




Gateway		Reason for Interaction
<b>Monetary</b> <b>LEA 02</b>	<b>Discipline</b> <b>Monetary</b>	<input checked="" type="checkbox"/> To support investment decisionmaking in & company material ESG issues <input checked="" type="checkbox"/> To encourage corporate transition or identify the need to divest <input checked="" type="checkbox"/> Other: specify
<b>Type of engagement</b> Individual/ internal staff engagements		<input checked="" type="checkbox"/> To support investment decisionmaking in & company material ESG issues <input checked="" type="checkbox"/> To encourage corporate transition or identify the need to divest <input checked="" type="checkbox"/> Other: specify
Collaborative engagements		<input checked="" type="checkbox"/> To support investment decisionmaking in & company material ESG issues <input checked="" type="checkbox"/> To encourage corporate transition or identify the need to divest <input checked="" type="checkbox"/> Other: specify
Service provider engagements		<input checked="" type="checkbox"/> To support investment decisionmaking in & company material ESG issues <input checked="" type="checkbox"/> To encourage corporate transition or identify the need to divest <input checked="" type="checkbox"/> Other: specify

# RI TRANSPARENCY REPORT

2020

Boston Partners Global Investors, Inc.

## About this report

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

This report is an export of the individual Signatory organisation's response to the PRI during the reporting period specified above. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information.

## PRI disclaimer

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

## Usage restrictions

Public Transparency Reports are the intellectual property of PRI. Under no circumstances, can this report or any of its contents be sold to third parties.

OO 01.1 Select the services and funds you offer

Select the services and funds you offer	% of asset under management (AUM) in ranges
Fund management	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50%
Fund of funds, manager of managers, sub-advised products	<input checked="" type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
Other	<input checked="" type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
Total 100%	

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

- Hedge funds
- Fund of hedge funds

OO 02.1 Select the location of your organisation's headquarters.

United States

OO 02.2 Indicate the number of countries in which you have offices (including your headquarters).

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

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

160

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

- Yes
- No

OO 03.3 Additional information. [Optional]

Boston Partners Global Investors, Robeco, and RobecoSAM AG are all subsidiaries of ORIX Corporation

OO 04.1 Indicate the year end date for your reporting year.

31/12/2019

OO 04.2 Indicate your total AUM at the end of your reporting year.

Total AUM  
 89,367,957,602 USD  
 89367957602 USD

OO 04.4 Indicate the assets which are subject to an execution and/or advisory approach. Provide this figure based on the end of your reporting year

- Not applicable as we do not have any assets under execution and/or advisory approach

**OO 05.1** Provide an approximate percentage breakdown of your AUM at the end of your reporting year using the following asset classes and investment strategies:

	Internally managed (%)	Externally managed (%)
Listed equity	100	0
Fixed income	0	0
Private equity	0	0
Property	0	0
Infrastructure	0	0
Commodities	0	0
Hedge funds	0	0
Fund of hedge funds	0	0
Forestry	0	0
Farmland	0	0
Inclusive finance	0	0
Cash	0	0
Money market instruments	0	0
Other (1), specify	0	0
Other (2), specify	0	0

**OO 06** Mandatory Descriptive General

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

- as percentage breakdown
- as broad ranges

**OO 06.3** Indicate whether your organisation has any off-balance sheet assets [Optional].

- Yes
- No

**OO 06.5** Indicate whether your organisation uses fiduciary managers.

- Yes, we use a fiduciary manager and our response to OO 5.1 is reflective of their management of our assets.
- No, we do not use fiduciary managers.

**OO 09** Mandatory Peering General

**OO 09.1** Indicate the breakdown of your organisation's AUM by market.



**OO 10** Mandatory Gateway General

**OO 10.1** Select the active ownership activities your organisation implemented in the reporting year.

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

Listed equity – voting	
<input checked="" type="checkbox"/>	We cast our (proxy) votes directly or via dedicated voting providers
<input type="checkbox"/>	We do not cast our (proxy) votes directly and do not require external managers to vote on our behalf

OO 11	Mandatory	Gateway	General
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OO 11.1	Select the internally managed asset classes in which you addressed ESG incorporation into your investment decisions and/or your active ownership practices (during the reporting year).
Listed equity	
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.

OO 12	Mandatory	Gateway	General
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OO 12.1	Below are all applicable modules or sections you may report on. Those which are mandatory to report (asset classes representing 10% or more of your AUM) are already ticked and read-only. Those which are voluntary to report on can be opted into by ticking the box.
Core modules	
<input checked="" type="checkbox"/>	Organisational Overview
<input checked="" type="checkbox"/>	Strategy and Governance
RI implementation directly or via service providers	
Direct - Listed Equity incorporation	
<input checked="" type="checkbox"/>	Listed Equity incorporation
Direct - Listed Equity active ownership	
<input checked="" type="checkbox"/>	Engagements
<input checked="" type="checkbox"/>	(Proxy) voting
Closing module	
<input checked="" type="checkbox"/>	Closing module

OO LE 01	Mandatory to Report, Voluntary to Disclose	Gateway	General
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OO LE 01.1	Provide a breakdown of your internally managed listed equities by passive, active - quantitative (quant), active - fundamental and active - other strategies.
0	Passive
0	Active - quantitative (quant)
100	Active - fundamental and active - other

OO Checks			Checks
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If there are any messages below, please review them before continuing. If there are no messages below, please save this page and continue.

**SG 01.1** Indicate if you have an investment policy that covers your responsible investment approach.

Yes

**SG 01.2** Indicate the components/types and coverage of your policy.

Policy components/types	Coverage by AUM
<input checked="" type="checkbox"/> Policy setting out your overall approach <input type="checkbox"/> Formalised guidelines on environmental factors <input type="checkbox"/> Formalised guidelines on social factors <input type="checkbox"/> Formalised guidelines on corporate governance factors <input type="checkbox"/> Fiduciary (or equivalent) duties <input type="checkbox"/> Asset class-specific RI guidelines <input type="checkbox"/> Sector specific RI guidelines <input type="checkbox"/> Screening / exclusions policy <input type="checkbox"/> Other, specify (1) <input type="checkbox"/> Other, specify(2)	<input checked="" type="checkbox"/> Applicable policies cover all AUM <input type="checkbox"/> Applicable policies cover a majority of AUM <input type="checkbox"/> Applicable policies cover a minority of AUM

**SG 01.3** Indicate if the investment policy covers any of the following

- Your organisation’s definition of ESG and/or responsible investment and it’s relation to investments
- Your investment objectives that take ESG factors/real economy influence into account
- Time horizon of your investment
- Governance structure of organisational ESG responsibilities
- ESG incorporation approaches
- Active ownership approaches
- Reporting
- Climate change
- Understanding and incorporating client / beneficiary sustainability preferences
- Other RI considerations, specify (1)
- Other RI considerations, specify (2)

**SG 01.4** Describe your organisation’s investment principles and overall investment strategy, interpretation of fiduciary (or equivalent) duties, and how they consider ESG factors and real economy impact.

Boston Partners has a two step investment process. The first step is a quantitative ranking of the investment universe based on valuation, momentum and fundamental factors which includes certain ESG considerations. The second step is a fundamental review by the research team looking at valuation, momentum and fundamental criteria, including ESG information. The research team uses source documents and management meetings to identify an investment catalyst and determine an appropriate valuation. Each recommendation is communicated to portfolio managers for consideration for client portfolios. ESG information is provided to the fundamental analyst team by the Sustainability and Engagement team in addition to any ESG information generated by the fundamental analyst.

**SG 01.5** Provide a brief description of the key elements, any variations or exceptions to your investment policy that covers your responsible investment approach. [Optional]

Boston Partners is a signatory to the United Nations Principles for Responsible Investment. Boston Partners’ investment process has always stressed investment in companies with good fundamental characteristics, including sustainability, environmental, social and governance factors.

Quantitative Screening:

The initial step in the investment process is a quantitative screening of the investment universe based on a number of factors. Inputs to our scoring models include certain ESG/Sustainability considerations. Proprietary ESG/Sustainability considerations include:

Capital Acquisition and Efficiency which tries to capture the degree to which the company sustainably manages resource utilization and supply chain management;

Management Signaling which indicates governance practices surrounding disclosure, stakeholder engagement and shareholder welfare; and Sustainable Growth which measure how efficiently management uses internal resources to minimize its environmental footprint and reduce dependence on and absorption of external resources.

Fundamental Research/Engagement and Sustainability Team.

The next step in the investment process is an in-depth review by the fundamental analyst team of each of the companies generated by the quantitative screening process. From various sources, the fundamental analysts have ESG research available to them to consider as part of their research process. In addition, the Engagement and Sustainability Team provides to the fundamental analyst team an in-depth review of the ESG/Sustainability issues for those companies that have adverse scores on various ESG/Sustainability metrics as produced by several well-known organizations including Robeco SAM AG, Boston Partners affiliate and a leader in the ESG/Sustainability field. The fundamental analyst team considers the information produced by the ESG/Sustainability team in determining their recommendation on a company and uses such information for further dialogue with the company’s representatives at investor meetings.

