/equipe, https://www.famainvestimentos.com.br/esg; https://www.famainvestimentos.com.br/stewardship
- ☑ (L) Internal reporting and verification related to responsible investment. Add link(s):

- $https://www.famainvestimentos.com.br/esg;\ https://www.famainvestimentos.com.br/stewardship. The state of t$
- ☑ (M) External reporting related to responsible investment. Add link(s):

https://www.famainvestimentos.com.br/publicacoes, https://www.famainvestimentos.com.br/esg; https://www.famainvestimentos.com.br/stewardship

(N) Managing conflicts of interest related to responsible investment. Add link(s):

 $https://www.famainvestimentos.com.br/compliance, \ https://www.famainvestimentos.com.br/esg; \ https://www.famainvestimentos.com.br/stewardship$

 \square (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
- o (B) Guidelines on environmental factors
- o (C) Guidelines on social factors
- o (D) Guidelines on governance factors

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)
- \square (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)
- \square (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)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 5	CORE	Multiple, see guidance	N/A	PUBLIC	Responsible investment policy	1

What percentage of your total assets under management are covered by your asset class—specific guidelines that describe how ESG incorporation is implemented?

AUM Coverage:

(A) Listed Equity $$>\!\!75\%$

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?

- \square (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
- $\ensuremath{\square}$ (D) Other chief-level staff, please specify:
- Portfolio Managers
- \square (E) Head of department, please specify department:
- □ (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?

- \square (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
- \square (D) Other chief-level staff [as specified]
- ☐ (E) Head of department [as specified]
- ☑ (F) Portfolio managers
- ☑ (G) Investment analysts
- \square (H) Dedicated responsible investment staff
- ☐ (I) Investor relations
- ☐ (J) External managers or service providers
- \square (K) Other role, please specify:
- \square (L) Other role, please specify:
- \square (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]	(6) Portfolio managers	(7) Investment analysts
(A) Objective for ESG incorporation in investment activities		Ø	Ø	Ø	Ø
(B) Objective for contributing to the development of the organisation's ESG incorporation approach	Ø	Ø	Ø	Ø	Ø

	for contributing to the dation approach	levelopment of the	e organisation's	V		
(2) Chief-level	staff (e.g. Chief Executiv	ve Officer (CEO),	Chief Investmen	roles i	ectives linked to variable on your organisation: or Chief Operating Office	
Which respons	sible investment objective	es are linked to va	riable compensa	tion for roles in	n your organisation?	
ISP 8.2	CORE	ISP 8	N/A	PUBLIC	People and capabilities	General
Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
	l objectives for vestment exist for this					
	ective related to vestment [as specified]					
	ective related to vestment [as specified]					
(D) Objective	for ESG performance					
the organisation activities (e.g. findings from	for contributing to on's stewardship through sharing continuous ESG vestment decisions)		Ø	Ø	☑	Ø

(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	☑
(C) Objective for contributing to the organisation's stewardship activities (e.g. through sharing findings from continuous ESG research or investment decisions)	☑
(4) Other chief-level 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)	
(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)	
(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	V

investment decisions)

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

- o (A) Quarterly or more frequently
- (B) Bi-annually
- o (C) Annually
- o (D) Less frequently than annually
- o (E) On an ad hoc basis
- \circ (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?

- \square (A) We incorporate ESG factors into calculations for expected risks and returns of asset classes
- \square (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
- \square (D) Not applicable, we do not have a strategic asset allocation process

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

For what proportion of assets do you incorporate ESG factors into your strategic asset allocation process?

(A) We incorporate ESG factors into calculations for expected risks and returns of asset classes

(1) for all of our assets

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.

- \square (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
- \square (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

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

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	0	
(B) Maximise overall returns across the portfolio	0	

(C) Maximise overall value to beneficiaries/clients	•	
(D) Contribute to shaping specific sustainability outcomes (i.e. deliver impact)	0	

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	Ø
(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	

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
- \circ (B) We collaborate when our individual stewardship efforts have been unsuccessful or are likely to be unsuccessful, i.e. as an escalation tool
- o (C) We collaborate in situations where doing so would minimise resource cost to our organisation
- o (D) We do not have a default position but collaborate on a case-by-case basis
- o (E) We generally do not join collaborative stewardship efforts

Escalation strategies

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	✓	

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?

