



ASSESSMENT REPORT

2021 PILOT

Pareto Asset Management AS

Generated 2022-08-18

ABOUT THIS REPORT

The assessment report is designed to provide feedback to signatories and support ongoing learning and development. The high-level assessment methodology can be found [here](#) and question-level assessment criteria can be found after each indicator in the Investor Reporting Framework, [here](#). Note that the 2021 scoring methodology has changed to reflect the new Reporting Framework, and is incomparable with scores from previous PRI years.

Assessment Reports are confidential and only accessible to the reporting signatory on the Data Portal.

A dataset of medians based on all signatories' scores can be referenced [here](#).

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- present any scores/grades/classification generated internally or by a third party, for a module of the overall Assessment Report, as being from the PRI (e.g., recalculating, or recompiling PRI scores).

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- Transparency Report

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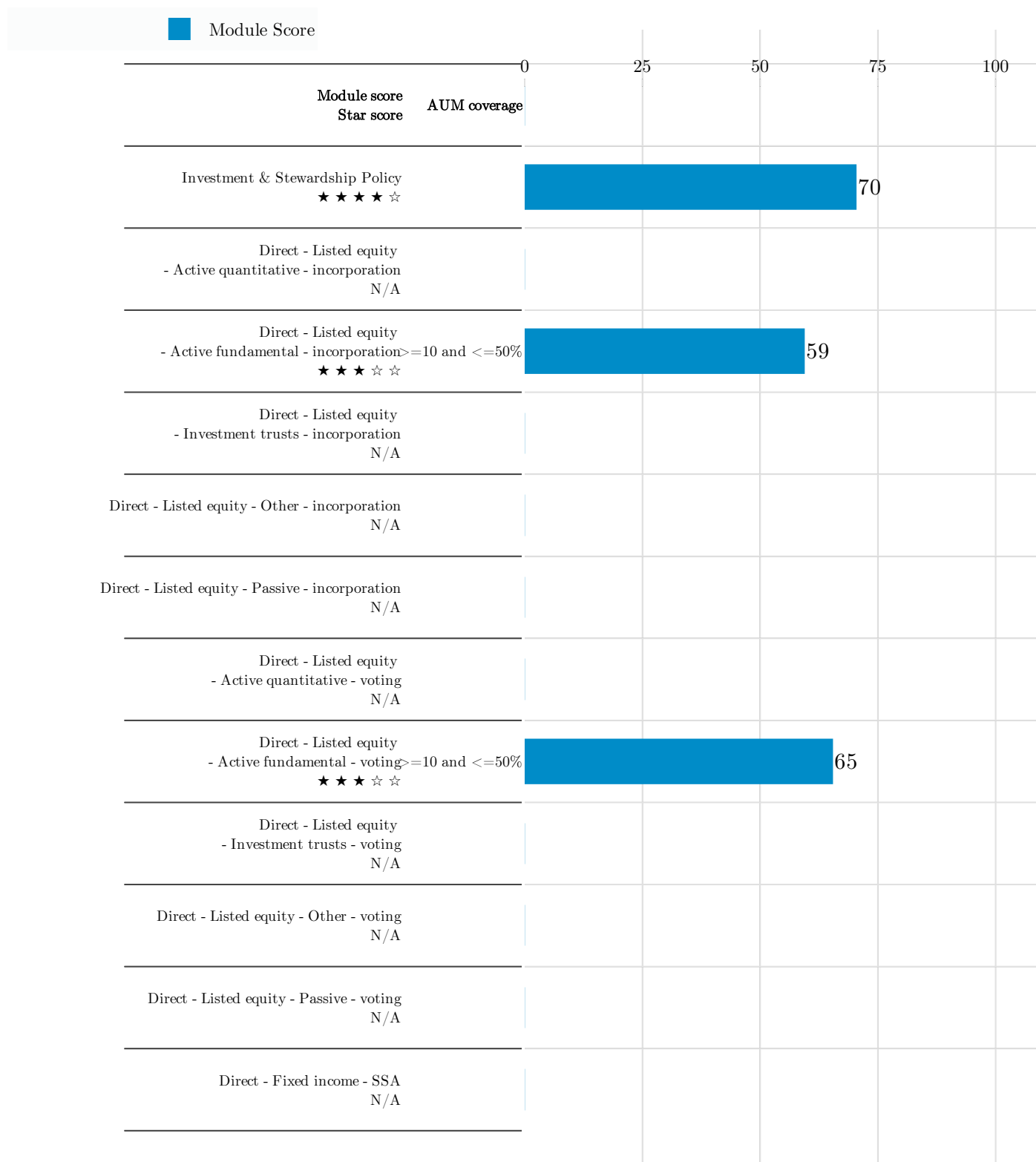
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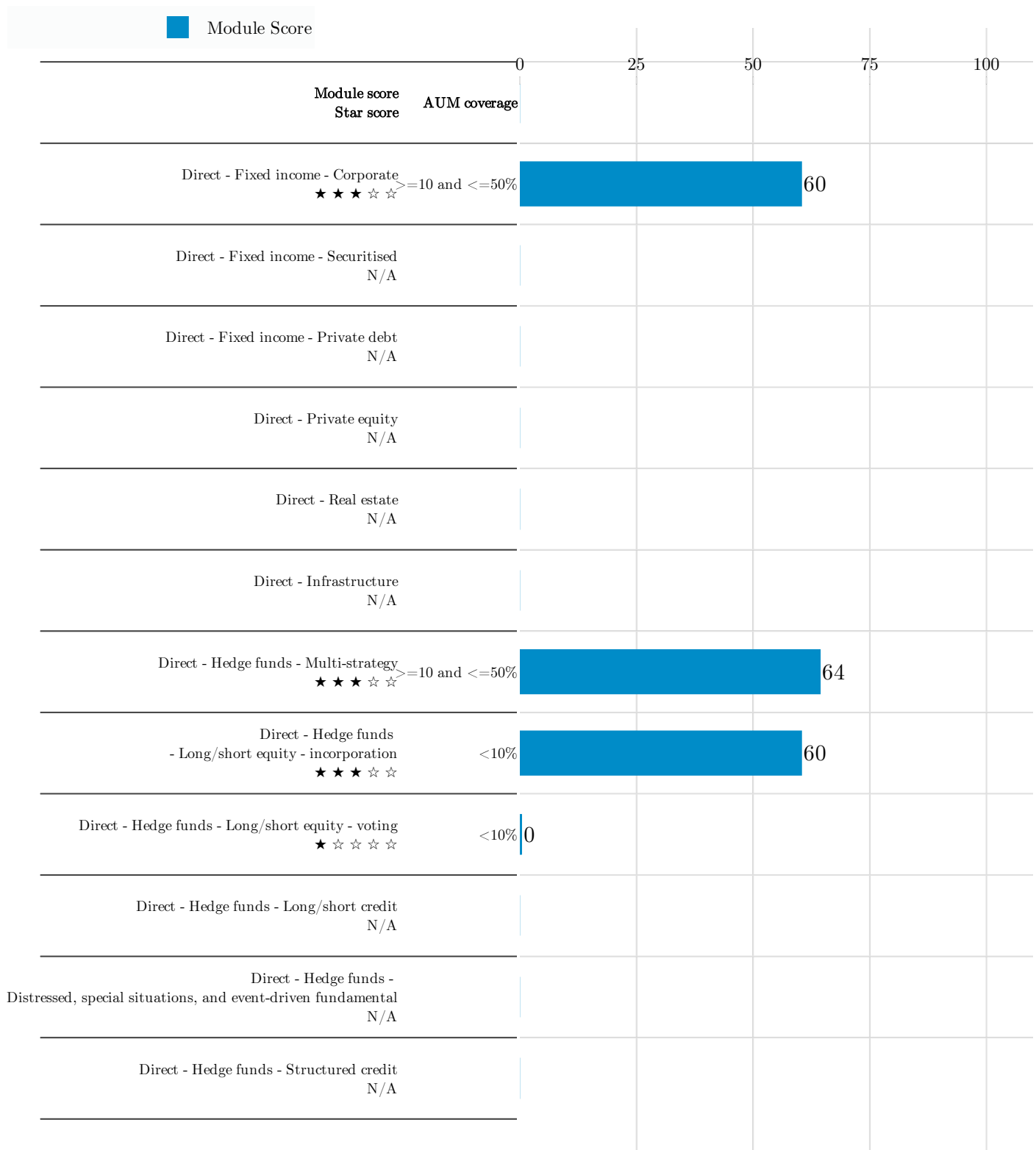
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Summary Scorecard



Summary Scorecard (continued)



Summary Scorecard (continued)

■ Module Score

	0
Module score Star score	AUM coverage
Direct - Hedge funds - Global macro N/A	
Direct - Hedge funds - Commodity trading advisor N/A	
Direct - Hedge funds - Other N/A	
Indirect - Listed equity - Passive N/A	
Indirect - Listed equity - Active N/A	
Indirect - Fixed income - Passive N/A	
Indirect - Fixed income - Active N/A	
Indirect - Private equity N/A	
Indirect - Real estate N/A	
Indirect - Infrastructure N/A	
Indirect - Hedge funds N/A	