The goal of ESG research at Boston Partners is to ensure that issuers in which client portfolios are invested do not engage in conduct that a reasonable person would consider unethical, environmentally harmful or materially contrary to the interests of shareholders.

We undertake original research into issuers looking at issuer documents such as the annual report and corporate responsibility report and any other disclosures as well as an extensive search for any reports or stories about the issuer regarding anything ESG related, for example, any fines or litigation imposed within the preceding few years. Ultimately, we want to see companies have the following:

Corporate Responsibility Report. The issuer should have an annual corporate responsibility report that meets a recognized reporting format,

preferably the G-4 guidelines. The report should address the following: a. climate change policy; b. greenhouse gas emissions reduction policy and disclosure of GHG emissions measurement; c. corporate governance; d. supply chain management.

Supply Chain Management Policy. The issuer should have a policy on supply chain management that requires each supplier to adhere to certain standards including no child or forced labor; environmental preservation; reasonable work hours; product quality/product contamination; conflict minerals. The supply chain management policy should include some type of periodic audit of the suppliers for compliance with the terms imposed on the suppliers by the policy.

Carbon Disclosure Project. The issuer should be a participant in the carbon disclosure project, disclosing its carbon usage in accordance with the CDP requirements.

Corporate Governance. The issuer should have a code of ethics addressing issues such as bribery and relations with governmental clients and other conflicts of interest. The issuer should also have an independent chairman and should provide shareholders with the right to call special meetings or to act by consent based upon the request of 10% of the shareholders.

Absence of litigation/regulatory actions. The issuer should not be subject to any material litigation involving any of the ESG considerations currently or within the last 3 years and the issuer should not have been subject to any material fines or other regulatory proceedings within the past 3 years.

An issuer's failure to have any of the 5 items will not necessarily result in a negative recommendation; however, such failure would be the basis for a recommendation for improvement that generally would be conveyed to the issuer.

#### Engagement

In addition to the dialogue between the fundamental analyst team and the companies as described above, the Engagement and Sustainability Team will work with the fundamental analysts to correspond formally with companies regarding ESG/Sustainability issues that Boston Partners believes are important to our clients. Boston Partners votes proxies for most of its clients and incorporates an ESG/Sustainability consideration into its proxy decisions. In addition, Boston Partners will address directly with company management Boston Partners' views on proxy issues where Boston Partners does not support a management position as well as on other ESG matters where Boston Partners considers the issuer deficient.

#### Best Interests of Our Clients.

Every part of our investment process, including ESG/Sustainability considerations, is executed solely in the best interests of our clients.

No

SG 01 CC	Mandatory to Report, Voluntary to Disclose	Descriptive	General
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**SG 01.6 CC** Indicate whether your organisation has identified transition and physical climate-related risks and opportunities and factored this into the investment strategies and products, within the organisation's investment time horizon.

Yes

**Describe the identified transition and physical climate-related risks and opportunities and how they have been factored into the investment strategies/products.**

Climate change risks and opportunities are industry/issuer specific and are considered as part of the sustainability research provided by the Sustainability Team to the fundamental analyst team and independently by the analysts directly when those risks are material to an investment decision.

No

**SG 01.7 CC** Indicate whether the organisation has assessed the likelihood and impact of these climate risks?

Yes

**Describe the associated timescales linked to these risks and opportunities.**

these timescales are industry/issuer specific. Climate change risks are typically expected to affect investments long after the projected holding period of an issuer by Boston Partners except for insurance which is dealing with changing weather patterns currently and fossil fuel producers and dependents such as airlines and car manufactureres which are affected by regulatory changes which may be current. .

No

**SG 01.8 CC** Indicate whether the organisation publicly supports the TCFD?

Yes

No

**SG 01.9 CC** Indicate whether there is an organisation-wide strategy in place to identify and manage material climate-related risks and opportunities.

Yes

**Describe**

As of year-end 2019, we conduct a quarterly Climate Impact Assessment through ISS ESG for each investment product/strategy. On an ongoing basis, the Sustainability and Engagement Team considers climate-related risks as part of its analysis of an issuer, including the way and the extent that the issuer is incorporating climate change into its operations/products/outlook.

No

**SG 1.10 CC** Indicate the documents and/or communications the organisation uses to publish TCFD disclosures.

- Public PRI Climate Transparency Report
- Annual financial filings
- Regular client reporting
- Member communications
- Other
- We currently do not publish TCFD disclosures

SG 02.1	Indicate which of your investment policy documents (if any) are publicly available. Provide a URL and an attachment of the document.
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Policy setting out your overall approach

URL/Attachment
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URL

<https://www.boston-partners.com/wp-content/uploads/2018/08/esg-policy.pdf>

Attachment (will be made public)

Files: link

Engagement policy

(Proxy) voting policy

URL/Attachment
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URL

<https://www.boston-partners.com/wp-content/uploads/2019/06/final-2019-proxy-voting-policy-5.16.19.pdf>

Attachment (will be made public)

We do not publicly disclose our investment policy documents

SG 02.2	Indicate if any of your investment policy components are publicly available. Provide URL and an attachment of the document.
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Your organisation's definition of ESG and/or responsible investment and it's relation to investments

URL/Attachment
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URL

<https://www.boston-partners.com/wp-content/uploads/2018/08/ESG-Policy.pdf>

Attachment

Governance structure of organisational ESG responsibilities

URL/Attachment
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URL

<https://www.boston-partners.com/about-us/esg-investment-team/>

Attachment

ESG incorporation approaches

URL/Attachment
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URL

<https://www.boston-partners.com/wp-content/uploads/2018/08/ESG-Policy.pdf>

Attachment

Active ownership approaches

URL/Attachment
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URL

<https://www.boston-partners.com/wp-content/uploads/2018/08/ESG-Policy.pdf>

Attachment

We do not publicly disclose any investment policy components

SG 03.1	Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.
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Yes

SG 03.2	Describe your policy on managing potential conflicts of interest in the investment process.
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Potential conflicts may arise from the side-by-side management of registered investment companies and "investment accounts," which include privately offered funds and separately managed accounts of individuals and institutional investors. Boston Partners maintains a Trade Allocation and Aggregation Policy as well as a Simultaneous Management Policy to ensure that client accounts are treated equitably and an IPO Allocation Policy. Compliance reviews allocation to ensure that investments are being allocated among all eligible accounts in an equitable manner.

Boston Partners has developed soft dollar policies which require it to make a good faith allocation of "mixed use" services and to document its analysis. Boston Partners prohibits correcting a trade error for any quid pro quo with a broker and has procedures for the proper correction of trade errors.

Boston Partners does not permit cross trades or principal trades. Employees have a duty to advance Boston Partners' client interests before firm or personal interests. The Code of Ethics includes procedures on ethical conduct and personal trading, including preclearance and blackout procedures, to which all employees are subject.



No

SG 04	Voluntary	Descriptive	General
SG 04.1	Indicate if your organisation has a process for identifying and managing incidents that occur within investee entities.		
<input checked="" type="checkbox"/> Yes <input type="radio"/> No			
SG 04.2	Describe your process on managing incidents		
<p>The Boston Partners Fundamenetal Analyst team and the Sustainability and Engagement Team monitor portfolio companies for ESG incidents. The teams may communicate with the issuer for additional information regarding the scope of the incident and efforts to ameliorate the incident and prevent repetition. Based on this information, the fundamental analyst may decided to recommend continuing to hold the security with additional monitoring or sell the security.</p>			

SG 05	Mandatory	Gateway/Core Assessed	General
SG 05.1	Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.		
<input checked="" type="checkbox"/> Quarterly or more frequently <input type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input type="radio"/> Ad-hoc basis <input type="radio"/> It is not set/reviewed			
SG 05.2	Additional information. [Optional]		
<p>The Sustainability and Engagement Team has a mandate to undertake original research on holdings in the Boston Partners' portfolios and to engage with portfolio companies regarding ESG improvements. The team reviews the status of research and engagement activities at least weekly.</p>			

SG 06	Voluntary	Descriptive	General
SG 06.1	List the main responsible investment objectives that your organisation set for the reporting year.		
Responsible investment processes			
<input type="checkbox"/> Provide training on ESG incorporation <input type="checkbox"/> Provide training on ESG engagement <input type="checkbox"/> Improved communication of ESG activities within the organisation <input type="checkbox"/> Improved engagement to encourage change with regards to management of ESG issues <input type="checkbox"/> Improved ESG incorporation into investment decision making processes <input type="checkbox"/> Other, specify (1) <input type="checkbox"/> Other, specify (2) <input type="checkbox"/> Other, specify (3) <input checked="" type="checkbox"/> None of the above			
Financial performance of investments			
<input type="checkbox"/> Increase portfolio performance by consideration of ESG factors <input type="checkbox"/> Other, specify (1) <input type="checkbox"/> Other, specify (2) <input type="checkbox"/> Other, specify (3) <input checked="" type="checkbox"/> None of the above			
ESG characteristics of investments			
<input type="checkbox"/> Over or underweight companies based on ESG characteristics <input type="checkbox"/> Improve ESG ratings of portfolio <input type="checkbox"/> Setting carbon reduction targets for portfolio <input checked="" type="checkbox"/> Other, specify (1)			
Other description (1)			
<p>Review the ESG profile of issuers held in investment portfolios, identify ESG considerations that warrant improvement, engage with the issuer regarding identified areas of improvement,</p>			
Key performance indicator			
None specified			
Progress achieved			
<p>We do not set specific goals other than to ensure that we continue to progress on original company research and engagement and to monitor issuer responses to our engagement topics.</p>			

- Other, specify (2)
- Other, specify (3)
- None of the above

**Other activities**

- Joining and/or participation in RI initiatives
- Encouraging others to join a RI initiative
- Documentation of best practice case studies
- Using case studies to demonstrate engagement and ESG incorporation to clients
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)
- None of the above

SG 06.2 Additional information.  
none

**SG 07** Mandatory Core Assessed General

**SG 07.1** Indicate the internal and/or external roles used by your organisation, and indicate for each whether they have oversight and/or implementation responsibilities for responsible investment.