- \square (A) We engage with policymakers directly
- \square (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:

FAMA Investimentos signed a letter to the Vice-Presidency of the Republic and the National Council for the Legal Amazon, in defense of the Brazilian sustainable development agenda. In addition to the effective fight against illegal deforestation, the document points out other priority areas for action such as valuing and preserving biodiversity; adoption of carbon credit trading mechanisms and directing financial flows to a circular and low-carbon economy.

FAMA also signed the 2019 and 2020 Global Investor Statement to Governments on Climate Change, together with more than six hundred investors and asset managers representing USD 37 trillion in assets. The statement calls on global leaders to achieve the Paris Climate Agreement's goals, accelerate private sector investment towards a low carbon economy and commit to improve climate-related financial reporting.

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- \square (B) We respond to policy consultations on ESG policy topics. Describe:
- \square (C) We provide technical input on ESG policy change. Describe:
- \square (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:

Public statements through FAMA channels or other external media, engaging in public debate through interviews, webinars, conferences and other events

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:

We value people who, in addition to the necessary technical attributes, have their work guided by ethical principles, which are nonnegotiable in the conduct of our activities. In this context, for an assertive selection process and in line with our values, in addition to technical evaluation, we have the support of an external consultancy that performs specific analysis related to ethics. Tests present everyday situations so that the candidate chooses the best option, according to his / her own worldview. The results are used as input to assess adherence to our principles and practices. By having and ethical team, we ensure issues that are potentially not included in any policy, are handled in the best possible way. As soon as a new member joins the company, the Compliance and Risks team has the duty to show all the applicable policies to the new member and be available in case of doubts or comments. If a policy is updated, it is responsibility of the Compliance and Risks team to communicate to the entire company. The investment process at FAMA is designed in a way so that there is constant communication and open discussions among the investment team. Two weekly investment meetings as well as systematic handle of the information serve as checking points and tools to assure ESG issues, including engagement with policy makers, are being handled appropriately and consistently with FAMA's Responsible Investment and Stewardship policy. The portfolio managers, who are also FAMA Investimentos' founders, have a deep understanding and genuine interest in ESG, and this allows them to be guarantors that ESG issues are intrinsically integrated and well managed throughout the investment process and that they are consistent with FAMA's Responsible Investment policy. Analysts integrate ESG topics since the start of the research process (as well as monitoring) and one analyst in the team focuses on ESG topics horizontally. FAMA analyses the possibilities to engage with policymakers on a case-by-case basis in order to understand not just the main goal of the engagement but also FAMA's main role and responsibilities as well as its capacity to generate any positive outcome through its participation.

o (B) No, we do not have these governance processes in place. Please explain why not:

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?

FAMA recognises the importance of engaging with policy makers and regulators to ensure policy frameworks that support responsible investment.

FAMA understands there are several direct and indirect ways of exercicing political influence aligned with sustainable finance such as through public statements be it on FAMA channels or other external media, private and public debates, interviews, webinars, conferences and other events, as well as through third-party organizations.

Specifically with regards to third-party organizations, because constantly are emerging initiatives to engage with policy makers on a variety of ESG issues, including industry groups, letters to sign and public consultations, FAMA, before joining or supporting any of them, looks to find out which institution leads the initiative, what its main objective is and understand if it is consistent with FAMA's own principles and responsible investment strategy and policies. Priorities are given to strategies that directly or indirectly impact FAMA's portfolio or which we consider to be extremely important due to the macroeconomic scenario. Several factors are considered when choosing to join / support an initiative, including the availability of internal resources and the ability to contribute to the cause, as well as the seriousness of the commitments made and contribution to our outlined objectives.

Similar criteria is applied with regards to own statements and participation on any webinar or event. We look to share with the public our opinion with regards to matters of own interest as well as national and international interest such as climate change, Brazilian carbon market, illegal deforestation, violation of human rights, appropriate governance structures and Brazilian specificities, among others. We also look to participate at events where we recognise our voice will have an impact and we will have the opportunity to discuss issues not discussed so much before or that we consider we can add some value.

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

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

Is your policy that ensures alignment between your political influence and your position on sustainable finance publicly disclosed?