Indicator Level Scores For Direct - Fixed income - Corporate

Section	Sub-section	Topic	Indicator	Your Score
Pre-investment phase	Materiality analysis	AUM coverage of ESG materiality assessment process	FI 1	64/200
Pre-investment phase	Materiality analysis	How ESG is incorporated into materiality assessment process	FI 1.1	150/200
Pre-investment phase	ESG risk management	AUM coverage of ESG incorporation in risk management	FI 2.1	86/150
Pre-investment phase	ESG incorporation in asset valuation	AUM coverage of ESG incorporation in investment research	FI 3.1	138/200
Pre-investment phase	ESG incorporation in portfolio construction	Portion of cases where ESG affected portfolio construction	FI 5.1	97/200
Pre-investment phase	ESG incorporation in assessment of issuers	Incorporation of ESG in credit quality analysis	FI 7	200/200
Pre-investment phase	ESG performance	Incorporation of relative ESG performance in investment analysis	FI 8	48/150
Pre-investment phase	ESG risk management	Corporate bonds: coverage of framework for ESG risks at country and sector level	FI 9.1	0/150
Post-investment phase	ESG risk management	Incorporation of ESG in regular reviews	FI 12	112/150
Post-investment phase	ESG risk management	Identification of ESG incidents	FI 13	150/200
Post-investment phase	Time horizons	Time frame for which ESG risks taken into account	FI 14	0/150
Post-investment phase	Long-term ESG trend analysis	Continuous monitoring of long-term ESG trends	FI 15	48/150
Post-investment phase	Thematic bonds	Selection of non-labelled thematic bonds	FI 19	100/100
Post-investment phase	Thematic bonds	Escalation strategies used in the majority of cases when thematic bond proceeds are not allocated as promised	FI 20	60/150
Reporting/Disclosure	ESG screens	Communication of the side-effects of fixed income screening to clients or beneficiaries	FI 21	60/200
Engagement	Engaging with issuers/borrowers	Timing of fixed income engagement	FI 22	200/200

Indicator Level Scores For Direct - Hedge funds - Multi-strategy

Section	Sub-section	Topic	Indicator	Your Score
Policy	Investment guidelines	Hedge fund specific elements of responsible investment policy	HF 1	50/100
Pre-investment phase	Materiality analysis	AUM coverage of ESG materiality assessment process	HF 2	200/200
Pre-investment phase	Materiality analysis	How ESG is incorporated into materiality assessment process	HF 2.1	105/150
Pre-investment phase	Long-term ESG trend analysis	How long-term ESG trends are incorporated into investment analysis	HF 3	112/150
Pre-investment phase	Long-term ESG trend analysis	AUM coverage of long-term ESG trend incorporation	HF 3.1	64/100
Pre-investment phase	ESG incorporation	AUM coverage of ESG incorporation in investment research	HF 4.1	150/150
Pre-investment phase	ESG incorporation in portfolio construction	Portion of cases where ESG affected portfolio construction	HF 6.1	56/150
Pre-investment phase	ESG incorporation in portfolio construction	How emerging and potential ESG risks are assessed	HF 8	112/150
Post-investment phase	ESG risk management	Compliance processes for negative screening	HF 10	64/200
Post-investment phase	ESG risk management	Incorporation of ESG in regular reviews	HF 11	112/150
Post-investment phase	ESG risk management	Identification of ESG incidents	HF 12	75/150
Reporting/Disclosure	Disclosure on ESG products	Information reported to clients or beneficiaries	HF 13	49/150

Indicator Level Scores For Direct - Hedge funds - Long/short equity - incorporation

Section	Sub-section	Topic	Indicator	Your Score
Policy	Investment guidelines	Hedge fund specific elements of responsible investment policy	HF 1	50/100
Pre-investment phase	Materiality analysis	AUM coverage of ESG materiality assessment process	HF 2	200/200
Pre-investment phase	Materiality analysis	How ESG is incorporated into materiality assessment process	HF 2.1	105/150
Pre-investment phase	Long-term ESG trend analysis	How long-term ESG trends are incorporated into investment analysis	HF 3	112/150
Pre-investment phase	Long-term ESG trend analysis	AUM coverage of long-term ESG trend incorporation	HF 3.1	64/100
Pre-investment phase	ESG incorporation	AUM coverage of ESG incorporation in investment research	HF 4.1	150/150
Pre-investment phase	ESG incorporation in portfolio construction	Portion of cases where ESG affected portfolio construction	HF 6.1	68/150
Pre-investment phase	ESG incorporation in portfolio construction	How emerging and potential ESG risks are assessed	HF 8	38/150
Post-investment phase	ESG risk management	Compliance processes for negative screening	HF 10	64/200
Post-investment phase	ESG risk management	Incorporation of ESG in regular reviews	HF 11	112/150
Post-investment phase	ESG risk management	Identification of ESG incidents	HF 12	75/150
Reporting/Disclosure	Disclosure on ESG products	Information reported to clients or beneficiaries	HF 13	49/150