**Roles**

- Board members or trustees
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Internal Roles (triggers other options)

**Select from the below internal roles**

- Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Other Chief-level staff or head of department, specify
- Portfolio managers
- Investment analysts
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Dedicated responsible investment staff
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Investor relations
- Other role, specify (1)
- Other role, specify (2)

- External managers or service providers

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

The Board of Directors is ultimately responsible for compliance by Boston Partners with its stated mandate, including the application of its ESG policy. Reporting to the Board on ESG investment matters is done as necessary. The Chief Investment Officer and the Director of Fundamental Research and the Director of Quantitative Research have supervisory oversight responsibility for the incorporation of ESG factors into the investment recommendation. The fundamental analysts are responsible for incorporating ESG factors into their investment research and recommendations. The Sustainability and Engagement Team is responsible for producing original research on an issuer's ESG considerations and providing that to the fundamental analysts.

**SG 07.3** Indicate the number of dedicated responsible investment staff your organisation has.

3

**SG 07 CC** Mandatory to Report, Voluntary to Disclose Descriptive General

SG 07.5 CC	Indicate the roles in the organisation that have oversight, accountability and/or management responsibilities for climate-related issues.
	<b>Board members or trustees</b>
	<input type="checkbox"/> Oversight/accountability for climate-related issues <input type="checkbox"/> Assessment and management of climate-related issues <input checked="" type="checkbox"/> No responsibility for climate-related issues
	<b>Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Risk Officer (CRO), Investment Committee</b>
	<input checked="" type="checkbox"/> Oversight/accountability for climate-related issues <input checked="" type="checkbox"/> Assessment and management of climate-related issues <input type="checkbox"/> No responsibility for climate-related issues
	<b>Investment analysts</b>
	<input checked="" type="checkbox"/> Oversight/accountability for climate-related issues <input checked="" type="checkbox"/> Assessment and management of climate-related issues <input type="checkbox"/> No responsibility for climate-related issues
	<b>Dedicated responsible investment staff</b>
	<input checked="" type="checkbox"/> Oversight/accountability for climate-related issues <input checked="" type="checkbox"/> Assessment and management of climate-related issues <input type="checkbox"/> No responsibility for climate-related issues

**SG 07.7 CC** For management-level roles that assess and manage climate-related issues, provide further information on the structure and processes involved.

The CEO and Chief Investment Officer and the Director of Fundamental Research are informed regularly of the results of sustainability research regarding issuers held for client portfolios and participate in investment discussions regarding those issues with ultimate oversight of the climate and other sustainability risks and opportunities in the portfolios.

SG 08	Voluntary	Additional Assessed	General
SG 08.1	Indicate if your organisation's performance management, reward and/or personal development processes have a responsible investment element.		
	<b>Board members/Board of trustees</b>		
SG 08.1b	RI in personal development and/or training plan		
	<input type="checkbox"/> Responsible investment included in personal development and/or training plan <input checked="" type="checkbox"/> None of the above		
	<b>Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee</b>		
SG 08.1a	RI in objectives, appraisal and/or reward		
	<input type="checkbox"/> Responsible investment KPIs and/or goals included in objectives <input type="checkbox"/> Responsible investment included in appraisal process <input type="checkbox"/> Variable pay linked to responsible investment performance <input checked="" type="checkbox"/> None of the above		
SG 08.1b	RI in personal development and/or training plan		
	<input type="checkbox"/> Responsible investment included in personal development and/or training plan <input checked="" type="checkbox"/> None of the above		
	<b>Investment analysts</b>		
SG 08.1a	RI in objectives, appraisal and/or reward		
	<input type="checkbox"/> Responsible investment KPIs and/or goals included in objectives <input checked="" type="checkbox"/> Responsible investment included in appraisal process <input type="checkbox"/> Variable pay linked to responsible investment performance <input type="checkbox"/> None of the above		
SG 08.1b	RI in personal development and/or training plan		
	<input checked="" type="checkbox"/> Responsible investment included in personal development and/or training plan <input type="checkbox"/> None of the above		
	<b>Dedicated responsible investment staff</b>		

SG 08.1a	RI in objectives, appraisal and/or reward
<input type="checkbox"/> Responsible investment KPIs and/or goals included in objectives <input checked="" type="checkbox"/> Responsible investment included in appraisal process <input checked="" type="checkbox"/> Variable pay linked to responsible investment performance <input type="checkbox"/> None of the above	
SG 08.1b	RI in personal development and/or training plan
<input checked="" type="checkbox"/> Responsible investment included in personal development and/or training plan <input type="checkbox"/> None of the above	

SG 08.3 Provide any additional information on your organisation's performance management, reward and/or personal development processes in relation to responsible investment.

Responsible investment is one factor considered in the process for determining the annual incentive compensation of the fundamental analyst and sustainability and engagement team.

SG 09	Mandatory	Core Assessed	PRI 4,5
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SG 09.1 Select the collaborative organisation and/or initiatives of which your organisation is a member or in which it participated during the reporting year, and the role you played.

Principles for Responsible Investment

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

Basic

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

Boston Partners' joined the PRI in March 2018, attended the PRI In Person conference in San Francisco in September 2018, and joined one of the PRI focus groups. During 2019, members of the Sustainability and Engagement team have remained engaged with PRI through PRI communication emails and webinars.

- Asian Corporate Governance Association
- Australian Council of Superannuation Investors
- AVCA: Sustainability Committee
- France Invest – La Commission ESG
- BVCA – Responsible Investment Advisory Board
- CDP Climate Change
- CDP Forests
- CDP Water
- CFA Institute Centre for Financial Market Integrity
- Climate Action 100+
- Code for Responsible Investment in SA (CRISA)
- Council of Institutional Investors (CII)
- Eumedion
- Extractive Industries Transparency Initiative (EIT)
- ESG Research Australia
- Invest Europe Responsible Investment Roundtable
- Global Investors Governance Network (GIGN)
- Global Impact Investing Network (GIIN)
- Global Real Estate Sustainability Benchmark (GRESB)
- Green Bond Principles
- HKVCA: ESG Committee
- Institutional Investors Group on Climate Change (IIGCC)
- Interfaith Center on Corporate Responsibility (ICCR)
- International Corporate Governance Network (ICGN)
- Investor Group on Climate Change, Australia/New Zealand (IGCC)
- International Integrated Reporting Council (IIRC)
- Investor Network on Climate Risk (INCR)/CERES
- Local Authority Pension Fund Forum
- Principles for Financial Action in the 21st Century
- Principles for Sustainable Insurance
- Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify
- Responsible Finance Principles in Inclusive Finance
- Shareholder Association for Research and Education (Share)
- United Nations Environmental Program Finance Initiative (UNEP FI)

- United Nations Global Compact
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify

SG 10	Mandatory	Core Assessed	PRI 4
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**SG 10.1** Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.

Yes

**SG 10.2** Indicate the actions your organisation has taken to promote responsible investment independently of collaborative initiatives. Provide a description of your role in contributing to the objectives of the selected action and the typical frequency of your participation/contribution.

- Provided or supported education or training programmes (this includes peer to peer RI support) Your education or training may be for clients, investment managers, actuaries, broker/dealers, investment consultants, legal advisers etc.)
- Provided financial support for academic or industry research on responsible investment
- Provided input and/or collaborated with academia on RI related work
- Encouraged better transparency and disclosure of responsible investment practices across the investment industry

Description
Met with numerous issuers to encourage the publication of sustainability reports.

Met with numerous issuers to encourage the publication of sustainability reports.

Frequency of contribution
<input type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input checked="" type="radio"/> Ad hoc <input type="radio"/> Other

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

- Spoke publicly at events and conferences to promote responsible investment
- Wrote and published in-house research papers on responsible investment
- Encouraged the adoption of the PRI
- Responded to RI related consultations by non-governmental organisations (OECD, FSB etc.)
- Wrote and published articles on responsible investment in the media
- A member of PRI advisory committees/ working groups, specify

Description
UN PRI Global Policy Reference Group

UN PRI Global Policy Reference Group

Frequency of contribution
<input checked="" type="radio"/> Quarterly or more frequently <input type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input type="radio"/> Ad hoc <input type="radio"/> Other

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

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

No

SG 11	Voluntary	Additional Assessed	PRI 4,5,6
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**SG 11.1** Indicate if your organisation - individually or in collaboration with others - conducted dialogue with public policy makers or regulators in support of responsible investment in the reporting year.