- o (B) No, we do not publicly disclose this policy(ies)

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):
 - https://www.famainvestimentos.com.br/publicacoes
- ☑ (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):
 - $https://www.linkedin.com/posts/fama-investimentos_cebdsorg-comunicado-do-setor-empresarial-brasileiro-activity-6689302318963408897-EuMm$
- □ (C) No, we did not publicly disclose our policy engagements activities during the reporting year. Explain why:
- \Box (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://www.netzeroassetmanagers.org/leading-asset-managers-commit-to-net-zero-emissions-goal-with-launch-of-global-initiative and the state of th
- o (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)?

- https://www.fsb-tcfd.org/supporters/
- o (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:

As an important step of our investment analysis and decision-making process, the investment team, specifically the equity analyst completes a SWOT analysis that intrinsically includes ESG issues. This matrix that is built based on deep qualitative and quantitative research of the company, as well as its sector and market, allows a better view of the risks and opportunities and to understand whether the company is prepared or not to mitigate or assume them, respectively. Evidently, climate-related information is a relevant part of the analysis. These findings as well as any other relevant input or update is shared by the equity analyst with the entire investment team included the supervisory board or portfolio managers as we called them, on a weekly investment committee. It is responsibility of the equity analyst to put everyone in context and share his/her opinion on the action to be implemented; however, it is up to the portfolio managers to make the final decision.

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

In 2020 an ESG analyst joined the team to support the investment process by deepening on specific ESG issues. The process of including ESG factors is intrinsic to the investment process and is carried out both by investment analysts and portfolio managers who analyze ESG issues and integrate their findings into the overall investment analysis and decision-making. The ESG analyst participates in every weekly meeting and company-specific meetings. At the end, all those involved in the analysis and investment process have a complete grasp of all aspects of any given company in an integrated, unsegmented way. FAMA's analysts are in charge of the holistic analysis of a company, given that finance, ESG, ethics and corporate culture are clearly integrated.

- □ (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:

FAMA has been very vocal about its support for the goal of net zero greenhouse gas emissions in accordance to the article 6 of the Paris Agreement and the importance of considering climate change as an integral part of a company's risk management as well as an essential part of a company's investment valuation process. Its stand is broadly share with the public through several official documents as well as through public statements, commentaries, webinars, conferences, among others. Our commitment with the Net Zero Asset Managers Initiative demonstrate how relevant and serious climate change is for us.

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

FAMA has been monitoring its portfolio carbon intensity over the last years and in 2020 published its first carbon footprint report, the very first of its type in the Brazilian stock exchange. Interestingly we found that, when considering gross emissions, our portfolio has a carbon footprint 97% lower than that of Ibovespa – main Brazilian stock exchange index; and when considering net emissions (including the CO2 sequestration of some companies), our portfolio is positive in carbon - so it sequestrates more carbon than it emits (86,862 tons of CO2 reabsorbed). In addition, as one of the founding members of the Net Zero Asset Managers Initiative, FAMA will start to formally monitor progress on climate-related metrics and targets of its investee companies in order to comply with its commitment to reach zero emissions by 2050 or sooner.

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

As an asset manager, FAMA assumes a fiduciary duty to deliver profitability while controlling/mitigating risks. Not only do we believe that reporting on the greenhouse gas emissions of invested companies is essential, but also to incorporate climate risks in the ESG integration process when constructing the portfolio. It is very clear for us, and we share this vision with our investee companies, that climate change poses significant transition, physical and systemic risks for companies and that they need to be prepared to mitigate them as well as to assume the opportunities that a low-carbon economy presents.

- \square (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:

As an important step of our investment analysis and decision-making process, the investment team, specifically the equity analyst completes a SWOT analysis that intrinsically includes ESG issues. This matrix that is built based on a deep qualitative and quantitative research of the company, as well as its sector and market, allows a better view of the risks and opportunities and to understand whether the company is prepared or not to mitigate or assume them, respectively. Evidently, climate-related information is a relevant part of the analysis

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

The findings, as well as any other relevant input or update are shared by the equity analyst with the entire investment team included the supervisory board or portfolio managers as we called them, on a weekly investment committee. It is responsibility of the equity analyst to put everyone in context and to share his/her opinion on the action to be implemented; however, it is up to the portfolio managers to make the final decision, based on the comments and information gathered. After consensus on the action to be implemented, it is responsibility of the equity analyst monitor progress and to keep updated the investment team on any relevant result or progress. It is responsibility of the equity analyst and portfolio managers to engage with the company in order to understand if the risks have been identified, what are the controls in place and initiatives to address such risks and eventual opportunities

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

An engagement plan is constructed after the SWOT analysis is completed. If a climate-related risk is considered of high priority because of its probability, impact, materiality for the company and other variables, then it will be part of the engagement plan. With the plan it is expected to have a course of action with the investee company and to serve as a monitoring tool.