Indicator Level Scores For Direct - Hedge funds - Long/short equity - voting

Section	Sub-section	Topic	Indicator	Your Score
Stewardship	Security lending policy	Securities lending	HF 16	0/200
Stewardship	Security lending policy	Voting and securities lending	HF 16.1	0/150
Stewardship	Alignment & effectiveness	Consistency between voting policy and advice from external voting advisors	HF 17	0/100
Stewardship	Pre-declaration of votes	Pre-declaration of votes	HF 19	0/150
Stewardship	Voting disclosure post AGM/EGM	Disclosure of voting activities	HF 20	0/200
Stewardship	Voting disclosure post AGM/EGM	Time between vote and disclosure of voting activities	HF 20.1	0/150
Stewardship	Voting disclosure post AGM/EGM	Coverage of communication of the rationale for voting abstain/against management recommendations	HF 21.1	0/150
Stewardship	Voting disclosure post AGM/EGM	Coverage of communication of the rationale for voting abstain/against PRI signatory resolutions	HF 22.1	0/100

Indicator Level Scores For Investment & Stewardship Policy

Section	Sub-section	Topic	Indicator	Your Score
Responsible investment policy & governance	Responsible investment policy	Signatories responsible investment policy	ISP 1	200/200
Responsible investment policy & governance	Responsible investment policy	Signatories with elements of responsible investment policy	ISP 1.1	200/200
Responsible investment policy & governance	Responsible investment policy	Signatories with public responsible policy elements	ISP 2	200/200
Responsible investment policy & governance	Responsible investment policy	Coverage of responsible policy elements	ISP 3	200/200
Responsible investment policy & governance	Responsible investment policy	Contents of exclusion policy	ISP 4	100/100
Responsible investment policy & governance	Governance	Roles with formal oversight and accountability for responsible investment	ISP 6	150/150
Responsible investment policy & governance	Governance	Roles with implementation responsibilities for responsible investment	ISP 7	100/100
Responsible investment policy & governance	People and capabilities	Staff objectives for responsible investment practices	ISP 8	150/150
Responsible investment policy & governance	People and capabilities	Bonuses for responsible investment practices	ISP 8.2	100/100
Responsible investment policy & governance	People and capabilities	Frequency at which staff training for responsible investment is reassessed	ISP 9	100/100
Stewardship	Stewardship policy	Coverage of stewardship policy	ISP 11	200/200
Stewardship	Stewardship policy	Elements of stewardship policy	ISP 12	90/150
Stewardship	Stewardship policy implementation	Primary mechanism of stewardship policy	ISP 13	150/150
Stewardship	Stewardship objectives	Primary objective of stewardship policy	ISP 15	200/200
Stewardship	Stewardship prioritisation	Criteria for prioritising engagement targets	ISP 16	100/100
Stewardship	Collaborative stewardship	Positions on collaborative engagement	ISP 18	75/150
Stewardship	Escalation strategies	Escalation strategies not used in stewardship	ISP 20	150/150
Stewardship	Engaging policymakers	Signatories who engage with public policy makers	ISP 23	100/200
Stewardship	Engaging policymakers	Methods used to engage with public policy makers	ISP 23.1	50/200

Indicator Level Scores For Investment & Stewardship Policy (continued)