Yes  
 No

Please explain
We do not see dialogue with public policy makers or regulators as part of our investment process.

We do not see dialogue with public policy makers or regulators as part of our investment process.

SG 12	Mandatory	Core Assessed	PRI 4
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**SG 12.1** Indicate whether your organisation uses investment consultants.

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

SG 13	Mandatory	Descriptive	PRI 1
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SG 13.1	Indicate whether the organisation carries out scenario analysis and/or modelling, and if it does, provide a description of the scenario analysis (by asset class, sector, strategic asset allocation, etc.).
---------	--

- Yes, in order to assess future ESG factors
- Yes, in order to assess future climate-related risks and opportunities

	Describe
--	----------

As of year-end 2019, we conduct a quarterly Climate Impact Assessment through ISS ESG for each investment product/strategy.

- No, our organisation does not currently carry out scenario analysis and/or modelling

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

	We do the following
--	---------------------

- Allocation between asset classes
- Determining fixed income duration
- Allocation of assets between geographic markets
- Sector weightings
- Other, specify

Asset allocation is a function of issuer selection and issuer selection incorporates ESG issues. ESG issues may also affect sector opinions.

- We do not consider ESG issues in strategic asset allocation

SG 13 CC	Mandatory to Report, Voluntary to Disclose	Descriptive	General
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SG 13.4 CC	Describe how your organisation is using scenario analysis to manage climate-related risks and opportunities, including how the analysis has been interpreted, its results, and any future plans.
------------	--

- Initial assessment
- Incorporation into investment analysis
- Inform active ownership

	Describe
--	----------

Each portfolio manager receives a quarterly Climate Impact Assessment for the product he/she manages to take into consideration.

- Other

SG 13.5 CC	Indicate who uses this analysis.
------------	----------------------------------

- Board members, trustees, C-level roles, Investment Committee
- Portfolio managers
- Dedicated responsible investment staff
- External managers
- Investment consultants/actuaries
- Other

	specify
--	---------

Clients who inquire about climate-related matters may receive a Climate Impact Assessment report.

SG 13.6 CC	Indicate whether your organisation has evaluated the potential impact of climate-related risks, beyond the investment time horizon, on its investment strategy.
------------	---

- Yes
- No

	Please explain the rationale
--	------------------------------

The firm is in the early stages of assessing and considering climate-related risks. The Sustainability and Engagement Team considers climate-related risks as part of its analysis of an issuer, including the way and the extent that the issuer is incorporating climate change into its operations/products/outlook.

SG 13.7 CC	Indicate whether a range of climate scenarios is used.
------------	--

- Analysis based on a 2°C or lower scenario
- Analysis based on an abrupt transition, consistent with the Inevitable Policy Response
- Analysis based on a 4°C or higher scenario
- No, a range is not used

**SG 13.8 CC** Indicate the climate scenarios your organisation uses.

Provider	Scenario used
IEA	
IEA	<input checked="" type="checkbox"/> Energy Technology Perspectives (ETP) 2 Degrees scenario
IEA	
IEA	
IEA	
IRENA	
Greenpeace	
Institute for Sustainable Development	
Bloomberg	
IPCC	
IPCC	
IPCC	
IPCC	
Other	
Other	
Other	

**SG 14** Mandatory to Report, Voluntary to Disclose Additional Assessed **PRI 1**

**SG 14.1** Some investment risks and opportunities arise as a result of long term trends. Indicate which of the following are considered.

- Changing demographics
- Climate change
- Resource scarcity
- Technological developments
- Other, specify(1)
- Other, specify(2)
- None of the above

**SG 14.2** Indicate which of the following activities you have undertaken to respond to climate change risk and opportunity

- Established a climate change sensitive or climate change integrated asset allocation strategy
- Targeted low carbon or climate resilient investments

Specify the AUM invested in low carbon and climate resilient portfolios, funds, strategies or asset classes.	
Total AUM	
1,691,846 USD	
1691846 USD	

**Specify the framework or taxonomy used.**

Boston Partners launched a Dynamic Sustainability Product in 2019. The Product seeks growth of capital by investing in companies in global developed markets that have good financial and environmental, social and governance ("ESG") attributes. The ESG Team will assess each issuer in the Investible Universe based upon the criteria set forth in the Boston Partners' Sustainability and Engagement Policy, including, in particular, products or services of such issuer which are inherently beneficial such as increasing agricultural productivity, reducing greenhouse gases or similar emissions, or improving lives with better health solutions.

- Phase out your investments in your fossil fuel holdings
- Reduced portfolio exposure to emissions intensive or fossil fuel holdings
- Used emissions data or analysis to inform investment decision making
- Sought climate change integration by companies
- Sought climate supportive policy from governments
- Other, specify
- None of the above

**SG 14.3** Indicate which of the following tools the organisation uses to manage climate-related risks and opportunities.

- Scenario analysis
- Disclosures on emissions risks to clients/trustees/management/beneficiaries
- Climate-related targets
- Encouraging internal and/or external portfolio managers to monitor emissions risks

- Emissions-risk monitoring and reporting are formalised into contracts when appointing managers
- Weighted average carbon intensity
- Carbon footprint (scope 1 and 2)
- Portfolio carbon footprint
- Total carbon emissions
- Carbon intensity
- Exposure to carbon-related assets
- Other emissions metrics
- Other, specify
- None of the above

SG 14 CC	Voluntary		General
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SG 14.6 CC Provide further details on the key metric(s) used to assess climate-related risks and opportunities.

Metric Type	Coverage	Purpose	Metric Unit	Metric Methodology
Carbon footprint (scope 1 and 2)	Minority of assets	inform/monitor investments	tCO2e	ISS ESG Climate Impact Assessment
Portfolio carbon footprint	Majority of assets	inform/monitor investments	tCO2e	ISS ESG Climate Impact Assessment
Carbon intensity	Minority of assets	inform/monitor investments	tCO <sub>2</sub> e/Mio USD Revenue	ISS ESG Climate Impact Assessment

SG 14.8 CC Indicate whether climate-related risks are integrated into overall risk management and explain the risk management processes used for identifying, assessing and managing climate-related risks.

- Processes for climate-related risks are integrated into overall risk management

Please describe  
Climate-related risk is issuer specific and is considered along with all other issuer risks in both security selection and in sector limits and allocations.

- Processes for climate-related risks are not integrated into overall risk management

SG 14.9 CC Indicate whether your organisation, and/or external investment manager or service providers acting on your behalf, undertake active ownership activities to encourage TCFD adoption.

- Yes

Please describe  
Through engagement letters, calls, and meetings, we encourage issuers to adopt TCFD.

- No, we do not undertake active ownership activities.
- No, we do not undertake active ownership activities to encourage TCFD adoption.

SG 15	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1
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SG 15.1 Indicate if your organisation allocates assets to, or manages, funds based on specific environmental and social themed areas.

- Yes
- No

SG 18	Voluntary	Descriptive	General
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SG 18.1 Indicate whether any specific features of your approach to responsible investment are particularly innovative.

- Yes

SG 18.2 Describe any specific features of your approach to responsible investment that you believe are particularly innovative.  
Boston Partners undertakes comprehensive original research on ESG factors rather than relying on third-party research. The Sustainability and Engagement Team includes two lawyers to understand litigation and regulatory matters thoroughly.

- No

SG 19	Mandatory	Core Assessed	PRI 2, 6
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SG 19.1 Indicate whether your organisation typically discloses asset class specific information proactively. Select the frequency of the disclosure to clients/beneficiaries and the public, and provide a URL to the public information.

Listed equity - Incorporation  
Do you disclose?  
 We do not proactively disclose it to the public and/or clients/beneficiaries



We disclose to clients/beneficiaries only.

We disclose it publicly

The information disclosed to clients/beneficiaries is the same	
<input checked="" type="radio"/> Yes	
<input type="radio"/> No	

<b>Disclosure to public and URL</b>	
Disclosure to public and URL	
<input type="radio"/> Broad approach to ESG incorporation	
<input checked="" type="radio"/> Detailed explanation of ESG incorporation strategy used	
Annually	
<a href="https://www.boston-partners.com/wp-content/uploads/2018/08/ESG-Policy.pdf">https://www.boston-partners.com/wp-content/uploads/2018/08/ESG-Policy.pdf</a>	

### Listed equity - Engagement

Do you disclose?	
<input type="radio"/> We do not disclose to either clients/beneficiaries or the public.	
<input type="radio"/> We disclose to clients/beneficiaries only.	
<input checked="" type="radio"/> We disclose to the public	
The information disclosed to clients/beneficiaries is the same	
<input checked="" type="radio"/> Yes	
<input type="radio"/> No	