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

It is responsibility of the equity analyst to inform any resource needed to complete the analysis, monitoring and report of climate-related risks and any other risk. The equity analyst can inform the resources needed via e-mail, call, videocall or any other channel and directly to the portfolio managers or at the weekly investment meetings

□ (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)?

- \square (A) Specific financial risks in different asset classes. Specify:
- ☑ (B) Specific sectors and/or assets that are at risk of being stranded. Specify:

Currently we do not invest in companies from the Oil&Gas sector because we identify higher climate-related risks and we do not see any Brazilian company in this sector moving towards the right direction, with a clear decarbonization strategy.

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

We identified some companies in our portfolio that are most exposed to direct physical climate risks, including those that are part of the Food, Beverage and Tobacco and Consumer Durables & Apparel industries, being directly and mainly impacted by the lack of water for production and manufacture, for example. Two companies in the Capital Goods industry in our portfolio can also be directly impacted by a reduction in productivity due to small temperature differences that impact the works or heavy rains delaying the works or damaging structures

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

All our assets are exposed to indirect physical climate risks, some of them to a greater and others to a lower extent. Complementing the examples brought before, we have identified for the Food, Beverage and Tobacco industry company a risk of higher wheat prices, the company's main input, because of longer dry seasons, floods, heavy rain, interruptions on distribution because of extreme weather, etc. Similarly, two companies from the Consumer Durables & Apparel industries are exposed to higher prices of its main inputs such as wool or cotton.

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

The sectors that can benefit in different climatic scenarios are mainly those vital to face climate change, such as renewable energy, broadband, electric vehicles, housing and construction, among others. Specifically from our portfolio, we see better opportunities for a car rental company that we have in our portfolio, since electric vehicles will have lower costs and, therefore, the company's fleet may have a lower environmental impact. Good opportunities are also mapped for two companies in the construction sector, as the demand for safer, more resilient and sustainable housing has increased with the pandemic

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

Specifically, two companies in the Materials industry contribute positively to our carbon footprint because they reabsorb more emissions than they emit, mainly because of their reforestation projects. In the past 16 years, one of them, for example, has reduced greenhouse gas emissions by more than 60% - adding direct emissions and those related to the purchase of energy. Currently, 89.5% of the energy consumed by the company is from renewable sources, with emphasis on the use of biomass.

\Box	(C)	Othor	climate-related	riele	and	opportunities	identified	Specifyre
_ '	α_{I}	Other	CIIIIIate-Telateu	1 ISKS	anu	opportunities	identined.	ppechy.

□ (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]			Ø		
(C) Assets with exposure to direct physical climate risk [as specified]				V	
(D) Assets with exposure to indirect physical climate risk [as specified]				Ø	
(E) Specific sectors and/or assets that are likely to benefit under a range of climate scenarios [as specified]				Ø	
(F) Specific sectors and/or assets that contribute significantly to achieving our climate goals [as specified]				Ø	
	(5) 11–20 years	(6) 21–3	0 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]					

Indicator Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
(F) Specific sectors and/or assets that contribute significantly to achieving our climate goals [as specified]					
(E) Specific sectors and/or assets that are likely to benefit under a range of climate scenarios [as specified]					
(D) Assets with exposure to indirect physical climate risk [as specified]					

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:

CORE

ISP 31

For FAMA, Investment analysis and decision-making is long-term driven. Most of our companies are part of our portfolio for more than five years, and this confirms our investment thesis as they prove to be good quality companies with a clear evolution over time. This long-term emphasis applies also to our analysis of climate-related risks and opportunities and its related financial impacts. We analyse them independently of our investment time horizon

N/A

PUBLIC

Strategy

General

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

N/A

For FAMA, Investment analysis and decision-making is long-term driven. Most of our companies are part of our portfolio for more than five years, and this confirms our investment thesis as they prove to be good quality companies with a clear evolution over time. This long-term emphasis applies also to our analysis of climate-related risks and opportunities and its related financial impacts. We analyse them independently of our investment time horizon