Section	Sub-section	Topic	Indicator	Your Score
Stewardship	Engaging policymakers	Signatories with governance processes to ensure alignment of political activity with stance on responsible investment	ISP 23.2	200/200
Stewardship	Engaging policymakers – Policies	Signatories with policies to ensure alignment of political activity with stance on responsible investment	ISP 24	0/200
Stewardship	Engaging policymakers – Policies	Public disclosure of political influence policies	ISP 24.1	0/150
Stewardship	Engaging policymakers – Transparency	Disclosure of political influence activities	ISP 25	128/200
Climate change	Public support	Signatories publicly supporting the Paris Agreement	ISP 26	0/150
Climate change	Public support	Signatories publicly supporting the TCFD	ISP 27	0/150
Climate change	Governance	Board oversight for climate-related risks and opportunities [TCFD Governance A]	ISP 28	200/200
Climate change	Governance	Management responsibility for climate-related risks and opportunities [TCFD Governance B]	ISP 29	100/200
Climate change	Strategy	Time horizon for climate risks and opportunities [TCFD Strategy A]	ISP 30.1	200/200
Climate change	Strategy	Climate risks and opportunities identified beyond investment horizon [TCFD Strategy A]	ISP 31	0/200
Climate change	Strategy: Scenario analysis	Use of climate scenario analysis	ISP 33	0/200
Sustainability outcomes	Set policies on sustainability outcomes	Location of policy on sustainability outcomes	ISP 40	200/200
Sustainability outcomes	Set policies on sustainability outcomes	Frameworks referred to in sustainability outcomes policies and processes	ISP 41	200/200
Sustainability outcomes	Identify sustainability outcomes	Tools and frameworks used to identify and map activities onto sustainability outcomes	ISP 44	128/200
Sustainability outcomes	Identify sustainability outcomes	Levels at which sustainability outcomes are identified and mapped	ISP 44.1	150/150
Sustainability outcomes	Identify sustainability outcomes	Processes for identifying most salient sustainability outcomes	ISP 45	0/200
Transparency & Confidence-Building Measures	Information disclosed – ESG assets	Information shared regarding ESG products	ISP 46	75/150
Transparency & Confidence-Building Measures	Client reporting – ESG assets	Information included in regular client reporting for ESG products	ISP 48	75/150
Transparency & Confidence-Building	Information disclosed – All assets	Information shared	ISP 49	150/150

Indicator Level Scores For Investment & Stewardship Policy (continued)

Section	Sub-section	Topic	Indicator	Your Score
Transparency & Confidence-Building Measures	Client reporting – All assets	ESG information included in regular client reporting	ISP 50	200/200
Transparency & Confidence-Building Measures	Frequency of client reporting – All assets	Frequency of client reporting of ESG information	ISP 51	75/100
Transparency & Confidence-Building Measures	Confidence-building measures	Confidence building measures	ISP 52	200/200
Transparency & Confidence-Building Measures	Confidence-building measures	Internal review: coverage	ISP 58	88/100
Transparency & Confidence-Building Measures	Confidence-building measures	ESG labels held	ISP 59	64/200

Indicator Level Scores For Direct - Listed equity - Active fundamental - incorporation

Section	Sub-section	Topic	Indicator	Your Score
Pre-investment phase	Materiality analysis	AUM coverage of ESG materiality assessment process	LE 1	48/150
Pre-investment phase	Materiality analysis	How ESG is incorporated into materiality assessment process	LE 1.1	160/200
Pre-investment phase	Long-term ESG trend analysis	Continuous monitoring of long-term ESG trends	LE 2	96/150
Pre-investment phase	ESG incorporation	Coverage of valuation and financial modelling incorporating ESG risks	LE 3.1	0/150
Pre-investment phase	Assessing ESG performance	AUM coverage of information used in incorporating ESG in financial modelling	LE 4.1	125/150
Pre-investment phase	ESG incorporation in portfolio construction	Portion of cases where ESG affected portfolio construction	LE 6.1	112/150
Pre-investment phase	ESG risk management	Compliance processes for negative screening	LE 8	64/200
Post-investment phase	ESG risk management	Incorporation of ESG in regular reviews	LE 9	112/150
Post-investment phase	ESG risk management	Identification of ESG incidents	LE 10	50/100
Reporting/Disclosure	Sharing ESG information with stakeholders	Communication of the side-effects of listed equity screening to clients or beneficiaries	LE 13	92/100
Reporting/Disclosure	Sharing ESG information with stakeholders	ESG information included in client reporting	LE 14	150/200

Indicator Level Scores For Direct - Listed equity - Active fundamental - voting

Section	Sub-section	Topic	Indicator	Your Score
Stewardship	Voting policy	Voting policies	LE 15	200/200
Stewardship	Voting policy	Coverage of voting policy	LE 15.1	200/200
Stewardship	Voting policy	Guidance on specific ESG issues in voting policy	LE 16	0/150
Stewardship	Shareholder resolutions	Stance on shareholder resolutions	LE 19	150/150
Stewardship	Pre-declaration of votes	Pre-declaration of votes	LE 20	0/150
Stewardship	Voting disclosure post AGM/EGM	Disclosure of voting activities	LE 21	128/200
Stewardship	Voting disclosure post AGM/EGM	Time between vote and disclosure of voting activities	LE 21.1	75/150
Stewardship	Voting disclosure post AGM/EGM	Coverage of communication of the rationale for voting abstain/against management recommendations	LE 22.1	123/150