<b>Disclosure to public and URL</b>	
Disclosure to public and URL	
<input checked="" type="checkbox"/> Details on the overall engagement strategy	
<input checked="" type="checkbox"/> Details on the selection of engagement cases and definition of objectives of the selections, priorities and specific goals	
<input checked="" type="checkbox"/> Number of engagements undertaken	
<input checked="" type="checkbox"/> Breakdown of engagements by type/topic	
<input type="checkbox"/> Breakdown of engagements by region	
<input type="checkbox"/> An assessment of the current status of the progress achieved and outcomes against defined objectives	
<input checked="" type="checkbox"/> Examples of engagement cases	
<input type="checkbox"/> Details on eventual escalation strategy taken after the initial dialogue has been unsuccessful (i.e. filing resolutions, issuing a statement, voting against management, divestment etc.)	
<input type="checkbox"/> Details on whether the provided information has been externally assured	
<input type="checkbox"/> Outcomes that have been achieved from the engagement	
<input type="checkbox"/> Other information	
Quarterly or more frequently	
<a href="https://www.boston-partners.com/engagement-and-sustainability/">https://www.boston-partners.com/engagement-and-sustainability/</a> <a href="https://www.boston-partners.com/wp-content/uploads/2020/01/dec-2019f-engagement-report.pdf">https://www.boston-partners.com/wp-content/uploads/2020/01/dec-2019f-engagement-report.pdf</a>	

### Listed equity - (Proxy) Voting

Do you disclose?	
<input type="radio"/> We do not disclose to either clients/beneficiaries or the public.	
<input type="radio"/> We disclose to clients/beneficiaries only.	
<input checked="" type="radio"/> We disclose to the public	
The information disclosed to clients/beneficiaries is the same	
<input checked="" type="radio"/> Yes	
<input type="radio"/> No	

<b>Disclosure to public and URL</b>	
-------------------------------------	--

Disclosure to public and URL	
<input checked="" type="checkbox"/> Disclose all voting decisions	
<input type="checkbox"/> Disclose some voting decisions	
<input type="checkbox"/> Only disclose abstentions and votes against management	
Annually	
<a href="https://www.boston-partners.com/wp-content/uploads/2020/01/2019-proxy-votes-by-issuer.pdf">https://www.boston-partners.com/wp-content/uploads/2020/01/2019-proxy-votes-by-issuer.pdf</a>	

SG Checks

Checks

If there are any messages below, please review them before continuing. If there are no messages below, please save this page and continue.

LEI 01.1	Indicate which ESG incorporation strategy and/or combination of strategies you apply to your actively managed listed equities; and the breakdown of your actively managed listed equities by strategy or combination of strategies.
----------	---

- Screening alone (i.e., not combined with any other strategies)
  - Thematic alone (i.e., not combined with any other strategies)
  - Integration alone (i.e., not combined with any other strategies)
  - Screening and integration strategies
- |   |      |
|---|------|
| Percentage of active listed equity to which the strategy is applied – you may estimate +/- 5% | 100% |
|---|------|
- Thematic and integration strategies
  - Screening and thematic strategies
  - All three strategies combined
  - We do not apply incorporation strategies

LEI 02.1	Indicate what ESG information you use in your ESG incorporation strategies and who provides this information.
----------	---

- Raw ESG company data
  - ESG research provider
  - Sell-side
  - In-house – specialised ESG analyst or team
  - In-house – analyst or portfolio manager
- Company-related analysis or ratings
  - ESG research provider
  - Sell-side
  - In-house – specialised ESG analyst or team
  - In-house – analyst or portfolio manager
- Sector-related analysis or ratings
  - ESG research provider
  - Sell-side
  - In-house – specialised ESG analyst or team
  - In-house – analyst or portfolio manager
- Country-related analysis or ratings
- Screened stock list
- ESG issue-specific analysis or ratings
  - ESG research provider
  - Sell-side
  - In-house – specialised ESG analyst or team
  - In-house – analyst or portfolio manager
- Other, specify

LEI 02.2	Indicate whether you incentivise brokers to provide ESG research.
----------	---

- Yes
- No

LEI 02.4	Additional information. [Optional]
----------	------------------------------------

We have access to ESG-related research from various sell-side providers/brokers, as well as Bloomberg.

LEI 03.1	Indicate whether your organisation has a process through which information derived from ESG engagement and/or (proxy) voting activities is made available for use in investment decision-making.
----------	--

- Engagement
  - We have a systematic process to ensure the information is made available.
  - We occasionally make this information available.
  - We do not make this information available.
- (Proxy) voting
  - We have a systematic process to ensure the information is made available.

- We occasionally make this information available.
- We do not make this information available.

LEI 04	Mandatory	Descriptive	PRI 1				
LEI 04.1	Indicate and describe the type of screening you apply to your internally managed active listed equities.						
<input checked="" type="checkbox"/> Negative/exclusionary screening <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Product</li> <li><input checked="" type="checkbox"/> Activity</li> <li><input type="checkbox"/> Sector</li> <li><input type="checkbox"/> Country/geographic region</li> <li><input checked="" type="checkbox"/> Environmental and social practices and performance</li> <li><input checked="" type="checkbox"/> Corporate governance</li> </ul> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 20%;"></th> <th style="background-color: #0070C0; color: white;">Description</th> </tr> </thead> <tbody> <tr> <td></td> <td>Boston Partners reviews an issuer's products, activities and ESG practices as part of the fundamental analyst's investment considerations.</td> </tr> </tbody> </table> <ul style="list-style-type: none"> <li><input type="checkbox"/> Positive/best-in-class screening</li> <li><input type="checkbox"/> Norms-based screening</li> </ul>					Description		Boston Partners reviews an issuer's products, activities and ESG practices as part of the fundamental analyst's investment considerations.
	Description						
	Boston Partners reviews an issuer's products, activities and ESG practices as part of the fundamental analyst's investment considerations.						
LEI 04.2	Describe how you notify clients and/or beneficiaries when changes are made to your screening criteria.						
We would have a change in our ESG policy which is published on our website							
LEI 05	Mandatory	Core Assessed	PRI 1				
LEI 05.1	Indicate which processes your organisation uses to ensure ESG screening is based on robust analysis.						
<input checked="" type="checkbox"/> Comprehensive ESG research is undertaken or sourced to determine companies' activities and products. <ul style="list-style-type: none"> <li><input type="checkbox"/> Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies.</li> <li><input type="checkbox"/> External research and data used to identify companies to be excluded/included is subject to internal audit by ESG/RI staff, the internal audit function or similar.</li> <li><input type="checkbox"/> Third-party ESG ratings are updated regularly to ensure that portfolio holdings comply with fund policies.</li> <li><input type="checkbox"/> Trading platforms blocking / restricting flagged securities on the black list.</li> <li><input type="checkbox"/> A committee, body or similar with representatives independent of the individuals who conduct company research reviews some or all screening decisions.</li> <li><input type="checkbox"/> A periodic review of internal research is carried out.</li> <li><input type="checkbox"/> Review and evaluation of external research providers.</li> <li><input type="checkbox"/> Other; specify</li> <li><input type="checkbox"/> None of the above</li> </ul>							
LEI 05.2	Indicate the proportion of your actively managed listed equity portfolio that is subject to comprehensive ESG research as part your ESG screening strategy.						
<input type="checkbox"/> <10% <ul style="list-style-type: none"> <li><input type="checkbox"/> 10-50%</li> <li><input type="checkbox"/> 51-90%</li> <li><input checked="" type="checkbox"/> &gt;90%</li> </ul>							
LEI 06	Voluntary	Additional Assessed	PRI 1				
LEI 06.1	Indicate which processes your organisation uses to ensure fund criteria are not breached.						
<ul style="list-style-type: none"> <li><input type="checkbox"/> Systematic checks are performed to ensure that stocks meet the fund's screening criteria</li> <li><input type="checkbox"/> Automated IT systems prevent investment managers from investing in excluded stocks or those that do not meet positive screening criteria</li> <li><input type="checkbox"/> Audits of fund holdings are undertaken regularly by internal audit function</li> <li><input type="checkbox"/> Periodic auditing/checking of the organisations RI funds by external party</li> <li><input checked="" type="checkbox"/> Other; specify           <ul style="list-style-type: none"> <li>There are no specific screening criteria that result in either inclusion or exclusion from a portfolio. ESG considerations are one investment factor.</li> </ul> </li> <li><input type="checkbox"/> None of the above</li> </ul>							
LEI 06.2	If breaches of fund screening criteria are identified, describe the process followed to correct those breaches.						
Not applicable							
LEI 08	Mandatory	Core Assessed	PRI 1				
LEI 08.1	Indicate the proportion of actively managed listed equity portfolios where E, S and G factors are systematically researched as part of your investment analysis.						
ESG issues	Proportion impacted by analysis						

Environmental	<div style="background-color: #0070C0; color: white; padding: 2px; text-align: right; font-weight: bold;">Environmental</div> <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90%
Social	<div style="background-color: #0070C0; color: white; padding: 2px; text-align: right; font-weight: bold;">Social</div> <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90%
Corporate Governance	<div style="background-color: #0070C0; color: white; padding: 2px; text-align: right; font-weight: bold;">Corporate Governance</div> <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90%

LEI 09	Mandatory	Core Assessed	PRI 1
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LEI 09.1	Indicate which processes your organisation uses to ensure ESG integration is based on robust analysis.
----------	--

- Comprehensive ESG research is undertaken or sourced to determine companies' activities and products
- Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- Third-party ESG ratings are updated regularly
- A periodic review of the internal research is carried out
- Structured, regular ESG specific meetings between responsible investment staff and the fund manager or within the investments team
- ESG risk profile of a portfolio against benchmark
- Analysis of the impact of ESG factors on investment risk and return performance
- Other; specify
- None of the above

LEI 09.2	Indicate the proportion of your actively managed listed equity portfolio that is subject to comprehensive ESG research as part your integration strategy.
----------	---

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

LEI 09.5	Describe how ESG information is held and used by your portfolio managers.
----------	---

- ESG information is held within centralised databases or tools, and it is accessible by all relevant staff
- ESG information or analysis is a standard section or aspect of all company research notes or industry/sector analysis generated by investment staff
- Systematic records are kept that capture how ESG information and research were incorporated into investment decisions
- Other; specify
- None of the above

LEI 09.6	Additional information. [Optional]
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ESG reviews of issuers are uploaded to our internal online reporting platform and are saved on the shared drive on the internal network.