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

For FAMA, Investment analysis and decision-making is long-term driven. Most of our companies are part of our portfolio for more than five years, and this confirms our investment thesis as they prove to be good quality companies with a clear evolution over time. This long-term emphasis applies also to our analysis of climate-related risks and opportunities and its related financial impacts. We analyse them independently of our investment time horizon

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

For FAMA, Investment analysis and decision-making is long-term driven. Most of our companies are part of our portfolio for more than five years, and this confirms our investment thesis as they prove to be good quality companies with a clear evolution over time. This long-term emphasis applies also to our analysis of climate-related risks and opportunities and its related financial impacts. We analyse them independently of our investment time horizon

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

For FAMA, Investment analysis and decision-making is long-term driven. Most of our companies are part of our portfolio for more than five years, and this confirms our investment thesis as they prove to be good quality companies with a clear evolution over time. This long-term emphasis applies also to our analysis of climate-related risks and opportunities and its related financial impacts. We analyse them independently of our investment time horizon

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

For FAMA, Investment analysis and decision-making is long-term driven. Most of our companies are part of our portfolio for more than five years, and this confirms our investment thesis as they prove to be good quality companies with a clear evolution over time. This long-term emphasis applies also to our analysis of climate-related risks and opportunities and its related financial impacts. We analyse them independently of our investment time horizon

- □ (G) Other climate-related risks and opportunities identified, please specify:
- □ (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.

- \Box (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
- \square (D) Other climate scenario, specify:
- ☑ (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
- \square (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
- \square (D) The OECD Guidelines for Multinational Enterprises, including guidance on Responsible Business Conduct for Institutional Investors
- \square (E) Other frameworks, please specify:
- \square (F) Other frameworks, please specify:

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.

- $\ oxdots$ (A) The UN Sustainable Development Goals (SDGs) and targets
- (B) The Paris Agreement
- ☐ (C) The UN Guiding Principles on Business and Human Rights (UNGPs)
- \square (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:
- \square (G) Other framework/tool, please specify:
- ☐ (H) Other framework/tool, please specify:
- \square (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?

\Box	(A)	At.	the	asset	level
_ '	(1 L)	1 110	UIIC	associ	ICVCI

 \square (B) At the economic activity level

(C) At the company level

(D) At the sector level

☐ (E) At the country/region level

 \square (F) At the global level

 \square (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?

\square	(A)	Identifying	sustainability	outcomes th	hat are	closely linked	to our co	re investment	activities
⊻	(A)	таентнуше	sustamadmiv	ourcomes u	пат аге с	hoserv mikeu	to our co	ге шуезтшент	activities

- \square (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)
- \square (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
- \square (H) Other method, please specify:
- \square (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
- \square (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)
- \square (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
- \square (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.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
- \square (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

 \square (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
- \Box (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?

- \square (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
- \square (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
- \square (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
- \square (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)
- \square (H) We conducted an external ESG audit of our holdings as part of risk management, engagement identification or investment decision-making
- \square (I) Responses related to our RI practices documented in this report have been internally reviewed before submission to the PRI
- \square (J) None of the above

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	(4) report not reviewed

(D) Other chief-level staff, please specify: .	(4) report not reviewed
(E) Head of department, please specify: .	(4) report not reviewed
(F) Compliance/risk management team	(1) the entire report
(G) Legal team	(4) report not reviewed
(H) RI/ ESG team	(1) the entire report
(I) Investment teams	(1) the entire report

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?

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

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?

	(3) Active - Fundamental
(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?

(3) Active – fundamental

(A) We monitor long-term ESG trends for all assets		
(B) We monitor long-term ESG trends for the majority of assets	0	
(C) We monitor long-term ESG trends for a minority of assets	0	
(D) We do not continuously monitor long-term ESG trends in our investment process	0	

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?

(3) Active – fundamental

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

(3) Active - Fundamental

(A) We incorporate governance-related risks into financial modelling and equity valuations	(1) in all cases
(B) We incorporate environmental and social risks into financial modelling and equity valuations	(1) in all cases
(C) We incorporate environmental and social risks related to companies' supply chains into financial modelling and equity valuations	(1) in all 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?

	$(3) \ {\rm Active-fundamental}$
(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	\square
(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	${ m LE}~4$	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?