LEI 10	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 1
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LEI 10.1	Indicate which aspects of investment analysis you integrate material ESG information into.
----------	--

- Economic analysis
- Industry analysis
- Quality of management
- Analysis of company strategy
- Portfolio weighting
- Security sensitivity and/or scenario analysis
- Fair value/fundamental analysis

Proportion of actively managed listed equity exposed to investment analysis
---

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

Other; specify

**LEI 10.2** Indicate which methods are part of your process to integrate ESG information into fair value/fundamental analysis.

- Adjustments to forecasted company financials (sales, operating costs, earnings, cash flows)
- Adjustments to valuation-model variables (discount rates, terminal value, perpetuity growth rates)
- Valuation multiples
- Other adjustments; specify

adjustments are discretionary with the fundamental analyst and could affect any part of the analysis.

**LEI 10.4** Describe the methods you have used to adjust the income forecast/valuation tool.

Adjustments are discretionary with the fundamental analyst and could affect any part of the analysis.

**LEI Checks** **Checks**

If there are any messages below, please review them before continuing. If there are no messages below, please save this page and continue.

**LEA 01.1** Indicate whether your organisation has an active ownership policy (includes engagement and/or voting).

Yes

**LEA 01.2** Attach or provide a URL to your active ownership policy.

Attachment provided:

URL provided:

<https://www.boston-partners.com/wp-content/uploads/2018/08/ESG-Policy.pdf>

**LEA 01.3** Indicate what your active engagement policy covers:

**General approach to Active Ownership**

- Conflicts of interest
- Alignment with national stewardship code requirements
- Assets/funds covered by active ownership policy
- Expectations and objectives
- Engagement approach

**Engagement**

- ESG issues
- Prioritisation of engagement
- Methods of engagement
- Transparency of engagement activities
- Due diligence and monitoring process
- Insider information
- Escalation strategies
- Service Provider specific criteria
- Other, (specify)

(Proxy) voting approach

**Voting**

- ESG issues
- Prioritisation and scope of voting activities
- Methods of voting
- Transparency of voting activities
- Regional voting practice approaches
- Filing or co-filing resolutions
- Company dialogue pre/post-vote
- Decision-making processes
- Securities lending processes
- Other, (specify)

Other

None of the above

No

**LEA 01.4** Do you outsource any of your active ownership activities to service providers?

Yes

No

**LEA 02.1** Indicate the method of engagement, giving reasons for the interaction.

Type of engagement	Reason for interaction
Individual / Internal staff engagements	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues</li> <li><input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure</li> <li><input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management</li> <li><input type="checkbox"/> We do not engage via internal staff</li> </ul>

Collaborative engagements	<input type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues <input type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> To gain an understanding of ESG strategy and/or management <input checked="" type="checkbox"/> We do not engage via collaborative engagements
Service provider engagements	<input type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues <input type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> To gain an understanding of ESG strategy and/or management <input checked="" type="checkbox"/> We do not engage via service providers

LEA 03	Mandatory	Core Assessed	PRI 2
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LEA 03.1 Indicate whether your organisation has a formal process for identifying and prioritising engagements.

- Yes
- No

LEA 03.3 Additional information. [Optional]

The Team will provide a review of the ESG/Sustainability issues for those companies that have adverse scores on various ESG/Sustainability metrics as produced by several well-known organizations including Robeco SAM AG, a Boston Partners affiliate and a leader in the ESG/Sustainability field. Issuers with poor scores are prioritized to be researched, and the Team will engage with representatives from the issuer regarding deficiencies identified. The Team also engages with issuers via an engagement letter sent to the issuer when Boston Partners votes against management on items on the proxy. Further, many issuers reach out to Boston Partners as part of their shareholder engagement efforts.

LEA 04	Mandatory	Core Assessed	PRI 2
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LEA 04.1 Indicate whether you define specific objectives for your organisation's engagement activities.

Individual / Internal staff engagements	<input checked="" type="checkbox"/> All engagement activities <input type="checkbox"/> Majority of engagement activities <input type="checkbox"/> Minority of engagement activities <input type="checkbox"/> We do not define specific objectives for engagement activities carried out by internal staff
---	--

LEA 04.2 Additional information. [Optional]

Objectives are issuer specific but each engagement has a one or more topics for which we seek improvement by the issuer, either substantive activity change or disclosure.

LEA 05	Mandatory	Core Assessed	PRI 2
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LEA 05.1 Indicate whether you monitor and/or review engagement outcomes.

Individual / Internal staff engagements	<input type="radio"/> Yes, in all cases <input type="radio"/> Yes, in a majority of cases <input checked="" type="radio"/> Yes, in a minority of cases <input type="radio"/> We do not monitor, or review engagement outcomes when the engagement is carried out by our internal staff.
---	--

LEA 05.2 Indicate whether you do any of the following to monitor and/or review the progress of engagement activities.

Individual / Internal staff engagements	<input type="checkbox"/> Define timelines/milestones for your objectives <input checked="" type="checkbox"/> Track and/or monitor progress against defined objectives and/or KPIs <input type="checkbox"/> Track and/or monitor the progress of action taken when original objectives are not met <input type="checkbox"/> Revisit and, if necessary, revise objectives on a continuous basis <input type="checkbox"/> Other; specify
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LEA 05.3 Additional information. [Optional]

We will review engagement objectives periodically for most issuers.

LEA 06	Mandatory	Additional Assessed	PRI 2,4
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LEA 06.1 Indicate whether your organisation has an escalation strategy when engagements are unsuccessful.

- Yes

LEA 06.2 Indicate the escalation strategies used at your organisation following unsuccessful engagements.

- Collaborating with other investors
- Issuing a public statement
- Filing/submitting a shareholder resolution



- Voting against the re-election of the relevant directors
- Voting against the board of directors or the annual financial report
- Submitting nominations for election to the board
- Seeking legal remedy / litigation
- Reducing exposure (size of holdings)
- Divestment
- Other; specify

The sustainability and engagement team will inform the fundamental analyst if an issuer is not responding to our engagement requests

No

LEA 07	Voluntary	Additional Assessed	PRI 1,2
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LEA 07.1 Indicate whether insights gained from your organisation's engagements are shared with investment decision-makers.

Type of engagement	Insights shared
Individual / Internal staff engagements	<input type="radio"/> Yes, systematically <input checked="" type="radio"/> Yes, occasionally <input type="radio"/> No

LEA 07.2 Indicate the practices used to ensure that information and insights gained through engagements are shared with investment decision-makers.

- Involving investment decision-makers when developing an engagement programme
- Holding investment team meetings and/or presentations
- Using IT platforms/systems that enable data sharing
- Internal process that requires portfolio managers to re-balance holdings based on interaction and outcome levels
- Other; specify

We communicate with the relevant fundamental analyst or portfolio manager regarding engagement activities that involve noteworthy matters.

None

LEA 07.3 Indicate whether insights gained from your organisation's engagements are shared with your clients/beneficiaries.

Type of engagement	Insights shared
Individual/Internal staff engagements	<input checked="" type="radio"/> Yes, systematically <input type="radio"/> Yes, occasionally <input type="radio"/> No

LEA 07.4 Additional information. [Optional]

We post a monthly report that summarizes our engagement activities on the Boston Partners website.

LEA 08	Mandatory	Gateway	PRI 2
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LEA 08.1 Indicate whether you track the number of your engagement activities.

Type of engagement	Tracking engagements
Individual/Internal staff engagements	<input checked="" type="radio"/> Yes, we track the number of our engagements in full <input type="radio"/> Yes, we partially track the number of our engagements <input type="radio"/> We do not track

LEA 09	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 2
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LEA 09.1 Indicate the proportion of companies in your listed equities portfolio with which your organisation engaged during the reporting year.

	We did not complete any engagements in the reporting year.	Number of companies engaged (avoid double counting, see explanatory notes)	Proportion of companies engaged with, out of total listed equities portfolio
Individual / Internal staff engagements	<input type="checkbox"/> We did not complete any engagements in the reporting year.	452	59

LEA 09.2 Indicate the breakdown of engagements conducted within the reporting year by the number of interactions (including interactions made on your behalf).

No. of interactions with a company	% of engagements

<b>One interaction</b>	<input type="radio"/> >76% <input checked="" type="radio"/> 51-75% <input type="radio"/> 11-50% <input type="radio"/> 1-10% <input type="radio"/> None
<b>2 to 3 interactions</b>	<input type="radio"/> >76% <input type="radio"/> 51-75% <input checked="" type="radio"/> 11-50% <input type="radio"/> 1-10% <input type="radio"/> None
<b>More than 3 interactions</b>	<input type="radio"/> >76% <input type="radio"/> 51-75% <input type="radio"/> 11-50% <input checked="" type="radio"/> 1-10% <input type="radio"/> None
Total	<b>100%</b>

LEA 10	Voluntary	Additional Assessed	PRI 2
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**LEA 10.1** Indicate which of the following your engagement involved.

- Letters and emails to companies
  - In a minority of cases
  - In a majority of cases
  - In all cases
- Meetings and/or calls with board/senior management
  - In a minority of cases
  - In a majority of cases
  - In all cases
- Meetings and/or calls with the CSR, IR or other management
  - In a minority of cases
  - In a majority of cases
  - In all cases
- Visits to operations
- Visits to supplier(s) in supplier(s) from the company's supply chain
- Participation in roadshows
- Other

LEA 11	Voluntary	Descriptive	PRI 2
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**LEA 11.1** Provide examples of the engagements that your organisation or your service provider carried out during the reporting year.

Add Example 1

ESG Topic	<input checked="" type="checkbox"/> General ESG <input checked="" type="checkbox"/> Sustainability reporting
Conducted by	Individual / Internal
Objectives	<p>Tractor Supply Company (ticker symbol TSCO): TSCO operates rural lifestyle retail stores in the US. The Team reached out to TSCO following research on the company, and Investor Relations set up a call with TSCO's General Counsel, who oversees the sustainability program. The Team noted TSCO's disclosure is missing training data, safety statistics, and supplier oversight information. The Team also suggested including data about whistleblower complaints. The General Counsel noted TSCO has a good story to tell, referencing training, internal promotions, and a strong safety record. He expressed there is a robust audit program for suppliers with various requirements and social audits. However, this information is in the Vendor Portal on the website, so TSCO is working to migrate it over to the public website. TSCO mentioned they want the information to be similar to what peers disclose so that it can easily be compared. The Team suggested HPQ and COP as examples of companies that provide comprehensive disclosure and encouraged TSCO to focus on statistics and limit verbiage. TSCO also highlighted that the company was named to Barron's list of the top 100 sustainable companies and the FTSE4Good Index.</p>

Scope and Process	The Team reached out to TSCO following research on the company, and Investor Relations set up a call with TSCO's General Counsel, who oversees the sustainability program.
Outcomes	Ongoing

Add Example 2

ESG Topic	<input checked="" type="checkbox"/> Executive Remuneration <input checked="" type="checkbox"/> General ESG <input checked="" type="checkbox"/> Diversity <input checked="" type="checkbox"/> Shareholder rights <input checked="" type="checkbox"/> Sustainability reporting <input checked="" type="checkbox"/> Other governance
Conducted by	Individual / Internal
Objectives	Xerox Holdings Corporation (ticker symbol XRX): XRX designs, develops, and sells document management systems and solutions. XRX reached out to the Team to establish an ongoing dialog on executive compensation and governance matters. The Team had concerns about compensation and XRX explained the size of the total compensation package looked high due to the one-time, make-whole payment granted to the incoming CEO. XRX also explained the use of discretion and noted many of the issues ISS highlighted will be self-corrected or corrected through the natural course of things and will not be issues next year. The Team communicated that Boston Partners voted against three director nominees because they sit on more than three public company boards. The Team noted gender diversity on the Board is lacking and we have noticed a trend of companies aiming for 30% female representation on the Board. The Team communicated its preferences for the shareholder right to call a special meeting and act by written consent. The Team also commented on XRX's ESG disclosure.
Scope and Process	XRX reached out to the Team to establish an ongoing dialog on executive compensation and governance matters.
Outcomes	Ongoing

Add Example 3

ESG Topic	<input checked="" type="checkbox"/> Climate Change <input checked="" type="checkbox"/> General ESG <input checked="" type="checkbox"/> Diversity <input checked="" type="checkbox"/> Sustainability reporting
Conducted by	
Objectives	Vistra Energy Corp. (ticker symbol VST): VST is a power company. The Team emailed VST following a client inquiry and research on the company. The Team sought clarification around VST's emissions reduction targets and the progress VST has made transitioning from coal. VST responded providing more context around the targets and status of coal-fired generation. The Team also encouraged VST to consider the SASB sustainability disclosure topics and to increase diversity on the Board, and VST noted these are on their radar screen.
Scope and Process	The Team emailed VST following a client inquiry and research on the company.
Outcomes	Ongoing

- Add Example 4
- Add Example 5
- Add Example 6
- Add Example 7
- Add Example 8
- Add Example 9
- Add Example 10

LEA 12	Mandatory	Descriptive	PRI 2
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LEA 12.1	Indicate how you typically make your (proxy) voting decisions.
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Approach
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- We use our own research or voting team and make voting decisions without the use of service providers.
- We hire service providers who make voting recommendations and/or provide research that we use to guide our voting decisions.

Based on
----------

- The service-provider voting policy we sign off on
- Our own voting policy
- Our clients' requests or policies

- Other (explain)
- We hire service providers who make voting decisions on our behalf, except in some pre-defined scenarios where we review and make voting decisions.
- We hire service providers who make voting decisions on our behalf.

<b>LEA 12.2</b>	<b>Provide an overview of how you ensure that your agreed-upon voting policy is adhered to, giving details of your approach when exceptions to the policy are made.</b>
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We have hired ISS to provide proxy voting operations services. ISS has the Boston Partners' proxy voting policy and applies the policy to issues for companies held in the clients' portfolios. ISS sends an analysis of each meeting along with the Boston Partners' and ISS standard positions for review by Boston Partners. A member of the Sustainability and Engagement Team reviews the information for consistency with the policy and for the need to convene the Governance Committee to consider any issue in a proxy. Any changes to the stated position in the the Boston Partners' policy are required to be made by the Governance Committee and require the completion of a conflict questionnaire to identify any conflicts of the person proposing a change in policy. The voting information is conveyed to ISS for processing to the clients' custodians.

<b>LEA 14</b>	<b>Voluntary</b>	<b>Additional Assessed</b>	<b>PRI 2</b>
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<b>LEA 14.1</b>	<b>Does your organisation have a securities lending programme?</b>
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- Yes
- No

<b>LEA 14.2</b>	<b>Describe why your organisation does not lend securities.</b>
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This is a client requirement not an investment adviser requirement.

<b>LEA 14.4</b>	<b>Additional information. [Optional]</b>
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Not applicable.

<b>LEA 15</b>	<b>Mandatory</b>	<b>Descriptive</b>	<b>PRI 2</b>
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<b>LEA 15.1</b>	<b>Indicate the proportion of votes participated in within the reporting year in which where you or the service providers acting on your behalf raised concerns with companies ahead of voting.</b>
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- 100%
- 99-75%
- 74-50%
- 49-25%
- 24-1%
- Neither we nor our service provider(s) raise concerns with companies ahead of voting

<b>LEA 15.2</b>	<b>Indicate the reasons for raising your concerns with these companies ahead of voting.</b>
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- Vote(s) concerned selected markets
- Vote(s) concerned selected sectors
- Vote(s) concerned certain ESG issues
- Vote(s) concerned companies exposed to controversy on specific ESG issues
- Vote(s) concerned significant shareholdings
- Client request
- Other

<b>LEA 16</b>	<b>Mandatory</b>	<b>Core Assessed</b>	<b>PRI 2</b>
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<b>LEA 16.1</b>	<b>Indicate the proportion of votes where you, and/or the service provider(s) acting on your behalf, communicated the rationale to companies for abstaining or voting against management recommendations. Indicate this as a percentage out of all eligible votes.</b>
-----------------	--

- 100%
- 99-75%
- 74-50%
- 49-25%
- 24-1%
- We do not communicate the rationale to companies
- Not applicable because we and/or our service providers did not abstain or vote against management recommendations

<b>LEA 16.3</b>	<b>In cases where your organisation does communicate the rationale for abstaining or voting against management recommendations, indicate whether this rationale is made public.</b>
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- Yes
- No

<b>LEA 16.4</b>	<b>Additional information. [Optional]</b>
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When we vote against management recommendation, we send a letter to the issuer explaining our position.