(3) Active - fundamental

(A) We incorporate information on current performance across a range of ESG metrics	(1) in all cases
(B) We incorporate information on historical performance across a range of ESG metrics	(1) in all cases
(C) We incorporate information enabling performance comparison within a selected peer group across a range of ESG metrics	(1) in all cases
(D) We incorporate information on ESG metrics that may impact or influence future corporate revenues and/or profitability	(1) in all cases

ESG incorporation in portfolio construction

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?

(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		

Please specify for "(E) Other expressions of conviction".

The negative screening process of individual assets within our portfolio is influenced by 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?

(3) Active - fundamental

(A) The selection of individual assets within our portfolio is influenced by ESG factors	(1) in all cases
(B) The holding period of individual assets within our portfolio is influenced by ESG factors	(1) in all cases

(C) The portfolio weighting of individual assets within our portfolio or benchmark is influenced by ESG factors	(1) in all cases
(E) Other expressions of conviction	(1) in all cases

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?

- \square (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
- \square (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
- \square (D) Other, please specify:

The investment team has weekly meetings to discuss various issues, including any changes in the composition of the portfolio. The new companies undergo an in-depth analysis and research that serve, among other things, to ensure that they are in compliance with all the criteria that FAMA has established

□ (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? (3) Active - fundamental (A) Our regular reviews include quantitative information on \checkmark material ESG risks specific to individual listed equities (B) Our regular reviews include aggregated quantitative information \checkmark 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?

	(3) Active – fundamental
(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	0
(C) Yes, we have a formal process in place for regularly identifying and incorporating ESG incidents into a minority of our investment decisions	0
(D) Yes, we have an ad hoc process in place for identifying and incorporating ESG incidents	0
(E) Other	0
(F) We currently do not have a process in place for regularly identifying and incorporating ESG incidents into our investment decision-making	0

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	•	0	0	0
(B) We publish any changes in ESG screens and share them on a publicly accessible platform such as a website or through fund documentation	•	0	0	0
(C) We outline any implications of ESG screens, such as deviation from a benchmark or impact on sector weightings, to clients and/or beneficiaries	•	٥	0	0

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?

(3) Active - fundamental

(A) Our regular stakeholder reporting includes qualitative examples of engagement and/or ESG incorporation	1) In all of our regular stakeholder reporting
(B) Our regular stakeholder reporting includes quantitative ESG engagement data	1) In all of our regular stakeholder reporting
(C) Our regular stakeholder reporting includes quantitative ESG incorporation data	1) In all 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.)

- o (B) Yes, we have a (proxy) voting policy, but it is not publicly available
- o (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:

Our policy is in accordance with the ANBIMA Code of Regulation and Best Practices. All voting matters, including ESG topics, are discussed in advance at weekly investment meetings; however, we believe it is more effective to engage with companies to address specific issues, rather than just voting at shareholders' meetings, partly because many Brazilian companies have a controlling shareholder and therefore activism via voting has limited effectiveness

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

Our policy is in accordance with the ANBIMA Code of Regulation and Best Practices. All voting matters, including ESG topics, are discussed in advance at weekly investment meetings; however, we believe it is more effective to engage with companies to address specific issues, rather than just voting at shareholders' meetings, partly because many Brazilian companies have a controlling shareholder and therefore activism via voting has limited effectiveness

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

Our policy is in accordance with the ANBIMA Code of Regulation and Best Practices. All voting matters, including ESG topics, are discussed in advance at weekly investment meetings; however, we believe it is more effective to engage with companies to address specific issues, rather than just voting at shareholders' meetings, partly because many Brazilian companies have a controlling shareholder and therefore activism via voting has limited effectiveness

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

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.)

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

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
- \circ (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
- o (D) In the majority of cases, we support the recommendations of investee company management by default
- o (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?

- \square (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:
- \square (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:

 $https://927ae365-d5b4-4f2b-a6ba-28eca660d344. filesusr.com/ugd/610c4d \\ \ \ c067ebb83fef4b8eae8484bf9fc70e1a.pdf$

- o (B) Yes, for the majority of (proxy) votes Link:
- \circ (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:
- \circ (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?

- o (A) Within one month of the AGM/EGM
- o (B) Within three months of the AGM/EGM
- o (C) Within six months of the AGM/EGM
- (D) Within one year of the AGM/EGM
- \circ (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
- \square (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	recommendati	ons or	abstained,	the
rati	ona	le wa	s provi	ded	priva	tely to t	the company				

(2) 11-50%

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?

- \square (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