<b>LEA 17</b>	<b>Mandatory</b>	<b>Core Assessed</b>	<b>PRI 2</b>
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<b>LEA 17.1</b>	<b>For listed equities in which you or your service provider have the mandate to issue (proxy) voting instructions, indicate the percentage of votes cast during the reporting year.</b>		
<input checked="" type="checkbox"/> We do track or collect this information			
	<table border="1"> <tr> <td><b>Votes cast (to the nearest 1%)</b></td> </tr> <tr> <td>99.6%</td> </tr> </table>	<b>Votes cast (to the nearest 1%)</b>	99.6%
<b>Votes cast (to the nearest 1%)</b>			
99.6%			
	<table border="1"> <tr> <td><b>Specify the basis on which this percentage is calculated</b></td> </tr> <tr> <td> <input type="checkbox"/> Of the total number of ballot items on which you could have issued instructions  <input checked="" type="checkbox"/> Of the total number of company meetings at which you could have voted  <input type="checkbox"/> Of the total value of your listed equity holdings on which you could have voted         </td> </tr> </table>	<b>Specify the basis on which this percentage is calculated</b>	<input type="checkbox"/> Of the total number of ballot items on which you could have issued instructions <input checked="" type="checkbox"/> Of the total number of company meetings at which you could have voted <input type="checkbox"/> Of the total value of your listed equity holdings on which you could have voted
<b>Specify the basis on which this percentage is calculated</b>			
<input type="checkbox"/> Of the total number of ballot items on which you could have issued instructions <input checked="" type="checkbox"/> Of the total number of company meetings at which you could have voted <input type="checkbox"/> Of the total value of your listed equity holdings on which you could have voted			
<input type="checkbox"/> We do not track or collect this information			

<b>LEA 17.2</b>	<b>Explain your reason(s) for not voting on certain holdings</b>
<input type="checkbox"/> Shares were blocked <input type="checkbox"/> Notice, ballots or materials not received on time <input type="checkbox"/> Missed deadline <input type="checkbox"/> Geographical restrictions (non-home market) <input checked="" type="checkbox"/> Cost <input type="checkbox"/> Conflicts of interest <input type="checkbox"/> Holdings deemed too small <input checked="" type="checkbox"/> Administrative impediments (e.g., power of attorney requirements, ineligibility due to participation in share placement) <input checked="" type="checkbox"/> Client request <input type="checkbox"/> Other (explain)	

<b>LEA 17.3</b>	<b>Additional information. [Optional]</b>
Boston Partners may refrain from voting proxies for certain clients in certain markets. These arrangements are outlined in respective client investment management agreements. Boston Partners may also refrain from voting proxies on behalf of clients when shares are out on loan; when share blocking is required to vote; where it is not possible to vote shares; where there are legal or operational difficulties; where Boston Partners believes the administrative burden and/ or associated cost exceeds the expected benefit to a client; or where not voting or abstaining produces the desired outcome.	

<b>LEA 18</b>	<b>Voluntary</b>	<b>Additional Assessed</b>	<b>PRI 2</b>
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<b>LEA 18.1</b>	<b>Indicate whether you track the voting instructions that you or your service provider on your behalf have issued.</b>																
<input checked="" type="checkbox"/> Yes, we track this information																	
	<table border="1"> <tr> <td><b>LEA 18.2</b></td> <td><b>Of the voting instructions that you and/or third parties on your behalf have issued, indicate the proportion of ballot items that were:</b></td> </tr> <tr> <td colspan="2"> <table border="1"> <tr> <td><b>Voting instructions Breakdown as percentage of votes cast</b></td> <td><b>For (supporting) management recommendations</b></td> </tr> <tr> <td>87%</td> <td></td> </tr> <tr> <td>Against (opposing) management recommendations</td> <td></td> </tr> <tr> <td>9%</td> <td></td> </tr> <tr> <td>Abstentions</td> <td></td> </tr> <tr> <td>4%</td> <td></td> </tr> </table> </td> </tr> </table>	<b>LEA 18.2</b>	<b>Of the voting instructions that you and/or third parties on your behalf have issued, indicate the proportion of ballot items that were:</b>	<table border="1"> <tr> <td><b>Voting instructions Breakdown as percentage of votes cast</b></td> <td><b>For (supporting) management recommendations</b></td> </tr> <tr> <td>87%</td> <td></td> </tr> <tr> <td>Against (opposing) management recommendations</td> <td></td> </tr> <tr> <td>9%</td> <td></td> </tr> <tr> <td>Abstentions</td> <td></td> </tr> <tr> <td>4%</td> <td></td> </tr> </table>		<b>Voting instructions Breakdown as percentage of votes cast</b>	<b>For (supporting) management recommendations</b>	87%		Against (opposing) management recommendations		9%		Abstentions		4%	
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87%																	
Against (opposing) management recommendations																	
9%																	
Abstentions																	
4%																	
<input type="checkbox"/> No, we do not track this information																	

<b>LEA 18.3</b>	<b>In cases where your organisation voted against management recommendations, indicate the percentage of companies which you have engaged.</b>
100	

<b>LEA 18.4</b>	<b>Additional information. [Optional]</b>
Abstain and Withhold votes counted as abstentions above.	

<b>LEA 19</b>	<b>Mandatory</b>	<b>Core Assessed</b>	<b>PRI 2</b>
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<b>LEA 19.1</b>	<b>Indicate whether your organisation has a formal escalation strategy following unsuccessful voting.</b>
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

<b>LEA 20</b>	<b>Voluntary</b>	<b>Descriptive</b>	<b>PRI 2</b>
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<b>LEA 20.1</b>	<b>Indicate whether your organisation, directly or through a service provider, filed or co-filed any ESG shareholder resolutions during the reporting year.</b>
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

<b>LEA 21</b>	<b>Voluntary</b>	<b>Descriptive</b>	<b>PRI 2</b>
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Add Example 1

ESG Topic	<input checked="" type="checkbox"/> Executive Remuneration <input checked="" type="checkbox"/> Other governance
Conducted by	Individual/Internal
Objectives	Voted against one director nominee due to overboarding concerns. Voted against the ratification of executive officer compensation. Amendments to the plan were made allowing acceleration of certain unvested equity awards. In addition, the company used its discretion to accelerate the vesting of certain equity grants. Voted for the requirement that the Chairman of the Board be independent.
Scope and Process	Boston Partners sent a letter to the issuer's board of directors explaining our positions.
Outcomes	Ongoing

Add Example 2

ESG Topic	<input checked="" type="checkbox"/> Executive Remuneration <input checked="" type="checkbox"/> Shareholder rights
Conducted by	Individual/Internal
Objectives	Voted against the ratification of named executive officer compensation because in addition to receiving a larger regular-cycle annual equity grant, the CEO was also awarded three sizable strategic growth equity grants. Voted for a proposal affording shareholders the right to act by written consent.
Scope and Process	Boston Partners wrote a letter to the issuer's board of directors explaining our positions.
Outcomes	Ongoing

Add Example 3

ESG Topic	<input checked="" type="checkbox"/> Executive Remuneration <input checked="" type="checkbox"/> Human rights <input checked="" type="checkbox"/> General ESG <input checked="" type="checkbox"/> Diversity <input checked="" type="checkbox"/> Labour practices and supply chain management <input checked="" type="checkbox"/> Other governance
Conducted by	Individual/Internal
Objectives	Withheld votes from two compensation committee members because there is poor stewardship over the executive pay program, as evidenced by continued use of outsized time-vested equity grants and a lack of performance-conditioned compensation, and a management say-on-pay proposal was not on the agenda. Withheld votes from one director nominee due to overboarding concerns. Voted against amendments to the company's omnibus stock plan. Voted for a recapitalization plan where all stock has equal voting rights (one vote per share). Voted for the adoption of a policy prohibiting inequitable employment practices. Voted for the establishment of a societal risk oversight committee. Voted for a report on sexual harassment policies. Voted for a majority vote requirement in director elections. Voted for a report on the company's gender pay gap. Voted for the adoption of a compensation clawback policy.
Scope and Process	Boston Partners wrote a letter to the issuer's board of directors explaining the rationale for Boston Partners' positions.
Outcomes	Ongoing

Add Example 4

Add Example 5

Add Example 6

Add Example 7

Add Example 8

Add Example 9

Add Example 10

If there are any messages below, please review them before continuing. If there are no messages below, please save this page and continue.

CM1 01	Mandatory	Additional Assessed	General
CM1 01.1	Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:		
	<input type="checkbox"/> Third party assurance over selected responses from this year's PRI Transparency Report <input type="checkbox"/> Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year <input type="checkbox"/> Third party assurance or audit of the correct implementation of RI processes (that have been reported to the PRI this year) <input type="checkbox"/> Internal audit of the correct implementation of RI processes and/or accuracy of RI data (that have been reported to the PRI this year) <input type="checkbox"/> Internal verification of responses before submission to the PRI (e.g. by the CEO or the board) <input type="checkbox"/> Other, specify <input checked="" type="checkbox"/> None of the above		
CM1 02	Mandatory	Descriptive	General
CM1 02.1	We undertook third party assurance on last year's PRI Transparency Report		
	<input type="radio"/> Whole PRI Transparency Report was assured last year <input type="radio"/> Selected data was assured in last year's PRI Transparency Report <input checked="" type="radio"/> We did not assure last year's PRI Transparency report <input type="radio"/> None of the above, we were in our preparation year and did not report last year.		
CM1 03	Mandatory	Descriptive	General
CM1 03.1	We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:		
	<input type="checkbox"/> We adhere to an RI certification or labelling scheme <input type="checkbox"/> We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report <input type="checkbox"/> ESG audit of holdings <input type="checkbox"/> Other, specify <input checked="" type="checkbox"/> None of the above		
CM1 04	Mandatory	Descriptive	General
CM1 04.1	Do you plan to conduct third party assurance of this year's PRI Transparency report?		
	<input type="radio"/> Whole PRI Transparency Report will be assured <input type="radio"/> Selected data will be assured <input checked="" type="radio"/> We do not plan to assure this year's PRI Transparency report		